

RightsZone Limited –
PRIVACY and Data Protection Policy
2nd May 2018

INTRODUCTION AND DEFINITIONS

1. Introduction

This Policy sets out the obligations of RightsZone.

RightsZone Ltd. a company registered in United Kingdom under number 10614925., whose registered office is at Stag Gates House, 63/64 The Avenue, Southampton, SO17 1XS (“the Company”) regarding data protection and the rights of customers, business contacts and website users (“data subjects”) in respect of their personal data under EU Regulation 2016/679 General Data Protection Regulation (“GDPR”).

The GDPR defines “personal data” as any information relating to an identified or identifiable natural person (a “data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

This Policy sets the Company’s obligations regarding the collection, processing, transfer, storage, and disposal of personal data. The procedures and principles set out herein must be followed at all times by the Company, its employees, agents, contractors, or other parties working on behalf of the Company.

The Company is committed not only to the letter of the law, but also to the spirit of the law and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals.

By visiting www.RightsZone.co.uk & the RightsZone App Exchange listing at <https://appexchange.salesforce.com/appxListingDetail?listingId=a0N3A00000Ecs09UAB> (“our sites”) and/or by completing our purchase order, you are accepting and consenting to the practices described in this policy.

If you have questions about correcting or deleting your personal data please refer to sections 3 and 8 below.

References in this policy to “**data protection law**” mean (as applicable) the Data Protection Act 1998, the General Data Protection Regulation (Regulation (EU) 2016/679) and all related data protection legislation having effect in the United Kingdom from time to time.

1 OUR DETAILS

- 1.1 The data controller is RightsZone Ltd of Stag Gates House, 63/64 The Avenue, Southampton, SO17 1XS
- 1.2 Our nominated representative is Ruth Tellis, email ruth@rightszone.co.uk
- 1.3 Our data protection officer is Ruth Tellis, email ruth@rightszone.co.uk

2 HOW WE USE YOUR INFORMATION

- 2.1 The following sections set out why we are processing your information, what information we collect, the legal basis for and duration of our processing of your information and (if applicable) who your information will be shared with and where those recipients are based.

Which information do we process and for what purpose?

- 2.2 We process the following information from you:

- 2.2.1 **Information you give us.** This is information about you that you give us by filling in our purchase order and forms on our site. It includes information you provide when you

register to use our services, request marketing information, enter a competition, promotion or survey. The information you give us may include your name, address, job description, email address, phone number.

- 2.2.2 We process information you give to us for the following purposes:
 - 2.2.2.1 to supply you with the goods and/or services you have purchased or requested from us;
 - 2.2.2.2 to manage your account with us; and
 - 2.2.2.3 to notify you about changes to our service.
 - 2.2.2.4 To let you know about events and promotions
- 2.2.3 **Information we collect about you.** Like most other website operators, we collect non-personally identifying information of the sort that web browsers and servers typically make available. This includes technical information, such as your IP address and your login information and information about your visit, such as records of how you navigate the pages on our site and how you interact with the pages.
- 2.2.4 We process information we collect about you for the following purposes:
 - 2.2.4.1 to allow us to administer the account you hold with us;
 - 2.2.4.2 to improve our services;
 - 2.2.4.3 to comply with our regulatory and legal obligations to process and keep a record of your data;
 - 2.2.4.4 to ensure that content from our site is presented in the most effective manner for you and for your computer.

What are the grounds for processing your information?

- 2.3 We are processing your data on the following ground(s):
 - 2.3.1 you have consented to the processing for the purposes stated in section 2.2.2, above.
 - 2.3.2 the processing is necessary for the performance of the contract (RightsZone Purchase Order, RightsZone Limited Terms and Conditions for Use of the Rightszone Hosted Software Application and SFDC Service Agreement) between you and us.
 - 2.3.2.1 the processing relates solely to our organisation in connection with our purposes; and
 - 2.3.2.2 the personal data is not disclosed to third parties without your consent;

Duration and further processing

- 2.3.3 The Company shall not keep personal data for any longer than is necessary in light of the purpose or purposes for which that personal data was originally collected, held, and processed.
- 2.3.4 When personal data is no longer required, all reasonable steps will be taken to erase or otherwise dispose of it without delay.

Who is your information shared with?

- 2.4 Your personal information is not shared with anyone except where we are required to do so to comply with the law, to protect our rights, or to improve and expand our products and services.
- 2.5 Personal information is not retained on our systems unless it is required for the ongoing operation of one of our services (including where we are legally required to keep a record of your data).

2.6 In order to achieve the purpose(s) set out in section 2.2 above, we will share your data only with the following people or group of people:

2.6.1 Salesforce

To the best of our knowledge, understanding and belief, your information will not be transferred outside of the European Economic Area or to any country which is not approved by the European Commission. If this changes then we will let you know.

Some Salesforce servers are based outside of the EEA but we are authorised to transfer your information to them because the transfer is necessary for the performance of the contract between us.

Automated decision making

2.7 We do not make automated decisions about you based on your information.

3 YOUR RIGHTS

3.1 Under data protection law you have the following rights:

3.1.1 the right to be informed as to what we do with your information. This includes but is not limited to the right to know what information we gather, process and store, what we do with it, who we share it with and how long we keep it for;

3.1.2 if we are processing your data on the basis of your consent then you have the right to withdraw that consent at any time. Consent can be withdrawn by closing your account with us and notifying us using the details set out in section 8 below. The lawfulness of our historic processing based on your consent will not be retrospectively affected by your withdrawal of consent;

3.1.3 the right to access a copy of your information which we hold. This is called a 'subject access request'. Additional details on how to exercise this right are set out in section 5, below;

3.1.4 the right to object to processing of your information where it is likely to cause or is causing damage or distress;

3.1.5 the right to prevent us processing your information for direct marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us using the details set out in section 8, below;

3.1.6 the right, in certain circumstances, to have your information rectified, blocked, erased or destroyed if it is inaccurate; and

3.1.7 the right, in certain circumstances, to claim compensation for damages caused by us breaching data protection law.

3.2 From 25 May 2018 you will have the following additional rights under data protection law:

3.2.1 enhanced rights to request that we erase, rectify, cease processing and/or delete your information; and

3.2.2 in certain circumstances, the right to request the information we hold on you in a machine-readable format so that you can transfer it to other services. This right is called 'data portability'. Additional details on how to exercise this right are set out in section 5, below.

3.3 You also have the general right to complain to us (in the first instance) and to the Information Commissioner's Office (if you are not satisfied by our response) if you have any concerns about

how we hold and process your information. Our contact details are set out in section 8, below. The Information Commissioner's Office website is www.ico.org.uk.

- 3.4 For further information on your rights under data protection law and how to exercise them, you can contact Citizens Advice Bureau (www.citizensadvice.org.uk) or the Information Commissioner's Office (www.ico.org.uk).

4 **COOKIES**

- 4.1 Our site uses cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our site and also allows us to improve our site.
- 4.2 Visitors to our site who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using our site. This will mean that some features of our site and service may not function properly without the aid of cookies.

5 **ACCESS TO INFORMATION**

- 5.1 Under data protection law you can exercise your right of access by making a written request to receive copies of some of the information we hold on you. You must send us proof of your identity, or proof of authority if making the request on behalf of someone else, before we can supply the information to you. Requests should be sent to Ruth Tellis, email ruth@rightszone.co.uk

6 **DATA SECURITY**

We will always store your digital information on secure servers. Unfortunately, however, the transmission of information via the internet is not completely secure. Although we will do our best to protect your information, we cannot guarantee the security of your information transmitted to our site or otherwise to our servers (such as by email). Any such transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

7 **CHANGES TO OUR PRIVACY POLICY**

Any material changes we may make to our privacy policy in the future will be posted on this page and by email. Please check back frequently to see any updates or changes to our privacy policy.

8 **CONTACT**

- 8.1 Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Ruth Tellis, email ruth@rightszone.co.uk