

This EU Privacy Notice applies to Disperse's processing of personal data from 25 May 2018

Version: 1

Disperse.io LTD

EU PRIVACY NOTICE

1. Who is responsible for processing your data?
2. Categories and sources of personal data and purposes and lawful basis for processing.
3. Sharing of your information
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1. WHO IS RESPONSIBLE FOR PROCESSING YOUR DATA AND HOW TO CONTACT US

This notice ("**Notice**") describes the steps Disperse.io ("**Disperse**", "**Company**", "**we**", "**our**", or "**us**") take to protect the personal data that we process about our customers, individuals related or adverse to our customers and other business contacts. In this capacity, Disperse acts as a data controller. Disperse's main establishment is at 2 Stephen St, W1T 1AN, London.

Disperse is committed to the protection of the personal data that we process about you in line with the data protection principles set out in the European Union's ("**EU**") General Data Protection Regulation 2016 ("**GDPR**") and the UK Data Protection Act 2018.

Disperse takes its data processing obligations and our legal, professional and ethical duties and obligations to protect personal data seriously. We have a robust information security management program in place to protect the personal data and other information that we process. These measures are monitored, reviewed and regularly enhanced in order to meet our professional responsibilities and the needs of our customers.

The core business of Disperse is construction technology and does not involve the large-scale processing of personal data.

2. WHAT PERSONAL DATA WE COLLECT AND WHY?

We may source, use and otherwise process your personal data in different ways. In all cases we are committed to protecting the personal data that we process.

In each of the sections listed below, we describe how we obtain your personal data and how we will treat it.

Section 2.1 Representatives of our Existing or Prospective Customers, Distributors and Vendors

Section 2.2 Personal Data related to the Services that we Offer

Section 2.3 Visitors to our Premises

Section 2.4 Website Visitors

2.1 Representatives of our Existing or Prospective Customers and Vendors

A - Sources of personal data

We may obtain your personal data from the following sources:

- a) from you directly;
- b) from a company that employs you, if you are an employee of our customer and/or contractor;
- c) from visitors to our EU based offices;
- d) from partners with whom we have a relationship;
- e) during networking events that we have either hosted, or sponsored, or attended; and/or
- f) from publicly available sources (for example, your company website or social media sites).

B - Personal data that we collect and process

We may collect the following categories of personal data relating to our corporate customers' employees, officers, authorised signatories, and other associated individuals. This may include:

- a) name;
- b) name of employer;
- c) business address;
- d) business email address;
- e) business telephone number;

- f) IP address;
- g) website user activity; and
- h) job title.

C - Why do we collect your personal data and what are our lawful bases for it?

Representatives of our Existing or Prospective Customers, Distributors and Vendors		
<i>We may use your personal data to:</i>	<i>Our lawful basis for doing so is:</i>	<i>Our legitimate interests in doing so are:</i>
Provide you with our services	Legitimate Interest	Efficiently fulfil our contractual and legal obligations Management reporting (including at an intra-group level)
Establish and manage our relationship		Efficiently fulfil our contractual and legal obligations
Learn about how our products are or may be used		Account management Exercise or defend legal claims Understand the market in which we operate Management reporting Provide technical support Account management
Manage security		Managing security, risk and crime prevention,

		including anti-money laundering
		Management reporting
Let you know about our products and events that may be of interest to you by letter, telephone, email or other forms of electronic communication		Promote our products and services Management reporting (including at an intra-group level)

If you object to us using your contact details for these purposes, including direct marketing, please send an email to us using the following email address: support@disperse.io.

Where we use your email to communicate marketing information to you we may need to obtain your prior consent to send such communications where required to do so by law.

2.2 Personal data related to the services that we offer

A - Sources of personal data

Your personal data may be processed when our customers use our services. Disperse processes images on construction sites that may capture images of individuals. The images are used for the provision and maintenance of our software and also to develop and improve our products and services, but the images of individuals are not used to provide the service.

B - Personal data that we collect and process

We may collect the following categories of personal data relating to our corporate customers' end-users:

- a) name;
- b) email address;
- c) IP address;
- d) user activity;
- e) Camera footage and environment scans;
- f) login credentials (username, password etc.).

C - Why do we collect your personal data and what are our lawful bases for it?

Data relating to you flowing through the products and services we provide our corporate customers

<i>We may use your personal data to:</i>	<i>Our lawful basis for doing so is:</i>	<i>Our legitimate interests in doing so are:</i>
Provide our customers with our services		Efficiently fulfil our contractual and legal obligations Management reporting
Establish and manage our relationship	Legitimate Interest	Efficiently fulfil our contractual and legal obligations Account Management Exercise or defend legal claims Understand the market in which we operate Management reporting
Learn about how our products and services are or may be used		Understand the market in which we operate Management reporting Account Management
Demonstration to prospective customers	Legitimate Interest	Promote and market our products to prospective customers

2.3 Visitors to Our Premises

A - Sources of personal data

We may obtain your personal data from you directly and/or from our systems' records.

B - Personal data that we collect and process

- a) name;
- b) business contact details;
- c) organisation;
- d) role; and/or
- e) image (for example, from cameras).

C - Why do we collect your personal data and what are our lawful bases for it?

Visitors to our Premises		
<i>We may use your personal data to:</i>	<i>Our lawful basis for doing so is:</i>	<i>Our legitimate interests in doing so are:</i>
Manage security	Legitimate Interest	Managing security, risk and crime prevention
Maintain records of visitors to our premises		Management reporting

If you object to us using your personal data for these purposes, please send an email to us using the following email address: support@disperse.io.

2.4 WEBSITE VISITORS

A - Sources of personal data

We may obtain your personal data from the following sources:

- a) from you directly (for example, by filling in forms on the website).
- b) when you register to use the website or for a trial period;
- c) subscribe to any of our services;
- d) request further information via the website
- e) when you report a problem with the website;
- f) from your device or browser; and/or

g) if you contact us, we may keep a record of that correspondence.

B - Personal data that we collect and process

- a) name;
- b) username;
- c) email address;
- d) phone number;
- e) postal address;
- f) operating system;
- g) browser type;
- h) products or services you viewed or searched for;
- i) other website data, including page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page;
- j) cookie data (for more information please see our Cookie Notice)
- k) preferences regarding online marketing; and/or
- l) IP address.

C - Why do we collect your personal data and what are our lawful bases for it?

Website Visitors		
<i>We may use your personal data to:</i>	<i>Our lawful basis for doing so is:</i>	<i>Our legitimate interests in doing so are:</i>
Provide our website services to you, your employer or our clients	Legitimate Interest	Website management Promote our products and services Account management Notifying you of any changes to our products
Establish and manage our relationship		Understand the market in which we operate

		Management reporting Account management Make suggestions and recommendations to you about products or services that may interest you
Learn about our websites(s) users' browsing patterns and the performance of our website(s)		Website management, including troubleshooting, data analysis, testing, research, statistical and survey purposes
Manage security		Managing security, risk and crime prevention Management reporting on security incidents
Let you know about our products, services and events that may be of interest to you by letter, telephone, email or other forms of electronic communication		Promote our products and services Management reporting
Learn about how our products or services may be used		Understand the market in which we operate Management reporting

If you object to us using your personal data for these purposes, including direct marketing, please send an email to us using the following email address: support@disperse.io.

We will seek your prior consent, where required to do so by law, where we:

- a) use cookies or similar technologies to fulfil this purpose; and/or
- b) use your email to communicate marketing information to you.

3. WHO DO WE SHARE YOUR PERSONAL DATA WITH

We do not sell your personal data to third parties. We will never sell personal data collected for purposes outside of marketing, or otherwise obtained from third parties, nor knowingly permit it to be used for marketing purposes by any person outside Disperse.

Intra-group Transfers to our Affiliates

We may share your personal data with our affiliates and subsidiaries, as set out in Annex 1. International transfers within the Company are governed by intra-group controller arrangements and processor agreements, as appropriate. Contractual arrangements governing international transfers of personal data to our offices outside the EU are discussed in Section 4 below.

Our Service Providers

We may disclose information about you to organisations that provide a service to us, on the understanding that they will keep the information confidential and will comply with the GDPR and other relevant data protection laws.

We may share your information with the following types of service providers:

- a) our distributors who may contact you regarding Disperse products and services, if you indicated your desire to receive such offers;
- b) technical support providers who assist with our website and IT infrastructure;
- c) third party software providers, including 'software as a service' solution providers, where the provider hosts the relevant personal data on our behalf;
- d) professional advisers such as solicitors, accountants, tax advisors, auditors and insurance brokers.
- e) our advertising and promotional agencies and consultants and those organisations selected by us to carry out marketing campaigns on our behalf; and/or
- f) providers that help us store, collate and organise information effectively and securely, both electronically and in hard copy format (e.g. cloud service providers), and for marketing purposes.

Company Mergers and Takeovers

We may transfer your personal data to potential purchasers and their advisors, subject to appropriate confidentiality obligations, in the event we decide to dispose of all or parts of our business. Any personal data that may be transferred to a potential merger partner will be limited to that which is necessary for the transaction to proceed, and will be safeguarded by protective contractual measures, including the EU Standard Contractual Clauses where required.

Legal and Regulatory Enforcement

If you have breached the terms of an agreement between us and you, abused your rights to use the website, or violated any applicable law. Your information may be shared with competent authorities and with any third party, if we believe it is necessary or justified.

4. TRANSFERS OF PERSONAL DATA OUTSIDE THE EU/EUROPEAN ECONOMIC AREA

If and when transferring your personal data outside the EU or European Economic Area (“**EEA**”), we will only do so using one of the following safeguards:

- a) the transfer is to a non-EEA country that has been the subject of an adequacy decision by the EU Commission;
- b) the transfer is covered by a contractual agreement, which covers the GDPR requirements relating to transfers to countries outside the EEA;
- c) the transfer is to an organisation which has binding corporate rules approved by an EU data protection authority; or
- d) the transfer is to an organisation in the US that is EU-US Privacy Shield certified.

International transfers to our affiliates, subsidiaries and parent company are governed by EU Commission-approved Standard Contractual Clauses for Controllers and, where relevant, for Processors.

We may also transfer your data to third-party vendors outside the EU, such as our customer relationship management system and cloud provider e.g. Amazon Web Services (AWS). Where we do so, the Standard Contractual Clauses or other safeguards approved by the EU Commission are in place to safeguard that personal data.

You may request a copy of the EU Standard Contractual Clauses or other relevant international transfer documentation by contacting the DPO: support@disperse.io.

5. RETENTION PERIOD

We will keep and process your personal data only for as long as is necessary for the purposes for which it was collected in connection with your relationship with us, unless we have a legal right or obligation to retain the data for a longer period, or the data is necessary for the establishment, exercise or defense of legal claims or our legitimate interests.

Users and their contact data are removed within a business day from all databases, except server logs.

6. YOUR RIGHTS

If the EU's GDPR applies to the processing of your personal data, the GDPR and other applicable EU and Member State data protection laws provide you with certain rights in relation to the processing of your personal data, including to:

- **Request access to personal data about you** (commonly known as a “**data subject access request**”). This enables you to receive a copy of the personal data we hold about you, and to check that we are lawfully processing it.
- **Request rectification, correction, or updating to any of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request personal data provided by you to be transferred in machine-readable format (“data portability”).** This enables you to port personal data that you provided to us to another supplier.
- **Request erasure of personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove personal data where you have exercised your right to object to processing (see below).
- **Request the restriction of processing of your personal data.** This enables you to ask us to suspend the processing of personal data about you (e.g. if you want us to establish its accuracy or the reason for processing it).
- **Object to the processing of your personal data in certain circumstances.** This right may apply where:
 - the processing of your personal data is based on the legitimate interests of Company, as explained above,
 - decisions about you are based solely on automated processing, including profiling, or
 - your personal data is being processed for direct marketing purposes.

These rights are not absolute and are subject to various conditions under:

- applicable data protection and privacy legislation; and
- the laws and regulations to which we are subject.

Where consent is the basis for processing personal data, you may decline to give your consent, or to withdraw consent to the processing at any time.

These rights are not absolute and are subject to various conditions under applicable data protection and privacy legislation and the laws and regulations to which we are subject in our business activities.

In some cases, the exercise of these rights (for example, erasure, objection, restriction or the withholding or withdrawing of consent to processing) may make it impossible for us to achieve the purposes identified in Section 2 of this Notice.

If at any time you decide that you do not want to be contacted for any purpose or if you would like to exercise any of your rights as set out above, you can contact us by emailing the following email address: support@disperse.io.

Any individual wishing to assert his or her rights under the GDPR should address the relevant request to:

By post:

Support Team

2 Stephen St, W1T 1AN, London

By email: support@disperse.io

Data subjects also have the right to submit a complaint concerning our processing of their personal data to the appropriate supervisory authority.

ANNEX 1: DISPERSE ENTITIES

EU ENTITIES

Disperse Entity
Disperse.io LTD

Country
England

ENTITIES OUTSIDE THE EU

Disperse Entity
Disperse LLC
Disperse.io LTD Representative Office

Country
Armenia
Bosnia and Herzegovina