

Privacy Policy United Kingdom

Welcome to the privacy policy of the GetBusy group which includes GetBusy plc and its subsidiaries GetBusy UK Limited, GetBusy Australia Pty Limited and GetBusy USA Corporation (referred to in this privacy policy as “we”, “us” or “our”). You can contact us to find out further information about our group structure.

We respect your privacy and are committed to protecting your personal information. This privacy policy describes how we collect, use and disclose your personal information, and what rights you have with respect to the use of your information.

This privacy policy is provided in a layered format so that you can click through to the specific areas set out below.

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Purpose of this privacy policy

This privacy policy sets out the information we hold about you, how we collect and use the information and other key information about your rights in respect of our use of your information.

We may hold your personal information either for our own purposes or on behalf of our customers. Under European data protection laws, we

are acting as a “data controller” where we use your information for our purposes and determine how and why we use your information. We are acting as a “data processor” where we hold personal information on behalf of a Customer Organisation (or, in certain circumstances, an Individual Customer). Whether we are acting as a data controller or a data processor will depend on the circumstances.

In line with our obligations under European data protection laws, this privacy policy sets out how we will collect, hold and use your personal information where we are a data controller with respect to your personal information. In particular the table in the section “How we use your personal information” below specifies the purposes for which we may use your personal information as a data controller. Where we refer to “you” and “your” in this privacy policy, we are talking to the individual whose personal information we use as a data controller.

We have used the following terms in this privacy policy:

- **“Customer Organisation”**: a customer organisation (such as company or professional firm) that has signed up for a Service offered by the GetBusy group.
- **“Individual Customer”**: an individual customer (for example, a sole trader) who has signed up for a Service offered by the GetBusy group (this does not include an individual employed or otherwise engaged by a Customer Organisation, who is authorised by the Customer Organisation to use the Service).
- **“Services”**: the services supplied by the GetBusy group in connection with one or more of its proprietary software products which include Virtual Cabinet, Virtual Cabinet Portal, SmartVault and the GetBusy platform. platform.

This privacy policy addresses our use of personal information about you as an individual (in relation to your use of our Services) rather than our use of information about our Customer Organisations, which is dealt with separately through our [Terms of Service](#).

Personal information we hold on behalf of our customers

Some of the information stored by customers through our Services incorporates personal information about individuals. This includes information we hold on behalf of our Customer Organisations and information we hold on behalf of our Individual Customers, where we hold information on their behalf about other people.

Where we hold this information solely on behalf of our customers and do not use it for our own purposes, under European data protection laws we will be acting as a “data processor” and will hold that information in accordance with the terms of our contracts with our customers. In these circumstances, our customers will be acting as data controllers in respect of the information.

Though we will of course keep this information secure as a key feature of any Services that we provide, this privacy policy does not address our use of personal information where we are acting as a data processor because in those circumstances it is our customers’ responsibility to provide this information to the people whose information we hold.

The kinds of personal information we hold about you

Personal data, or personal information means any information about an individual from which that individual can be identified.

We may collect, use and hold the following different kinds of personal information about you (depending on whether you are an Individual Customer or an individual user of our Services employed by one of our Customer Organisations):

- **Identity Data** including first name, last name, username or similar identifier, title, data of birth and gender.
- **Profile Data** including your username and password, user preferences, comments, feedback and other information that you submit to our Services.

- **Contact Data** including postal address, email address and telephone numbers.
- **Customer Content Data** being personal information contained in documents, messages, comments, text and images that you upload to or transmit through our Services that we provide.
- **Support Data** being comments, feedback and information that you submit to us when using our support services.
- **Financial and Transaction Data** including bank account, payment card details, billing address and other payment details.
- **Technical Data** including unique user identifier, internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug in types and versions, operating system and platform and other technology on the devices you use to access our Services.
- **Usage Data** being information about how you use our Services (for example, through the services metadata, we log the areas, activity types, people, features, content and links you interact with, the type of files you share and what third party services you use, if any).
- **Marketing Data** including your marketing preferences in relation to receiving marketing communications from us and, where relevant, third parties.

In limited circumstances, where you are an Individual Customer, we may be a data controller in respect of special categories of data about you. This will only be the case if you upload or otherwise transmit these types of data about yourself when using our Services (for example, if you upload documents or send messages that contain special categories of data about yourself). Special categories of data attract a higher level of protection under data protection laws and include data concerning health and sexual orientation and data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership.

How we collect your personal information

We use the following different methods to collect data from and about you including through:

- **Direct interactions with you.** For example, you may submit your personal information (including Identity Data and Contact Data) to us as part of submitting an enquiry form on our website or setting up an account for one of our Services or we may send marketing materials and promotions to you (in accordance with your marketing preferences).
- **Automated technologies or interactions.** As you interact with our Services, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this data by using cookies, server logs and other similar technologies. You can control cookies through your browser's settings and other tools. However, if you block certain cookies, you may not be able to register, login, or access certain parts or make full use of the Services that you sign up for or are otherwise authorised to access. Please see our cookie policy for further details.
- **Third parties.** We may receive your name and contact details from an existing customer who invites you to use a Service or through a referral arrangement with our business partners. We may also source marketing lists from third parties which contain personal information (i.e. Identity Data and Contact Data) about those that might be interested in our services.

How we use your personal information

Where we are a data controller in respect of your personal information, we are required by European data protection laws to be clear about the purposes for which we are processing that personal information and our lawful basis for doing so.

We set out below, in a table format, a description of the ways we plan to use your personal information in our capacity as a data controller.

Note that we may process your personal information using more than one lawful ground depending on the specific purpose for which we are using your information. Please contact us if you would like details about the specific legal ground we are relying on to process your personal information where more than one ground has been set out in the table below.

Purpose/Activity	Lawful basis for processing
For account management and other administrative purposes including keeping track of billing and payments.	<p>Necessary for our legitimate interests (where you are (i) an Individual Customer or (ii) a billing or other account management contact at the Customer Organisation)</p> <p>Performance of our contract with you (where you are an Individual Customer)</p>
For marketing and communication purposes such as making suggestions and recommendations to you about goods or services that may be of interest to you.	<p>Necessary for our legitimate interests to develop our products/services and grow our business</p>
To improve our website, products/services, marketing, customer relationships and experiences (using data analytics etc.)	<p>Necessary for our legitimate interests to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy</p>
To administer and protect our business and keep the Service working, safe and secure (by troubleshooting, data analysis, testing, system maintenance and monitoring and addressing other security/technical issues).	<p>Necessary for our legitimate interests for running and protecting our business, ensuring appropriate security, investigating and helping to prevent security issues and abuse, to prevent fraud and so on</p> <p>Necessary to comply with a legal obligation</p>
Where you are an Individual Customer, for providing the Service to you, notifying you about changes or updates to the Service and responding to your support queries.	<p>Performance of our contract with you</p> <p>Necessary for our legitimate interests to develop our products/services and grow our business</p>

Where you are an Individual Customer, the provision of your personal information is necessary for us to enter into a contract with you and to perform that contract. Where you are an Individual Customer, we will also ask for your explicit consent to process any special categories of data about yourself that you upload to or otherwise transmit through

our Services. You are not required to give your consent but, if you choose not to, you must not submit to our Services any information about yourself that incorporates special categories of data.

We are a provider of products and services and you are not obliged to provide your personal details to us. However, if you choose not to provide your personal information to us, we may not be able to respond to your queries or provide our products and services to you.

Marketing

We want to provide you with choices regarding certain personal information uses, particularly around marketing and advertising. You can ask us at any time to stop sending you messages by unsubscribing from emails or otherwise contacting us to specify your marketing preferences.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us where you have requested products or services from us as an Individual Customer or if you have requested information from us and, in each case, you have not opted out of receiving that marketing.

How we share and disclose your personal information

We may share your personal data with the parties set out below to enable us to carry out the activities specified in the table above (see “How we collect and use your personal information” section):

- Entities within the GetBusy group.
- Our service providers, which include:
 - hosting providers to store and process your data
 - customer relationship management providers for customer communication, support, ideas portals and so on

- data analytics providers to capture and analyse your usage data and so on
- finance providers to provide financing services for certain products
- marketing platform providers
- plugin providers to enhance our products with additional functionality
- hardware and services providers to provide you with hardware and services to support you use of our products; and
- Our business partners, which include integrators.

In addition, if we choose to sell, transfer, or merge parts of our business or our assets or if we seek to acquire other businesses or merge with them, we may need to share your personal information with those other businesses. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

International transfers

We will transfer your personal information outside of the European Economic Area (“EEA”) when we share the information with:

- the entities within our GetBusy group;
- our service providers (as specified in the section above) based in the US; and
- our business partners including integrators.

Whenever we transfer your personal data outside of the EEA, we ensure that safeguards are in place which meet the standards required by European data protection laws.

Where we transfer your personal data to corporate entities within the GetBusy group that are based outside of the EEA, we use specific contracts approved by the European Commission which ensure that your personal information is given the same protection it has in Europe. For further details and a copy of the relevant contracts, see the European Commission's webpage on the model contracts for the transfer of personal data to third countries.

Where we transfer your personal data to our US based service providers or business partners, we ensure that they are certified under the EU-US privacy shield framework as having adequate safeguards in place. For further details on the privacy shield framework, you can go to the privacy shield website at <https://www.privacyshield.gov/Program-Overview>.

Please contact privacy@getbusy.com if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third party service providers who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax and legal purposes.

In some circumstances you can ask us to delete your data: see the “erasure” right in the section below for further information.

In some circumstances we may anonymise your personal information (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your data protection rights

Under certain circumstances, you have rights under data protection laws in relation to your personal information. This may include the following rights:

- **Request access to your personal information** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal information that we hold about you.** This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure of your personal information.** This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

- **Object to processing of your personal information.** This right applies where we are relying on our legitimate interests (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing of your personal information.** This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer of your personal information to another party** (known as the “right to data portability”).
- **Withdraw consent.** This right applies only if we are relying on your consent to process any of your personal information. This will not affect the lawfulness of any processing carried out before you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact privacy@getbusy.com.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is

particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Data Protection Authority

You have the right to make a complaint at any time to the UK supervisory authority for data protection issues. This is the Information Commissioner's Office (ICO) whose details can be accessed via the ICO website at <https://ico.org.uk/global/contact-us>

We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please do get in touch using the details in our "[Contacting us](#)" section below.

Changes to this privacy policy

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact privacy@getbusy.com.

Contacting us

You are welcome to contact us. Our contact details are as follows:

GetBusy Privacy Team | privacy@getbusy.com

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