



PRIVACY POLICY

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Last updated: 10th Dec 2018

This privacy policy explains the types of personal data that we may collect about visitors to our website, those who subscribe to our services, and job applicants. It covers how that personal data may be used, who we share it with and the rights you have in relation to that information. We are committed to protecting your personal data and to being transparent about the types of information that we hold.

PERSONAL DATA THAT WE MAY COLLECT

In the course of our business, we may collect the following personal data from you.

- Contact information such as name and title, email address, address, telephone and mobile number.
- Billing and payment information such as credit card details and billing address.
- Usage data such as information on how you use our website and services.
- Technical data such as IP address, time zone and location, device and software being used to access our website.

- Biographical and personal information from CVs/resumes and job applications, such as date of birth, academic and professional qualifications gained and employment history.

HOW WE COLLECT PERSONAL DATA

We obtain personal data in the following ways:

Website Usage

We use Cookies and other tracking technologies to generate or collect some information from your computer or device automatically as you use our website. Cookies are small data files that are stored on your device. Our website uses such technologies enabled by us or third parties in order to operate and personalize the website, track how you use the site and to serve ads to you on other websites.

We also log and use information about any service errors or interruptions that you have experienced in order to help us create fixes and to make technical improvements to our services.

We use a third party service, HubSpot, for social media marketing, content management, web analytics and search engine optimization. HubSpot sets cookies that track how users interact with our website. This information is anonymized, however, if you have provided personal information to us e.g. by submitting a form on our website, it is possible that HubSpot will be able to identify other interactions that you have with us online.

You can find out more information about HubSpot cookies and how they are used in their privacy policy <https://legal.hubspot.com/privacy-policy>

HubSpot are based in the US and may store your information outside of the EU. HubSpot comply with the Privacy Shield Principles for the transfer of European and Swiss personal data to the US.

We use a third party service, Google Analytics, to collect anonymized data about visitors to our website. The information collected includes the pages you visit, time and date of visit, the device and software being used and partial IP information sufficient for geolocation. They use this data solely on our behalf and this data does not enable you or any other individual user to be identified.

Some of our pages (such as those accepting payment card details and providing access to our customer support service) utilize framing techniques to serve content from our partners while preserving the look

and feel of our website. Please be aware that you are providing your personal data to these third parties and not to us.

For more information about how we use cookies, see our Cookies Policy <https://www.approov.io/cookies>

Online Forms

If you complete one of the forms on our website (for example, contact us form, demo download form or custom pricing request form) details of the information you submit will be stored in our HubSpot CRM. We receive an email notification when a form has been submitted on our website, and this will contain a summary of the information provided.

Your personal data is stored securely by HubSpot in accordance with their privacy policy <https://legal.hubspot.com/privacy-policy>.

Customer Subscription

We use a third party service, ChargeBee, to manage our subscription billing. When you sign up for a trial or paid subscription of Approov, ChargeBee will collect contact and billing information directly from you on our behalf. Your contact and billing information are stored securely by ChargeBee in accordance with their privacy policy <https://www.chargebee.com/privacy/>. They are not permitted to store, retain, or use the information you provide except for the sole purpose of credit card processing on our behalf.

Approov Blog

We use HubSpot to host and run the Approov blog. This allows us to monitor the effectiveness of each article and to improve our content.

Newsletter sign-up

We use HubSpot to manage sign-ups for our newsletter. Hubspot will collect contact information, such as your name and email address, directly from you when you subscribe to receive our newsletter and this is stored in our CRM. We receive an email notification when someone subscribes to our newsletter and this will contain a copy of your contact information.

Helpdesk request

We use a third party service, ZenDesk, to manage technical support requests. When you submit a support request on our website, ZenDesk will collect contact information directly from you on our behalf. Your contact information and request details are stored securely by ZenDesk in accordance with their privacy policy

<https://www.zendesk.co.uk/company/customers-partners/privacy-policy/>.

ZenDesk are based in the US and may store your information outside of the EU. ZenDesk comply with the Privacy Shield Principles for the transfer of European and Swiss personal data to the US.

Social Media Channels

We use HubSpot to manage our social media channels, such as Twitter, Google+, and LinkedIn. If you interact with us through our connected social channels, a record of this will be stored in HubSpot.

Targeted Advertising

We use a third party service, Adroll Group, to manage advertising of our services on other sites. When you visit our website, Adroll may use cookies and tracking pixels for targeted advertising purposes. You can find out more in their privacy policy: <https://www.adrollgroup.com/privacy>.

To opt out of targeted advertising, please visit:

- The DAA opt-out site at <http://www.aboutads.info>
- the NAI opt-out site at <http://optout.networkadvertising.org>
- In Europe, the EDAA opt-out site at <http://youronlinechoices.eu/>

If you opt out of receiving targeted adverts, you will still be served generic adverts while browsing other sites.

Job Applicants

We collect information directly from you if you apply for a job with us or submit your CV/resume. This will include contact information and biographical information.

INFORMATION PROCESSED ON BEHALF OF A CLIENT

When a client signs up for an Approov account, we collect and process information about their end users; specifically, a mobile device identifier (Device ID) and an IP address. Device IDs are pseudonymised; IP addresses are currently stored in their raw form. Typically, individual users cannot be identified using this data alone.

If you use an app that is using the Approov service, then we will retain the above personal data as long as the Approov account, with which the app is registered, is active. We will also continue to retain this personal data after the account is terminated if it is necessary for tax and financial reporting purposes or to comply with our legal obligations.

HOW YOUR PERSONAL DATA IS USED

Usage and technical data

The anonymized information that we, and third parties we work with, collect about visitors to our website is used to:

- Measure our website traffic and usage;
- To help us measure errors in our services;
- Improve the contents of the website;
- Evaluate marketing activities such as visitor retention, referral evaluation, and channel validation.

Contact and account information

We will use this data to:

- Respond to your queries;
- Allow you to register with us and subscribe to our services;
- Manage and administer your account;
- Send you the sales and technical information required to use our products and services.

Billing and payment information

We will use this data to carry out billing activities.

Biographical data

We will use this data to evaluate your job application and take any next steps, and to evaluate your suitability for roles where you have asked to be considered for future opportunities.

LAWFUL BASIS FOR PROCESSING PERSONAL DATA

We can only process your personal data if we have a lawful basis for doing so. The lawful bases we use for processing your personal data are as follows:

Contractual Necessity, when the processing is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract. This includes registering for our services, responding to enquiries you make and evaluating your suitability for a job if you have submitted an application or CV.

You are not obliged to provide us with any of this information but if you choose not to then we may be unable to provide you with the product or service that you have requested.

Legitimate Interests, when the processing is necessary for our legitimate interests in a way which might be reasonably expected in order for us to run our business. If we process your personal data for these purposes, we will first ensure that your interests, rights and freedoms are not adversely impacted.

Legal Obligation, when the processing is necessary for us to comply with the law (not including contractual obligations).

Consent, when you have given clear consent for us to process your personal data for a specific purpose. For example, when you complete an enquiry form on our website to subscribe to receive our newsletter.

Where we process your personal data based only on your consent, you can withdraw this consent at any time by contacting us.

SHARING YOUR DATA WITH OTHERS

We sometimes share your personal data with trusted third party providers such as IT companies who support our services and direct marketing companies who help us manage our newsletter service. We will only provide them with the information that they need to carry out their services and they may only use your data for the purpose(s) specified in our contract with them. When we stop using their services, any data they hold about you must either be deleted or anonymized, unless they require it for tax or financial reporting or to meet legal obligations

Within CriticalBlue, personal data will only be shared between members of staff who legitimately need the information to carry out their normal duties in order to provide you with the service you have requested.

In the event of a merger with or an acquisition by another company, your personal data will, where relevant, be transferred to the new owner under the terms of this privacy notice.

We may disclose your personal data if we conclude that it is required by law, such as to comply with a subpoena or similar legal process, or when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.

TRANSFER OF PERSONAL DATA TO OTHER COUNTRIES

Our head office is based in Edinburgh, UK and we have an office in the US. Customer data will be shared with colleagues in the US who have a legitimate business need to access that data, such as customer onboarding or technical support.

In limited and necessary circumstances, your information may be transferred outside of the EU or to an international organisation to comply with our legal or contractual requirements, for example, in the event of the merger with or acquisition by another company.

HOW LONG PERSONAL DATA IS KEPT

We will retain your personal data for no longer than is necessary. This will depend on why it was collected, or if we have a continuing lawful basis to do so (such as to fulfil a contract between us, perform a service you requested or for our legitimate interests). Your personal data will be deleted if we no longer have a valid reason or legal requirement to process it.

Information received from unsuccessful job applicants will be retained for the statutory recommended period. If you have given us consent to hold your data for longer in order to be considered for future opportunities then we will retain it for the agreed period. You have the right to withdraw that consent at any time.

If, in the future, we intend to process your personal data for a purpose other than that for which it was collected we will provide you with information on that purpose prior to doing so.

INFORMATION SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data 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.

YOUR RIGHTS

You have a number of rights with regard to your personal data:

- The right to be informed about the collection and use of your personal data.
- The right to access the personal data that we hold about you.
- The right to have your personal data rectified if it is inaccurate or incomplete.
- The right to have your personal data erased, in certain circumstances.
- The right to restrict or suppress your personal data, in certain circumstances.
- The right to object to us processing any personal data that we process where we are relying on legitimate interests as the legal basis of our processing.
- The right to data portability.
- The right to ask us not to use your personal data for marketing purposes.

Further information about your rights can be found on the ICO's website <https://ico.org.uk/>

Please contact us if you wish to exercise any of these rights, our contact details are listed at the end of this policy. There is no charge for us providing you with this data and it will usually be provided within a month of the request (unless the request is unfounded or excessive).

In order to protect your data, we may ask for proof of your identity before proceeding with any request you make under this privacy notice.

If you have provided consent for the processing of your data you have the right (in certain circumstances) to withdraw that consent at any time. This will not affect the lawfulness of the processing before your consent was withdrawn.

You have the right to lodge a complaint to the Information Commissioner's Office if you are unhappy with the way we have processed your personal data.

CHILDREN'S PRIVACY

Our website and services are not aimed at children under the age of 16 and to the best of our knowledge we have not gathered personal data from any children under the age of 16. If you have reason to believe that a child under the age of 16 has submitted personal data to us, please contact us at privacy@criticalblue.com so that we can delete it.

LINKS

Our website contains links to other sites. Please be aware that we are not responsible for the content or privacy practices of other sites. We encourage you to read the privacy statements on the other websites you visit.

CHANGES TO OUR PRIVACY POLICY

We'll keep this information up to date and any changes we make will be posted on our website.

Please contact us if you would like to see previous versions of our privacy policy.

WHO WE ARE AND HOW TO CONTACT US

The Approov website, branding, and digital properties belong to CriticalBlue Ltd (Company registered in Scotland, No. SC224237). As controller, CriticalBlue Ltd are responsible for, and control the processing of, your personal data.

If you have any questions or concerns regarding this privacy notice, please contact us:

Email: privacy@criticalblue.com

Post: Chief Technical Officer, CriticalBlue Ltd, 181 The Pleasance, Edinburgh, EH8 9RU, United Kingdom.