

## PERSONAL DATA PROCESSING SCHEDULE

This is a Schedule to the Terms and Conditions of Awareness Software Ltd. This Schedule applies to the how Personal Data is processed under an Agreement, and as stipulated in a Proposal.

### 1. Interpretation

- 1.1. We own and operate the online portal <https://intranet.aware-soft.net> ("**Portal**") through which you can access functionality and information in respect of the services we provide to you from time to time ("**Services**") under our [Terms and Conditions](#).
- 1.2. For the purpose of the Data Protection Act 1998 (before 25 May 2018) and the General Data Protection Regulation or any other subsequent enactment of it in the United Kingdom (on and from 25 May 2018) (together, "**Data Protection Laws**"), we are:
  - 1.2.1. a data controller in respect of any personal data that you share with us, or that we collect, as a result of your being our customer or otherwise through the Portal (including personal data you provide to us, or that we collect, during your contracting for the Services); and
  - 1.2.2. a data processor in respect of personal data that you share with us as part of your use of the Services, and in respect of which you are the data controller; our and your respective obligations in relation to that personal data are set out in our Terms and Conditions, and additional information is set out in paragraph 4 below. For the avoidance of doubt, this is data about you personally, and this Personal Data Processing Schedule does not apply to business data that we hold from which no individual can be identified.

You can contact us by post sent to our registered address or by e-mail sent to [gdpr@aware-soft.com](mailto:gdpr@aware-soft.com).

### 2. What does this Personal Data Processing Schedule apply to?

This Personal Data Processing Schedule applies to all use of the Portal and the Services.

### 3. What does this Personal Data Processing Schedule do?

This Personal Data Processing Schedule (together with our Terms and Conditions and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read this Personal Data Processing Schedule carefully to understand our views and practices regarding your personal data and how we will treat it.

### 4. Processing under our Terms and Conditions

For the purposes of Data Protection Laws and paragraph 1.2.1 above only, we process "Personal Data " (as defined in our [Terms and Conditions](#)) in accordance with the follow scope, nature and purposes:

<b>Nature and purpose of the processing of personal data</b>	In order that we can provide our Services to you in accordance with our Terms and Conditions.
<b>Subject matter of the processing of personal data</b>	For our provision of Services to you as our customer, as set out in our Terms and Conditions .
<b>Duration of the processing of personal data</b>	The term of our contract with you in accordance with our Terms and Conditions, until we delete that data in accordance with that contract.
<b>Categories of personal data being shared between you and us</b>	Data relating to individuals provided to us by you (or at your direction) during our provision of the Services.
<b>Types of data subject in respect of whom we process personal data</b>	The data subjects in respect of whom you use our services and data is sent (or provided) to us through those Services, by you or at your direction.

For the avoidance of doubt, this paragraph 4 does not relate to our processing of your personal data in accordance with paragraph 1.2.2 above, which is dealt with in the remainder of this Personal Data Processing Schedule, and our Cookies Policy.

### 5. Fair processing

- 5.1. We will only use your personal data in the manner set out in this Personal Data Processing Schedule. We will only use your personal data in a way that is fair to you. We will only collect personal data where it is necessary for us to do so and where it is relevant to our dealings with you. We will only keep your personal data for as long as it is relevant to the purpose for which it was collected or for as long as we are required to keep it by law.
- 5.2. Other than as set out in this Personal Data Processing Schedule, we shall NOT sell or disclose your personal data to third parties without obtaining your prior consent unless this is necessary for the purposes set out in this Personal Data Processing Schedule or unless we are required to do so by law.

## 6. Collection and processing of your personal data

What personal data do we collect?	How do we collect the personal data?	Why do we use the personal data?	How long do we hold the personal data for?
Your title and name	<ul style="list-style-type: none"> <li>- By you providing information to us at the time you sign a contract with us for the Services.</li> <li>- When you get in touch with us, for example to inform us of a particular issue, to make a complaint, or to request access to additional services.</li> <li>- When you contact us in any other way for any reason.</li> <li>- In obtaining feedback from you in respect of your use of the Services.</li> </ul>	<p>We use the personal data you provide to us for the following purposes:</p> <ul style="list-style-type: none"> <li>- To provide you with billing information in relation to any Services. This is necessary for the performance of the contract we have in place with you.</li> <li>- To manage the Portal, detect fraud or Portal abuses, send you information relevant to the Services and in case we have any queries. This is in our legitimate interest.</li> </ul>	<p>For as long as we have a contract with you to provide Services.</p> <p>We will keep personal data after we stop providing Services to you, to see if you would like to start using those Services again.</p> <p>After that, we will delete your personal data, except where we need to keep it for legal, regulatory or audit reasons, in which case we may do so for six years after you cease to be our customer.</p>
			<p>In some circumstances you can ask us to delete your data: see paragraph 12 below for further information.</p>
		<ul style="list-style-type: none"> <li>- To carry out our obligations arising from any contracts entered into between you and us. This is necessary for the performance of the contract we have in place with you.</li> </ul>	
Your email address	<ul style="list-style-type: none"> <li>- By you providing information to us at the time you sign a contract with us for the Services.</li> <li>- When you get in touch with us, for example to inform us of a particular issue, to make a complaint, or to request access to additional services.</li> <li>- When you contact us in any other way for any reason.</li> <li>- In obtaining feedback from you in respect of your use of the Services.</li> </ul>	<ul style="list-style-type: none"> <li>- To notify you about changes to the Services. This is necessary for the performance of the contract we have in place with you.</li> <li>- To allow you to register for access to the Portal, which may include sending an email to you to confirm your details. This is necessary for the performance of the contract we have in place with you.</li> </ul>	<p>In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.</p>
Your contact telephone number(s)	<ul style="list-style-type: none"> <li>- By you providing information to us at the time you sign a contract with us for the Services.</li> <li>- When you get in touch with us, for example to inform us of a particular issue, to make a complaint, or to request access to additional services.</li> <li>- In obtaining feedback from you in respect of your use of the Services.</li> </ul>	<ul style="list-style-type: none"> <li>- To give you a new password if you have forgotten it. This is necessary for the performance of the contract we have in place with you.</li> <li>- To provide customer support. This is necessary for the performance of the contract we have in place with you.</li> </ul>	
Your username and password for accessing the restricted areas of the Portal	<p>By you providing information to us at the time you sign a contract with us for the Services.</p> <p>In obtaining feedback from you in respect of your use of the Services.</p>	<ul style="list-style-type: none"> <li>- To prevent or investigate prohibited activity. This is in our legitimate interest.</li> </ul>	

Your business name (if applicable)	<p>By you providing information to us at the time you sign a contract with us for the Services.</p> <p>In obtaining feedback from you in respect of your use of the Services.</p>	<ul style="list-style-type: none"> <li>- To enforce the Terms and Conditions. This is in our legitimate interest.</li> <li>- To verify information. This is in our legitimate interest.</li> <li>- To improve the Services. This is in our legitimate interest.</li> </ul> <p>We may use your name, email address and telephone number to provide you with information about products or services we feel may interest your business. It is in our legitimate interest to market products and services to you in this way. If we contact you in this way, we will tell you how you can opt-out of such communications.</p>	
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**7. Making sure the personal data we hold is accurate and up-to-date**

- 7.1. You should only submit to us information which is accurate and not misleading.
- 7.2. By submitting your or anyone else's data to us, you must ensure that you have full authority and consent to supply us with that data on their behalf and you warrant to us that you have that authority.

**8. IP addresses**

- 8.1. We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.
- 8.2. We use this data to ensure that content from the Portal is presented in the most effective manner for you and for your computer. We hold this data for two years.

**9. Cookies**

For more information about cookies and how we use them, please see our Cookies Policy.

**10. Where we store your personal data**

- 10.1. All information you provide to us is stored on our secure servers. We use industry standard security and firewalls on our servers. Where we have given you (or where you have chosen) a password which enables you to access the Portal, you are responsible for keeping that password confidential. We ask you not to share a password with anyone.
- 10.2. We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of your information. Our security procedures mean that we may occasionally request proof of identity before we disclose personal information to you.
- 10.3. Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to us; any 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.

**11. Sharing personal data with third parties**

- 11.1. We may transfer our databases containing your personal information if we sell our business or part of it to an actual or potential purchaser. This is in our legitimate interest.
- 11.2. In providing the Services, we use third parties which assist us in operating our business, and which process certain personal data on our behalf. We share personal data with those third parties only to the extent it is necessary for us to provide the Services, and where it is in our legitimate interest to do so. We have contracts with those third parties in which they are obligated to process personal data in compliance with Data Protection Laws. All third parties are based in the European Economic Area (EEA).

- 11.3. In most circumstances we will not disclose personal data without consent. However, when we receive a complaint or communication from, for example, the Information Commissioner's Office or another regulator or relevant body (such as the Police), we may need to share personal information.

## **12. Your rights under Data Protection Laws**

12.1. If you would like to:

- 12.1.1. correct or update the personal data that we hold about you
- 12.1.2. ask that we delete your personal data;
- 12.1.3. get a copy of the personal data that we hold about you;
- 12.1.4. access the personal data we hold about you;
- 12.1.5. restrict the uses for which we use your personal data;
- 12.1.6. transfer the personal data we hold about you to a third-party data controller;
- 12.1.7. object to our processing of your personal data for particular purposes; or
- 12.1.8. withdraw your consent to our use of your personal data (where relevant);

please contact us promptly by post sent to our registered address or by e-mail sent to [gdpr@aware-soft.com](mailto:gdpr@aware-soft.com). When you contact us, please include your name, email address and customer reference so that we can be sure that it is you that is contacting us and not somebody else.

- 12.2. Usually, you will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.
- 12.3. You can unsubscribe from receiving marketing communications from us by contacting us by post sent to our registered address or by e-mail sent to [gdpr@aware-soft.com](mailto:gdpr@aware-soft.com).
- 12.4. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- 12.5. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **13. Complaints**

You can make a complaint to a supervisory authority in respect of our processing of personal data at any time. In the UK, the Information Commissioner's Office (also known as the ICO) is the supervisory authority; for information on how to contact the ICO, please refer to <https://ico.org.uk/global/contact-us>. However, we would appreciate the opportunity to deal with your concerns before you contact the ICO, so please contact us in the first instance.

## **14. Changes to our Personal Data Processing Schedule**

Any changes we may make to this Personal Data Processing Schedule in the future will be notified to you by e-mail. Each time you use the Portal, you agree that the Personal Data Processing Schedule current at that time shall apply to all information held by you.

## **15. Contact**

Questions, comments and requests regarding this Personal Data Processing Schedule are welcomed and should be sent to us by post to our registered address or by e-mail sent to [gdpr@aware-soft.com](mailto:gdpr@aware-soft.com).

This Personal Data Processing Schedule was most recently updated on 13th May 2018.