

## Privacy statement

Version: January 2022

Caseboard Limited ("Caseboard", "we", "us" or "our") respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

### 1. Important information

#### Purpose of this privacy policy

This privacy policy applies to our website, any related newsletters or email alerts, and digital subscriptions provided by Caseboard or any of our other products or services.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

#### Changes to the privacy policy

We keep our privacy policy under regular review and we reserve the right to change this privacy policy at any time, effective upon posting on our website.

#### Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

### 2. The data we may collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes names or similar identifiers.
- **Contact Data** includes address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.

- **Technical Data** includes electronic network activity information.
- **Profile Data** includes your username and password, purchases or orders made by you.
- **Usage Data** includes information about how you use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We may also collect and use **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

### 3. How is your personal data collected?

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

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - create an account on our website;
  - subscribe to or purchase our services;
  - request marketing to be sent to you; or
  - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data and Usage Data. We do this using Cloudflare's analytics service, which asserts that it does not use cookies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out:
  - Technical Data from third parties including analytics providers and search information providers based in and outside the UK
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
  - Identity Data from publicly available sources.

We only use cookies which are strictly necessary for delivering our service over the internet.

#### 4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

#### Purposes for which we will use your personal data

We have set out below a description of the ways we may use your personal data, and which of the legal bases we rely on to do so.

Purpose/Activity	Lawful basis for processing including basis of legitimate interest
To register you as a new user	Performance of a contract with you
To provide and deliver our services and products, to provide support for them and to develop them	(a) Performance of a contract with you; and/or (b) Necessary for our legitimate interests (e.g. for delivery and development of our services and products, and running our business)
To manage our relationship with you	(a) Performance of a contract with you; and/or (b) Necessary to comply with a legal obligation; and/or (c) Necessary for our legitimate interests (e.g. to keep our records updated)
To administer and protect our business and our website (including security, troubleshooting, testing, system maintenance, support, reporting and hosting of data)	(a) Necessary for our legitimate interests (e.g. for running our business, provision of administration and IT services, network security); and/or (b) Necessary to comply with a legal obligation
To deliver relevant content to you and measure or understand the effectiveness of the content we serve to you	Necessary for our legitimate interests (e.g. to study usage of our products/services for development purposes)

To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Necessary for our legitimate interests (e.g. for delivery and development of our services and products, and running our business)
--	---

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. If you have registered an account with us, you can manage your marketing preferences, including asking us to stop sending you marketing communications, through your account. If you have requested marketing communications from us but you do not have an account, you may ask us to stop sending you marketing communications by emailing [privacy@caseboard.io](mailto:privacy@caseboard.io).

We may use your 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 (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased or subscribed to products from us and you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

## 5. Disclosures of your personal data

We may share your personal data with the following parties for the purposes set out above:

- External Third Parties as set out in the *Glossary*.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. 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 policy.

We require all third parties to respect the security of your personal data 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 data for specified purposes and in accordance with our instructions.

## 6. International transfers

Some of our external third parties are based outside the UK so their processing of your personal data may involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.

- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

## 7. Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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 various purposes, including tax purposes.

In some circumstances we will anonymise your personal data (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.

## 8. Your legal rights

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent or where processing is lawfully carried out on another basis. If you withdraw your consent, we may not be able to provide certain products or services to you.

Further details can be found on the ICO website: <https://www.ico.org.uk>. If you wish to exercise any of your rights set out above, please contact [privacy@caseboard.io](mailto:privacy@caseboard.io).

You will not have to pay a fee to access your personal data (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 could 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 data (or to exercise any of your other rights). This is a security measure to ensure that

personal data 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 could 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.

## 9. Glossary

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

**External Third Parties** means:

- Service providers based the UK, Europe and the USA who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- Regulators and other authorities who require reporting of processing activities in certain circumstances.

## 10. Questions and complaints

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us at [privacy@caseboard.io](mailto:privacy@caseboard.io).

If you have complaints about Caseboard's processing of your personal information, you may have the right to make a complaint to the applicable supervisory authority. The UK's data protection authority, the ICO, can be contacted using the details below. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so welcome you contacting us in the first instance.

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

ICO helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>