

Privacy Engine Privacy Statement

Last updated 12 May 2021

Introduction

Welcome to Privacy Engine. This policy explains how we handle and use your personal information and your rights in relation to that information.

Privacy Engine (“The Organisation”, “we”, “our” or “us”) is committed to protecting and respecting your privacy.

This Privacy Statement explains why and how we will use the personal information that we have obtained from you or others, with whom we share it and the rights you have in connection with the information we use. Please read the following carefully.

This policy describes the way we handle and use the personal information that we obtain from all the different interactions you may have with us as a client or when you contact us.

Your privacy on the Internet is important to us. As the Internet offers the ability to collect certain types of information about users, we want you to understand the terms and conditions surrounding the capture, use and processing of any information relating to you which we gather.

Privacy Engine complies with the requirements of the relevant European Data Protection legislation based on the jurisdiction of our main establishment in Ireland namely:

- The General Data Protection Regulation (2016/679)
- The Irish Data Protection Act (2018)
- The EC (Electronic Communications Regulation) Act 2011.

Privacy Engine have registered offices at: 77 Sir John Rogerson's Quay, Dublin 2, Ireland, D02 F540, Ireland and we are a company registered in Ireland under company number 529183. We act as the data controller when processing your data on www.privacyengine.io.

This policy was last updated on the date that appears at the top of this page.

What Information Does Privacy Engine Collect?

Where personal data is provided by a privacyengine.io visitor, the system collects the following pieces of personal information through the web site such as:

- First Name
- Surname

- Email
- Email outside of office hours
- Company
- Telephone Number
- Message or query entered by the visitor

We gather various types of information, including information that identifies or may identify you as an individual (“Personal Information”) as explained in more detail below.

When you use the Website:

When you visit the Website, we collect certain information related to your device, such as and not limited to the following: your device’s IP address, referring website, what pages your device visited, and the time and date that you visited our website using this device.

How do we use the information?

We will use the information we collect via our Website:

- To administer our website and for internal operations, including troubleshooting, data analysis, testing, statistical and survey purposes
- To improve our website to ensure that content is presented in the most effective manner for you and for your computer
- For trend monitoring, marketing and advertising
- For purposes made clear to you at the time you submit your information – for example, to provide you with information you have requested about our Services, and
- As part of our efforts to keep our website secure.

Our use of your Personal Information may be based on our legitimate interest to ensure network and information security, and for our direct marketing purposes on the basis that you have consented to such communication (e.g., when you request an onboarding).

The Periods For Which We Retain Your Information

We are obliged to retain certain information to ensure accuracy, to help maintain quality of service and for legal, regulatory, fraud prevention and legitimate business purposes.

Other information will be retained for no longer than is necessary for the purpose for which it was obtained by us or as required or permitted for legal, regulatory, fraud prevention and legitimate business purposes. In general, we will hold this information for a period of seven years, unless we are obliged to hold it for a longer period under law or applicable regulations.

We will not hold your personal information in an identifiable format for any longer than is necessary for the purposes for which we collected it. For certain purposes we retain your

personal information indefinitely (e.g., to suppress marketing messages).

How do we share and disclose information to third parties?

Privacy Engine will use third-party tools to improve and enhance your ability to communicate with us. For example, we use Intercom and HubSpot, which are third party tools to provide you with our web chat services. These third parties may process/transfer your data to countries outside of the E.U. but only in accordance with the relevant legislation and using the appropriate legal mechanisms to safeguard the transfer.

We control your personal data throughout and assure you that it will only be used for the purpose outlined above. All processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures. For more information, please contact us at dataprotection@privacyengine.io

We do not rent or sell your Personal Information to anyone. We may share and disclose information (including Personal Information) about our customers in the following limited circumstances:

Business Transfers:

We may choose to buy or sell assets and may share and/or transfer customer information in connection with the evaluation of and entry into such transactions. Also, if we (or our assets) are acquired, or if we go out of business, enter bankruptcy, or go through some other change of control, Personal Information could be one of the assets transferred to or by a third party.

Privacy Engine:

We reserve the right to access, read, preserve, and disclose any information as necessary to comply with law or court order; enforce or apply our agreements with you and other agreements; or protect the rights, property, or safety of Privacy Engine, our employees, our users, or others.

Disclosures for National Security or Law Enforcement:

Under certain circumstances, we may be required to disclose your Personal Information in response to valid requests by public authorities, including to meet national security or law enforcement requirements.

Security

We use appropriate technical, organisational and administrative security measures to protect any information we hold in our records from loss, misuse, and unauthorised access, disclosure, alteration and destruction.

Unfortunately, no company or service can guarantee complete security. Unauthorised entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time. Among other practices, your account is protected by a password for

your privacy and security. You must prevent unauthorised access to your account and Personal Information by selecting and protecting your password appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account.

Cookies

We do use cookies on our website, for further details please see our cookie policy.

Marketing Communications

You can opt-out of receiving certain promotional or marketing communications from us at any time, by using the unsubscribe link in the emails communications we send.

If you have an account for our Services, including PrivacyEngine we will still send you non-promotional communications, like service-related emails.

Your Data Subject Rights

Under the General Data Protection Regulation (GDPR) and The Data Protection Act 2018 (DPA2018) you have a number of rights with regard to your personal data. You have the right to request from us:

- access to your personal data
- rectification of your personal data where it is incorrect
- erasure of your personal data in certain circumstances,
- the right to restrict processing, object to processing as well as the right to data portability in certain circumstances.

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

You have the right to lodge a complaint to the Data Protection Commission if you believe that we have not complied with the requirements of the GDPR or DPA 18 with regard to your personal data.

How Can I Exercise My Data Subject Rights?

A request can be submitted to dataprotection@privacyengine.io, indicating the scope of personal data required.

We will respond to all as quickly as possible, but in any event, within one month of receipt of the validated request.

International Data Transfers

Privacy Engine do not transfer your personal information outside of Europe however as mentioned above some of our third-party processors may do so.

All information you provide to us is stored on our secure servers which are located within the European Economic Area (EEA).

If at any time we transfer your personal information to, or store it in, countries located outside of the EEA (for example, if our hosting services provider changes) we will amend this policy and notify you of the changes. We will also ensure that appropriate safeguards are in place for that transfer and storage as required by applicable law. This is because some countries outside of the EEA do not have adequate data protection laws equivalent to those in the EEA. If we transfer your personal information to the United States of America, we will only send the personal information to companies which we have safeguards in place in accordance with applicable law, such as Standard Contractual Clauses. Where they apply to our data transfer activities, we will rely on adequacy decisions by the European Commission about certain countries for data transfers to countries outside the EEA.

Children

We do not knowingly collect or solicit personal information from anyone under the age of 18. If you are under 18, please do not attempt to register for the Services or send any Personal Information about yourself to us. If we learn that we have collected Personal Information from a child under age 18, we will delete that information as quickly as possible. If you believe that a child under 18 may have provided us with Personal Information, please contact us at dataprotection@privacyengine.io

Security and Links to Other Websites

We take the security of your personal information seriously and use a variety of measures based on good industry practice to keep it secure. Nonetheless, transmissions over the internet and to our Site may not be completely secure, so please exercise caution. When accessing links to other websites, their privacy policies, not ours, will apply to your personal information.

We employ security measures to protect the personal information you provide to us, to prevent access by unauthorised persons and unlawful processing, accidental loss, destruction and damage.

The transmission of information via the internet is not completely secure. Although we will do everything possible to protect your personal information, we cannot guarantee the security of any personal information during its transmission to us online. You accept the inherent security implications of using the internet and will not hold us responsible for any breach of security unless we are at fault.

If you are using a computer or terminal in a public location, we recommend that you always log out and close the website browser when you complete an online session for your security. In addition, we recommend that you take the following security measures to enhance your online safety:

- When creating a password, we recommend use at least 8 characters with a combination of letters and numbers.
- We recommend you frequently change your password.
- Keep your passwords private. Remember, anyone who knows your password may access your account.
- Avoid using the same password for multiple online accounts.
- We will never ask you to confirm any account or credit card details via email. If you receive such an email claiming to be from Privacy Engine asking you to do so, please ignore it and do not respond and report it to us.

Our Site may contain links to other websites run by other organisations which we do not control. This policy does not apply to those other websites, so we encourage you to read their privacy policies. We specifically disclaim responsibility for their content, privacy practices and terms of use, and we make no endorsements, representations or promises about their accuracy, content or thoroughness. Your disclosure of personal information to third party websites is at your own risk.

Changes to this Statement

We reserve the right to change this policy at any time by notifying users of the existence of a revised statement. By continuing to use the Privacy Engine Website, you agree to be bound by the amended policy. We will inform you via a notice on the website when a policy is updated.

Please refer any questions in relation to this Policy, or to Privacy Engine's processing of your personal data, to dataprotection@privacyengine.io