

## **Privacy Policy**

DataProtech is greatly sensitive to the confidentiality of your information and believes the protection of your privacy to be one of DataProtech's significant responsibilities. This Privacy Policy describes how and when we collect, use, and share your information across our websites, software system, SMS, email notifications, applications, buttons, and that link to this Policy (collectively, the "Services"). For example, you send us information when you use our Services on the web. When using any of our Services you consent to the collection, transfer, storage, disclosure, and use of your information as described in this Privacy Policy. This includes any information you choose to provide that is deemed sensitive under applicable law.

When this policy mentions "we" or "us," it refers to the controller of your information under this policy. Your information is controlled by DataProtech Europe Limited of 27 Old Gloucester Street, London WC1N 3AX. Despite this, you alone control and are responsible for the data you input to DataProtech, and other content you submit through the Services, as provided in the Contract you hold with us.

When this policy mentions 'Hosted' or 'Non-Hosted', it refers to the type of account held with DataProtech. This dictates if you run DataProtech services on your servers, of which you solely are responsible for, or you have your DataProtech services environment hosted by us on our servers, which is a relationship maintained by DataProtech Europe Limited. If you are unsure of what type of account you have, please contact sales.

Irrespective of which country you live in, you authorise us to transfer, store and use your information in the United Kingdom, and any other country where we operate. In some of these countries, the privacy and data protection laws and rules regarding when government authorities may access data may vary from those in the country where you live.

If you have any questions or comments about this Privacy Policy, please submit a request through our form, available at DPO@DataProtech.co.

#### Information Collection and Use

Basic Account Information: If you choose to create a DataProtech account, you must provide us with some personal information, such as your name, email address, or phone number. This also extends to be dependent on whether or not you are a hosted, or non-hosted customer with DataProtech. If you are a hosted customer, DataProtech has a basic purpose as a database, allowing you to store any sort of information that you wish within it. This means that we will be acting as the 'Data Processor' on behalf of the 'Data Controller' that is you, the hosted customer. Which will mean we have access to the information you store with us. This information is secure and is only accessed in a customer service role during an authorised and consented session with you or for service maintenance.



Contact Information: You may provide us with your contact information, such as your email address or phone number, to allow us to keep you updated on latest features or send you helpful 'tips' emails. If you provide us with your phone number, you agree to receive text messages to that number from us. We may use your contact information to send you information about our Services, to market to you, to help prevent spam, fraud, or abuse, and to help others find your account, including through third-party services and client applications. You may also unsubscribe from a notification by following the instructions contained in the notification or the instructions on our website.

Cookies: Like many websites, we use cookies and similar technologies to collect additional website usage data and to improve our Services. A cookie is a small data file that is transferred to your computer or mobile device. We may use both session cookies and persistent cookies to better understand how you interact with our Services, to monitor aggregate usage by our users and web traffic routing on our Services, and to customise and improve our Services. Although most web browsers automatically accept cookies, some browsers' settings can be modified to decline cookies or alert you when a website is attempting to place a cookie on your computer.

## **Information Sharing and Disclosure**

We do not disclose your private personal information except in the limited circumstances described here. If we are engaged in the provision of intelligence gathering or surveillance services on behalf of LEAs (Law Enforcement Agencies) all such data is shared with the relevant LEA.

User Consent or Direction: We may share or disclose your information at your direction, such as when you authorise a third-party web client or application to access your account or when you direct us to share your feedback with a business.

Service Providers: We engage service providers to perform functions and provide services to us in other countries. For example, we use a variety of third-party services to help provide our Services, such as hosting our various blogs and wikis and to help us understand and improve the use of our Services, such as Google Analytics. We may share your private personal information with such service providers subject to obligations consistent with this Privacy Policy and any other appropriate confidentiality and security measures, and on the condition that the third parties use your private personal data only on our behalf and pursuant to our instructions. We share your payment information, including your credit or debit card number, card expiration date, CVV code, and billing address with payment services providers to process payments; prevent, detect and investigate fraud or other prohibited activities; facilitate dispute resolution such as chargebacks or refunds; and for other purposes associated with the acceptance of credit or debit cards.



Law and Harm: Notwithstanding anything to the contrary in this Privacy Policy, we may preserve or disclose your information if we believe that it is reasonably necessary to comply with a law, regulation, legal process, or governmental request; to protect the safety of any person; to address fraud, security or technical issues; or to protect our or our users' rights or property. However, nothing in this Privacy Policy is intended to limit any legal defences or objections that you may have to a third party's, including a government's, request to disclose your information.

# **Accessing and Modifying Your Personal Information**

If you are a direct customer of DataProtech and would like to access and/or modify your personal information, please contact: DPO@DataProtech.co

## **Changes to this Policy**

We may revise this Privacy Policy from time to time. The most current version of the policy will govern our use of your information and will always be at https://www.DataProtech.co/privacy-policy.

If we make a change to this policy that, in our sole discretion, is material, we will notify you via email to the email address associated with your account. By continuing to access or use the Services after those changes become effective, you agree to be bound by the revised Privacy Policy.

Thoughts or questions about this Privacy Policy? Please, let us know by contacting us via DPO@DataProtech.co or writing to us at:

DataProtech Europe Limited 27 Old Gloucester Street London WC1N 3AX

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. We want to empower you to make the best decisions about the information that you share with us. That's the basic purpose of this Privacy Policy.



## The information you share with us

We require certain information to provide our product and services to you. For example, you must have an account with us to be able to use our support portal and to use our services. When you choose to share the information below with us, DataProtech does not acquire any more information about you other than is required by law or is otherwise necessary to provide a high level of service efficiently and securely.

### 1.1 Basic Account Information

If you do choose to create an account, you must provide us with some personal data so that we can provide our services to you. For example, your first and last name, your email address and/or phone number.

#### 1.2 Contact Information

We use your contact information, such as your email address or phone number, to authenticate your account and keep it – and our services – secure, and to help prevent spam, fraud, and abuse. We also use contact information to personalise our services, enable certain account features. for example, for login verification or SMS), and to send you information about our services. If you provide us with your phone number, you agree to receive text messages from Twitter to that number as your country's laws allow. Twitter also uses your contact information to market to you as your country's laws allow.

If you email us, we will keep the content of your message, your email address, and your contact information to respond to your request. Personal Information The Site may require visitors (general visitors to the Site) and customers (visitors with passwords that allow them to go to the password-restricted areas of the Site) to provide contact information (for example, name and e-mail address), unique identifiers (for example, employee ID number for customers), demographic information (for example, postcode or zip code and age) and financial information (for example account or credit card numbers for purchases). DataProtech uses your contact information to create access to products and services on the Site and to send you information about DataProtech. Your contact information is also used to contact you when necessary. Financial information that is collected is used to check your qualifications and bill either you or your company for products and services, as applicable. Demographic and profile data is also collected at our site. DataProtech uses this data to tailor your experience to the Site, showing you content DataProtech believes might interest you, and displaying the content according to your preferences.

### 1.3 Payment Information

You may be requested to provide us with payment information, including your credit or debit card number, card expiration date, CVV code, and billing address, in order to purchase or renew your end user contract with us, provided as part of our services.



## 1.4 How you control the information you share with us

If you are a direct customer of DataProtech and would like to access and/or modify your personal information, please contact: DPO@DataProtech.co

Additional Information we Receive about you & Information we share and/or disclose.

#### 2.2 Cookies

When you use our Websites or Service(s), we may store some information on your computer. This information will be in the form of a "cookie" or similar file. Cookies are small pieces of information stored on your hard drive, not on the DataProtech website. We do not use cookies to spy on you or otherwise invade your privacy. They cannot invade your hard drive and steal information. We use cookies to help you navigate the Websites and Service(s) as easily as possible and to remember information about your current session. These are the Session Cookies and they are removed from your system when you close the web browser or turn off the computer. You must enable cookies on your web browser to use the Service(s). We use cookies to store content information and preferences.

Some cookies are essential for the basic functionalities offered by the Service(s). These class of cookies helps in keeping a user logged in to the Service(s) and remember relevant information when they return to the Service(s). These cookies are essential for the basic functionalities offered by the Service(s). These class of cookies helps in keeping a user logged in to the Service(s) and remember relevant information when they return to the Service(s). Some cookie is used for tracking the user activities within the Service(s), which in turn helps us in improving your user experience. Some cookies are used for providing you with customised and interest-based ads based on your browsing behaviour and other similar activities on our Websites.

### 2.3 Analytics

DataProtech uses third-party software for analytics. All metrics information collected from your usage of the Service(s) shall be transmitted to analytics provider. This information is then used to evaluate how users use the DataProtech website, and to compile statistical reports on activity for us. We further use the same statistical analytics tool to track or to collect your Personally Identifiable Information (PII). We will use this information in order to maintain, enhance, or add to the functionality of the Service(s) and to personalise the experience for you. Anonymised and aggregated information and analysis may be made public where desired by DataProtech. Third party analytics software will not share your PII or associate your PII with any other data held by them. We use ChatBot (Third Party), Google Analytics (Third Party) and Lead analytics (Internal).



# 2.4 DataProtech Employees and Privacy

DataProtech trains all DataProtech employees and contractors about the importance of privacy. DataProtech gives access to your information only to those employees/contractors who require it to perform their jobs.

## 2.5 Access by Our Employees

DataProtech customer service representatives have access to some transaction information in order to respond to your questions. DataProtech limits that access to the minimum information required in order to provide prompt, high-quality service. For example, these DataProtech employee/contractors do not generally have access to complete credit card numbers. In general, DataProtech employees/contractors who do have access to DataProtech databases have undergone background checks, and generally only retrieve data for supporting DataProtech customers' data or individual transactions, and not about individual customers.

## 2.6 Privacy and DataProtech Business Partners

When DataProtech makes our technology or services available to business partners, DataProtech will not share with them any more information than is necessary to perform the transaction you have requested. In addition, DataProtech only does business with partners who agree to respect this Privacy Policy and will make every reasonable effort to assure, by contract or otherwise, that these third parties use our information, technology and services in a manner that is consistent with this Privacy Policy.

### 2.7 Provision of Information to Others

To perform the DataProtech services, DataProtech must, of course, pass information about transactions to payment card processors and banks. From time to time DataProtech may also provide third parties with aggregate information that is not linked to you or any other any particular individual. DataProtech does not provide to any third party your name and e-mail address, or the names and e-mail addresses of other DataProtech customers.

### 2.8 Corporate Data

Protecting the privacy of a customer's personal information is a top priority; however, DataProtech takes the protection of each customer's corporate data and confidentiality to be one of DataProtech's most significant responsibilities. DataProtech uses diligent efforts to ensure each customer's data integrity is limited to the company for which that customer works or has the authorisation to access by using a company-specific password, and that such company's data is not violated or accessed by unauthorised persons.



# 2.9 Information/Data Centre Security

DataProtech stores transaction information on secure computers located in a locked data centre. Only a small number of DataProtech employees/contractors involved in the management of the data centre have physical access to these computers. Where possible, DataProtech encrypts information stored on DataProtech computers as a further measure of protection. DataProtech uses high industry standards in the acquisition and deployment of firewalls and other security technology to prevent DataProtech computers from being accessed by unauthorised persons. DataProtech makes access to confidentially sensitive information subject to rigorous procedural and technological controls, consistent with legal requirements and the demands of customer service.

#### Information we share and disclose

It is DataProtech's policy to never provide your information to third parties without your express permission, or if such disclosure is necessary to process transactions, or provide services which you have requested. The only exception to this policy is if DataProtech is compelled to do so by an appropriately empowered governmental authority.

### 3.1 Law, Harm, and the Public Interest

Notwithstanding anything to the contrary in this Privacy Policy or controls we may otherwise offer to you, we may preserve, use, or disclose your personal data if we believe that it is reasonably necessary to comply with a law, regulation, legal process, or governmental request; to protect the safety of any person; to protect the safety or integrity of our product and services, including to help prevent spam, abuse, or malicious actors on our services, or to explain why we have removed content or accounts from our services; to address fraud, security, or technical issues; or to protect our rights or property or the rights or property of those who use our services. However, nothing in this Privacy Policy is intended to limit any legal defences or objections that you may have to a third party's, including a government's, request to disclose your personal data.

### 3.2 Service Providers

We engage service providers to perform functions and provide services to us in the United Kingdom and other countries. For example, we use a variety of third-party services to help operate our services, such as hosting our various blogs and user guides and to help us understand the use of our services, such as Google Analytics. We may share your private personal data with such service providers subject to obligations consistent with this Privacy Policy and any other appropriate confidentiality and security measures, and on the condition that the third parties use your private personal data only on our behalf and pursuant to our instructions. We share your payment information with payment services providers to process payments; prevent, detect, and investigate fraud or other prohibited activities; facilitate dispute resolution such as chargebacks or refunds; and for other purposes associated with the acceptance of credit and debit cards.



# **Managing your Personal Information with us**

You control the personal data you share with us. If you are a non-hosted customer, you have total control of how and what you input into your dedicated support portal.

### **Accessing or Rectifying Your Personal Data**

### 4.1 Deletion

We keep Log data up to 4 weeks after contract termination. If you wish to cancel your account, please email sales@DataProtech.co, and the cancelation process will commence. For up to 30 days after deactivation, it is still possible to restore your DataProtech account information if you decide to continue with your Contract with DataProtech.

## 4.2 Object, Restrict, or Withdraw Consent

If you are a direct customer of DataProtech and would like to Object, Restrict, or withdraw consent regarding your personal information, please contact DPO@DataProtech.co regarding your query.

### 4.3 Portability

If you are a direct, hosted customer of DataProtech, we are able to provide you with a full copy of your database. To do this, please contact: DPO@DataProtech.co

#### 4.4 Additional Information or Assistance

Thoughts or questions about this Privacy Policy? Please, let us know by contacting us via DPO@DataProtech.co or writing to us at:

DataProtech Europe Limited 27 Old Gloucester Street London WC1N 3AX

#### 4.5 Data Protection Officer

DataProtech Europe Limited is registered with the UK ICO under number ZA771669 and our Data Protection Officer can be contacted by email <a href="mailto:DPO@DataProtech.co">DPO@DataProtech.co</a>



### **Children and Our Services**

5.1

Our services are not directed to children, and you may not use our services if you are under the age of 13. You must also be old enough to consent to the processing of your personal data in your country (in some countries we may allow your parent or guardian to do so on your behalf). You must be at least 16 years of age to use DataProtech.

# **Changes to this Privacy Policy**

6.1

We may revise this Privacy Policy from time to time. The most current version of the policy will govern our use of your information and will always be at https://DataProtech.co/privacy-policy

## Questions

If you have questions about this Privacy Policy, please send an e-mail to DPO@DataProtech.co and we will respond in accordance with our standard service level agreement.

Effective: 1st August 2020