

## Privacy Policy.

This privacy policy applies to [www.processCentral.co](http://www.processCentral.co) (the "Site"), a website operated by Point One (Holdings) Limited (the "Company," "us", "we", or "our") for the delivery of information to you or to your specified audience(s) ("End User", "you").

The Site also includes our subdomains, e.g. [company-name].processcentral.co.

The Site provides the "Service" as defined in the [Terms & Conditions](#).

We respect and protect the privacy of our users. This Privacy Policy explains how we collect and use your information and is part of our [Terms & Conditions](#) when you use our Site or Service.

### Your Consent

By using our Site or Service, you consent to our Privacy Policy. If you don't agree, please don't use our Site or Service.

### What information do we collect?

#### *Personal Data*

"Personal Data" means any information relating to an identified or identifiable natural person. We collect Personal Data from one class of users of the Site: 'consumer-users' who access the information provided ("End Users").

For End Users using **individual** site logins, we collect Personal Data such as names, user names and email addresses. We also collect End User IP addresses, search history within the Site and history of access to the Site Information.

For End Users using **generic** site logins, we do not collect Personal Data. We do collect generic End User IP addresses, search history within the Site and history of access to the Site Information.

If an End User or Customer submits a comment, we will collect it, and the time and place the comment was posted.

## Tracking Data

We and our third-party service providers may collect certain tracking information about the End User use of the Site and Service. For generic login and API Customers, this only applies to the generic End User login. For example, we collect;

- Log information (including your IP address, browser type, Internet service provider, referring and exit pages, operating system, dates/time of access, and related data)
- Information collected by cookies and tracking pixels (as discussed below)
- Web beacons (also called "Internet tags" or "clear gifs"; used to count visitors to our Site and which pages were viewed and links clicked)
- Embedded scripts (code temporarily downloaded onto your device to collect information about your interactions with the Service and thereafter deleted or deactivated)
- Cookie Policy

When you visit our Site we use cookies, or similar technologies like single-pixel gifs and web beacons, to record log data. We use both session-based and persistent cookies. Session-based cookies last only while your browser is open and are automatically deleted when you close your browser. Persistent cookies last until you or your browser delete them or until they expire. They are unique and allow us to do site analytics and customization, among other similar things. If you access our Site through your browser, you can manage your cookie settings.

The cookie service we use:

**Google Analytics** collects information about the use of the Services on our website. Google Analytics collects information such as how often End Users visit the Site, what pages they visit when they do so, and what other sites they used prior to coming to this site. This information from Google Analytics is used only to improve the Site and in anonymous form. Google Analytics collects only the IP address assigned to the End User on the date of visitation to the Site and assigns a user ID code, rather than a name or other identifying information. Information collected through the use of Google Analytics is never combined with personally identifiable information. Google uses this information to analyze End User use of the website, to generate reports about website activities for website operators and to provide further services related to website and internet use. Google may also share such information with third parties to the extent it is legally required to do so and/or to the extent third parties process data on behalf of Google. Although Google Analytics plants a permanent cookie on the End User web browser to identify them as a unique user the next time of visitation to this site, the cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about visits to this site is restricted by the Google Analytics Terms of Use and the Google Privacy Policy and Data Processing Amendment. You can prevent Google Analytics from recognizing you on return visits to this site by disabling cookies on your browser. You may block Google Analytics on some browsers with the help of a browser add-on if you do not want us to use this website analysis. This add-on can be downloaded at: <http://tools.google.com/dlpage/gaoptout?hl=en>. For more

information on Google Analytics and Google's privacy practices, please review their privacy policy at <https://www.google.com/policies/privacy/>.

## How do we use your data?

**Analytics:** We utilize tracking information to access anonymous data to help us understand how the Site is being used, to customize content for you and improve Site content. Google Analytics provides reports to Company with website trends without identifying individual visitors.

**Providing the Services.** We use name and email Personal Data and history of access to identify End Users and enable their feedback using comments. We also use name, email and city location Personal Data to provide training results where quizzes are in use.

## How Do We Share Your Data

We will not sell, rent, or share Personal Data with third parties outside of our Company without your consent, except in the following ways:

**Comments.** If the End User posts a comment in the Site, it will be shared with other End Users accessing the Site (if moderated comments have been opted in by you and you do not require that we contact you prior to publication of comments). Once posted, comments cannot be edited by End Users, but may be deleted for you by contacting [support@processCentral.co](mailto:support@processCentral.co).

## Law Enforcement and Internal Operations

Personal Data may be provided where we are required to do so by law, or if we believe in good faith that it is reasonably necessary (i) to respond to claims asserted against the Company or to comply with the legal process (for example, discovery requests, subpoenas or warrants); (ii) to enforce or administer our policies and agreements with users; (iii) for fraud prevention, risk assessment, investigation, customer support, product development and de-bugging purposes; or (iv) to protect the rights, property or safety of Company, its users or members of the general public. We will use commercially reasonable efforts to notify you about law enforcement or court ordered requests for data unless otherwise prohibited by law. However, nothing in this Privacy Policy is intended to limit any legal defences or objections that you may have to any third party request to compel disclosure of your information.

## Business Transfer

Company may sell, transfer or otherwise share some or all of its assets, including your Personal Data, in connection with a merger, acquisition, reorganization or sale of assets or in the event of bankruptcy. Under such circumstances, Company will use commercially reasonable efforts to notify you in advance if personal information is to be disclosed or transferred and/or becomes subject to a different privacy policy.

## Third Parties

We contract with other companies and individuals to perform functions or services on our behalf. Our categories of service providers includes software maintenance, data hosting, sending email messages, project management and customer service. We necessarily have to share your Personal Data with such third parties as may be required to perform their functions. We take steps to ensure that these parties take protecting your privacy as seriously as we do, including entering into Data Processing Addendum, EU Model Clauses and/or ensuring they have EU-U.S. and Swiss-US Privacy Shield certification since all of our service providers are in the United States.

## How is My Data Protected?

We have implemented reasonable administrative, technical and physical security measures to protect your personal information against unauthorized access, destruction or alteration. For example:

- SSL encryption (https) everywhere where we deal with personal data.
- Password protection on your Site if required.
- Data is kept on secure, encrypted servers, located in the US.
- Restricting staff access to Personal Data protected by password logs.
- Regular staff privacy and security training.

As no security system can be 100% effective, we cannot completely guarantee the security of any information we store, process or transmit.

## Right to Remove or Withdraw Consent.

You have the right to withdraw consent where such consent is required to share or use data and you may request that we delete any of your End User Personal Data.

If you would like to delete comments posted to the Site, please contact [support@processCentral.co](mailto:support@processCentral.co).

If you would like to terminate your agreement in accordance with the [Terms & Conditions](#), we will provide you appropriate output of all Site content where requested and available, remove all data provided by you to us within 90 days unless specified otherwise and notify you of such in writing.

## Right to Redress

If you are a subject of the European Union or European Economic Area and Switzerland and you believe we have violated any data protection laws that apply to you, you have a right to file a complaint. Please contact the Information Commissioner's Office in the United Kingdom.

## **Processing End User Data**

Our Services may involve the processing of Personal Data of End Users. When we do so, we are acting as processors for the controllers of such data. As such, we take steps to ensure that Personal Data subject to GDPR is processed in accordance with controller instructions and GDPR such as entering into a Data Processing Addendum incorporating EU Standard Contractual Clauses governing the processing, transmission and use of such End User Personal Data. If you wish to exercise your data subject rights to review, rectify, delete or port your End User Personal Data please contact the controller to make such request. If you make the request to us, we will work with the controller to process and evaluate such request to confirm whether deletion is required by GDPR.

## **Third Party Websites**

We may link to other websites. When you click on one of these links, you are 'clicking' to another website. Company does not control the data collection or privacy practices of such third party sites. We encourage you to read the privacy policies of any third party sites, as their collection, use and storage practices and policies may differ from ours.

## **Minors Under 16 Years of Age**

Company does not knowingly collect or store any personal information from or about children under the age of 16.

If you believe a child under the age of 16 has under any circumstances provided us with personal information and data, a parent or legal guardian can email us at [support@processCentral.co](mailto:support@processCentral.co) to request that their children's information be deleted from our records.

## **Changes to our Privacy Policy**

Company reserves the right to amend this Privacy Policy at any time. If Company makes material changes to its Privacy Policy, we will notify you by (1) changing the Effective Date on our Privacy Policy and provide additional notification either (1) via email or other means as we may deem commercially reasonable.

## **Questions?**

If you ever have any questions about our Privacy Policy, please contact us. We respect your rights and privacy, and will be happy to answer any questions or concerns you might have. You may direct any such questions to [support@processCentral.co](mailto:support@processCentral.co).

Last Updated: May 23, 2018