

Privacy Statement – Applicable Business Services

This Privacy Statement will inform you about the information we process, about you whilst you utilise business services provided by Applicable, and in some respects, after you cease using those services. In delivering our business services information, we sometimes serve as the data controller and, at times, as the data processor. By law, we are required to provide you with information about us, about why and how we use your data, and about the rights you have over your data.

Who are we?

We are Applicable Ltd (Applicable), a company registered in England and Wales (Company No. 03426111) whose registered office is at C/O RWK Goodman LLP, Midland Bridge House, Midland Bridge Road, Bath, England, BA2 3FP. Our main office is 3120 Great Western Court, Bristol, BS34 8HP. Applicable also operates in North America and Australia.

Information we collect about you

Personal Data is any information that identifies you or relates to you. We collect Personal Data about you from different sources when you use our Services. The type of Personal Data that we collect about you varies based on our interactions with you.

• Personal Data that we collect directly from you

We collect Personal Data directly from you in the following circumstances:

- When we onboard you as a customer or representative of our client (we collect your name, business contact information, job title, the company you work for, financial and payment information (where applicable)).
- When you place an order for our Services or otherwise interact with us, you may be required to create an account (see above for information collected).
- When we communicate with you (via email, chat, voice calls and/or service portal).
- When you interact with us (we may collect your name, contact details such as phone numbers and email address, the company your work for, user credentials, device details, and location).
- When you provide your details through our website (we may collect your name, contact details such as phone numbers and email address, the company your work for, contact preferences, additional information as may be noted video and voice calls).
- When you access some of our premises (we may collect your name, contact details such as phone numbers and email address, the company your work for, and CCTV recordings of you at our premises).
- When we collect technical information in relation to delivery of our Services.

- **Personal Data we collect from other sources**

We also collect Personal Data from other sources, as follows:

- **Our Service Providers:** We may collect information about you from our Service Providers where we have sub-contracted out parts of our Services; where we engage third party applications, services or products; or where we engage third parties to administer Applicable internal business processes. For purposes of this Privacy Statements all such Service Providers and third parties are referred to as 'Service Providers'.
- **Our Channel Partners:** We collect information about you to provide contracted services.
- **The company you work for:** We may access information about you from the company you work for when we provide Services as specified in our agreed contract with you or the company you work for ('contract').

- **Special Categories of Personal Data we collect about you**

We only collect Special Categories of Personal Data about you in certain instances, such as:

Special Categories of Personal Data includes information relating to your health, biometric or genetic information, religion, political beliefs, union membership, race or sexual orientation. We ask that you do not send or provide this information to us.

You can choose not to provide Personal Data to us, in certain circumstances. However, if your Personal Data is necessary to provide you with Services as required by our contract or to perform customer relationship management and/or administrative functions related to our contract, we may be unable to provide this Service without your Personal Data.

Our lawful basis for using information about you

When we Use your Personal Data in connection with the purposes set out in this Privacy Statement, we may rely on one or more of the following legal bases, depending on the purpose for which your Personal Data was collected and our relationship with you:

- **Performance of contract:** To provide Services as specified in our contract.
- **Our legitimate business interests:** To protect our legitimate business interests or those of a third party with whom we share your Personal Data. Whenever we rely on this lawful basis to Use your Personal Data, we assess our business interests to ensure that they do not override your rights. Additionally, you may have the right to object to our Use of your Personal Data in certain circumstances. See 'Your Personal Data Rights' section of this Privacy Statement.
- **Compliance with a mandatory legal obligation:** To ensure that we comply with applicable laws and regulations that govern and regulate how we do business.
- **Consent:** Where you have provided consent to the Use of your Personal Data.

We may use your personal data for

- **Performance of Contract and Pre-Contractual Activities.** To provide Services to you as specified in our contract, including provisioning of Services and enabling the use of certain features. We may process Personal Data in staging environments, to remove service risk change. Staging environments will have the same security controls as production environments. The Supplier will not process customer data in test or development environments.
- **Account Management:** To process orders, including billing and payment for Services.
- **Customer Relationship Management and Administration:** To perform general business administration, management and operations of our contract, including managing our business relationship with you and sending administrative information and notices to you.
- **User Account Management:** To create and manage user accounts required for the Services.
- **Ticket Resolution:** To communicate and co-ordinate with you in a timely manner to assist in resolution of support incidents, requests or change logged with us.
- **Business Process Improvements:** To improve the way we deliver Services to you, including obtaining feedback from you about our products, services and solutions including through client satisfaction surveys.
- **Reporting on Contract Performance:** To report on the Services and resolution activities.
- **Communications:** To send communications to you related to the Services;
- **Marketing:** To send marketing communications to you; provide you with current information about our products, services and solutions; provide you with a more personalised experience when you interact with us; enable you to subscribe to our newsletters and mailing lists; enable you to register for events, workshops and seminars hosted by us.

How we share information about you

We may share your Personal Data with the following parties for the purposes set out in this Privacy Statement (as applicable):

- **Applicable subsidiaries:** We may share information about you with our subsidiaries for the purposes of operating our business, delivering, analysing, improving, securing, and customising our Services and other communications related to our business, and for other legitimate purposes permitted by applicable law or otherwise with your consent.
- **Authorised personnel and advisors:** We may share information about you with authorised personnel, agents, and professional advisors of Applicable, including legal advisors, auditors, and consultants to Applicable, where required.
- **Our Service Providers:** We may share information about you with our Service Providers where we have sub-contracted out parts of our Services; where we engage third-party applications, services or products; or where we engage third parties to administer internal business processes, examples include the provision of Service Desk, cloud hosting, websites and specialist

security services. Full details, including processing locations, will be included in Data Processing Agreements or Contracts.

- **Our Channel partners:** We may share information about you with our Business Partners with whom we jointly offer Services, with respect to providing additional technical assistance in resolving the issue logged.

We also may share Personal Data in the following circumstances:

- When you consent to the sharing of your Personal Data.
- In connection with the agreed terms of contract for the Service provided.
- In connection with any joint venture, merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or to another company and to our advisors and the advisors of the other company in such transactions.
- To protect the rights, property or safety of Applicable, its Channel partners, you, or others, or as otherwise required by applicable law.
- To respond to a request for information by a competent authority in accordance with, or required by any applicable law, regulation or legal process; or where necessary to comply with judicial proceedings, court orders or government orders.
- In aggregated, anonymised, and/or de-identified form that cannot reasonably be used to identify you.
- For other legal reasons.

Any Service Providers or other parties with whom we share Personal Data are contractually required to implement appropriate physical, administrative and technical safeguards to protect Personal Data and are not permitted to use Personal Data for any purpose other than the purpose for which they are provided with or given access to Personal Data by us.

How we protect information about you

We are committed to protecting your Personal Data from accidental or unlawful destruction, loss, alteration, unauthorised access or disclosure by using a combination of physical, administrative and technical safeguards, and contractually require our Service Providers to whom we disclose your Personal Data to do the same. Applicable is certified for ISO 27001 and Cyber Essential Plus.

Please note that we cannot guarantee 100% security of your Personal Data, and, we recommend that you take reasonable steps to protect your Personal Data.

How long we keep information about you

We keep information about you for as long as is necessary to fulfil the purpose for which it was collected, unless we are required to keep it for longer to comply with our legal obligations, resolve disputes, protect our assets, or enforce our rights. The criteria we use to determine how long we keep Personal Data includes:

- We are under a legal, contractual or other obligation to keep your Personal Data, or as part of an investigation for litigation purposes.
- Your Personal Data is needed to maintain accurate business and financial records.

- If there are automated means (if any) to enable you to access and delete your Personal Data at any time.
- The information about you is sensitive Personal Data, in which event we will generally retain this for a shorter period of time.
- You have consented to us keeping your Personal Data for a longer time period and we keep your Personal Data in line with your consent.
- As contracted in our Data Processing Agreements

In some instances, we may anonymise your information in accordance with our policies and may keep those anonymised records for longer periods.

Your Personal Data rights

You have rights under various data protection laws in various countries in relation to your Personal Data to access and control your Personal Data, but we offer them irrespective of your location.

We are committed to upholding the following rights:

- **Right to be informed:** You have a right to know what Personal Data we have about you, what we do with it, where we get it from, who we share it with, how long we keep it and why we need it.
- **Right of access:** You have the right to access your Personal Data and obtain a copy of your Personal Data from us.
- **Right to rectification:** You have the right to update inaccurate and/or incomplete Personal Data about you.
- **Right to be forgotten:** You have the right to have your Personal Data erased, deleted or destroyed.
- **Right to data portability:** You have the right to move, copy or transfer your Personal Data in a safe and secure way and reuse it for your own purposes.
- **Right to withdraw consent:** You have the right to withdraw consent at any time regarding the Use of your Personal Data or in relation to direct marketing activities.
- **Right to restrict Use:** You have the right to limit the way we Use your Personal Data.
- **Right to object:** You have the right to stop or prevent us from Using your Personal Data. In particular, you can object to our Use of your Personal Data for direct marketing or the sale of your Personal Data.
- **Right to challenge automated decisions:** You have the right to query and review decisions made about you using purely automated means (i.e. without human involvement or intervention).
- **Right to complain:** You have the right to complain or raise a concern about how we Use your Personal Data. You may make a complaint directly to us or a relevant Data Protection Authority.

Where you contact us, we may request specific information from you to verify your identity to enable us to search for and provide you with access to or a copy of your Personal Data, as permitted under applicable law. Where permitted under applicable law, we may charge you a reasonable fee to access your Personal Data; however, we will advise you of any fee in advance.

Individuals may hold additional rights in certain countries, which must be recognized and upheld.

In some situations, we may not be required to enforce these rights, where permitted under applicable law. We may also have a legitimate business interest to decline a request to action your rights.

You may contact us with requests, complaints or questions regarding these rights as set forth in the 'How to contact us' section, below.

Changing your consent preferences

In some instances, you may provide Applicable with consent to process your Personal Data such as where you have opted into receiving direct marketing communications from us. You can change your consent preference at any time, and manage your communication preferences by:

- Sending an email to dpo@applicable.com
- Write to us at Applicable Ltd, 3120 Great Western Court, Hunts Ground Road, Stoke Gifford, Bristol, BS34 8HP.

DataRep

Following the UK's exit from the European Union, as of the 1st January 2021 we are required to provide a Data Protection Representative within the EEA allowing data subjects to raise matters directly to this representative for the purposes of the EU GDPR. Applicable have appointed DataRep to undertake this role on our behalf and they can be contacted by email at applicable@datarep.com or at the postal address locations in the table below. Please note that when mailing enquiries, it is essential that you mark your letters for attention of 'DataRep' and not Applicable Ltd, but please refer clearly within your correspondence to Applicable Ltd.

Country	Address
Austria	DataRep, City Tower, Brückenkopfgasse 1/6. Stock, Graz, 8020, Austria
Belgium	DataRep, Place de L'Université 16, Louvain-La-Neuve, Waals Brabant, 1348, Belgium
Bulgaria	DataRep, 132 Mimi Balkanska Str., Sofia, 1540, Bulgaria
Croatia	DataRep, Ground & 9th Floor, Hoto Tower, Savska cesta 32, Zagreb, 10000, Croatia
Cyprus	DataRep, Victory House, 205 Archbishop Makarios Avenue, Limassol, 3030, Cyprus
Czech Republic	DataRep, IQ Ostrava Ground floor, 28. října 3346/91, Ostrava-mesto, Moravska, Ostrava, Czech Republic
Denmark	DataRep, Lautruphøj 1-3, Ballerup, 2750, Denmark
Estonia	DataRep, 2 nd Floor, Tornimäe 5, Tallinn, 10145, Estonia
Finland	DataRep, Luna House, 5.krs, Mannerheimintie 12 B, Helsinki, 00100, Finland
France	DataRep, 72 rue de Lessard, Rouen, 76100, France
Germany	DataRep, 3rd and 4th floor, Altmarkt 10 B/D, Dresden, 01067, Germany
Greece	DataRep, 24 Lagoumitzi str, Athens, 17671, Greece
Hungary	DataRep, President Centre, Kálmán Imre utca 1, Budapest, 1054, Hungary
Iceland	DataRep, Kalkofnsvegur 2, 101 Reykjavík, Iceland
Ireland	DataRep, The Cube, Monahan Road, Cork, T12 H1XY, Republic of Ireland
Italy	DataRep, Viale Giorgio Ribotta 11, Paiono 1, Rome, Lazio, 00144, Italy
Latvia	DataRep, 4th & 5th floors, 14 Terbatas Street, Riga, LV-1011, Latvia

Liechtenstein	DataRep, City Tower, Brückenkopfgasse 1/6. Stock, Graz, 8020, Austria
Lithuania	DataRep, 44A Gedimino Avenue, 01110 Vilnius, Lithuania
Luxembourg	DataRep, BPM 335368, Banzelt 4 A, 6921, Roodt-sur-Syre, Luxembourg
Malta	DataRep, Tower Business Centre, 2nd floor, Tower Street, Swatar, BKR4013, Malta
Netherlands	DataRep, Cuserstraat 93, Floor 2 and 3, Amsterdam, 1081 CN, Netherlands
Norway	DataRep, C.J. Hambros Plass 2c, Oslo, 0164, Norway
Poland	DataRep, Budynek Fronton ul Kamienna 21, Krakow, 31-403, Poland
Portugal	DataRep, Torre de Monsanto, Rua Afonso Praça 30, 7th floor, Algès, Lisbon, 1495-061, Portugal
Romania	DataRep, 15 Piața Charles de Gaulle, nr. 1-T, București, Sectorul 1, 011857, Romania
Slovakia	DataRep, Apollo Business Centre II, Block E / 9th floor, 4D Prievozska, Bratislava, 821 09, Slovakia
Slovenia	DataRep, Trg. Republike 3, Floor 3, Ljubljana, 1000, Slovenia
Spain	DataRep, Calle de Manzanares 4, Madrid, 28005, Spain
Sweden	DataRep, S:t Johannesgatan 2, 4th floor, Malmo, SE - 211 46, Sweden
Switzerland	DataRep, Leutschenbachstrasse 95, ZURICH, 8050, Switzerland

Updates to our Privacy Statement

We may update our Privacy Statement at any time. If we do, we will update the 'Version' and 'Last Checked' information in the footer of our Privacy Statement. We encourage you to regularly review our Privacy Statement to stay informed about how we Use your Personal Data and privacy practices.

How to contact us

If you have any questions about how we Use your Personal Data, have a privacy concern, or wish to make a request or complaint relating to your Personal Data, please contact us at dpo@applicable.com