



GDPR: Data Protection Policy

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Email: dpo@iebsoftware.com

IEB Software Data Protection Policy

IEB Software Limited is committed to protecting the rights and freedoms of data subjects, safely and securely processing their data in accordance with all our legal obligations.

This document summarises IEB's privacy policy and responsibilities for both parties required by the General Data Protection Regulations (GDPR) that came into effect on Friday 25 May 2018. It covers the IEB Software Limited website, and all the products and services provided by IEB Software.

Our privacy commitment:

IEB Software Limited will never sell your information to someone else for advertising or make money by showing you other people's ads. This has been our approach for almost 20 years, and we remain committed to it. This policy tells you what information we collect from you, what we do with it, who can access it, and what you can do about it.

IEB Software Limited only asks for the least amount of information necessary, gathering only what we believe is essential for doing business, or for the specific transaction at hand. We let customers know the information we have on them and allow them to opt out of specific engagements.

The goal of this policy is to make explicit the information we gather on our customers and users, how we will use it, and how we will not.

Scope of this Privacy Policy

This Privacy Policy applies to IEB Software Limited, and to the products and services provided by IEB Software Limited through our and mobile applications.

This Privacy Policy is divided into three parts:

- **Part I – Information IEB Software Limited collects and controls**
- **Part II – Information that IEB Software Limited processes on your behalf**
- **Part III – General**

Part I – Information IEB Software Limited collects and controls

We only collect information about you if we need the information for legitimate purpose. IEB Software Limited will have information about you only if (a) you have provided the information yourself, (b) IEB Software Limited has automatically collected the information, or (c) IEB Software Limited has obtained the information from a third party. Below we describe the various scenarios that fall under each of those three categories and the information collected in each one.

Information that you provide us

- *Account signup:* When you sign up for an account to access one or more of our services, we ask for information like your name, contact number, email address, company name and country to complete the account signup process. You'll also be required to choose a unique username and a password for accessing the created account. After signing up, you will have the option of choosing to reset your password at any time you wish.
- *Interactions with IEB Software Limited:* We may record, analyse and use your interactions with us, including email, telephone, and chat conversations with our sales and customer support professionals, for improving our interactions with you and other customers.

Information that we collect automatically

- *Information from browsers, devices, and servers:* When you visit our website, we collect information that web browsers, mobile devices and servers make available, such as the internet protocol address, browser type, language preference, time zone, referring URL, date and time of access, operating system, mobile device manufacturer and mobile network information. We include these in our log files to understand more about visitors to our website.
- *Information from first party cookies and tracking technologies:* We use temporary and permanent cookies to identify users of our services and to enhance user experience. We embed unique identifiers in our downloadable products to track usage of the products. We also use cookies, beacons, tags, scripts, and other similar technologies to identify visitors, track website navigation, gather demographic information about visitors and users, understand email campaign effectiveness and for targeted visitor and user engagement by tracking your activities on our website. We only use first-party cookies and do not use third-party cookies or other third-party tracking technologies on our website.
- *Information from application logs and mobile analytics:* We collect information about your use of our products, services and mobile applications from application logs and in-house usage analytics tools and use it to understand how your business use and needs can improve our products. This information includes clicks, scrolls, features accessed, access time and frequency, errors generated, performance data, storage utilised, user settings and configurations, and devices used to access and their locations.

Information that we collect from third parties

- *Information from social media sites and other publicly available sources:* When you interact or engage with us on social media sites such as LinkedIn, Facebook, or Google+, through posts, comments, questions, and other interactions, we may collect such publicly available information, including profile information, to allow us to connect with you, improve our products, or better understand user reactions and issues. We must tell you that once collected, this information may remain with us even if you delete it from the social media sites. IEB Software Limited may also add and update information about you, from other publicly available sources.

Purposes for using information

In addition to the purposes mentioned above, we may use your information for the following purposes:

- To communicate with you (such as through email, landline, or mobile phone) about products that you have downloaded and services that you have signed up for, changes to this Privacy Policy, changes to the Terms of Service, or important notices.
- To keep you posted on new products and services, promotions, and other information that we think will be of interest to you

- To request feedback on our products and services
- To set up and maintain your account, and to do all other things required for providing our services, such as enabling collaboration, providing website and mail hosting, and backing up and restoring your data
- To understand how users, use our products and services, to monitor and prevent problems, and to improve our products and services
- To provide customer support, and to analyse and improve our interactions with customers
- To detect and prevent fraudulent transactions and other illegal activities, to report spam, and to protect the rights and interests of IEB Software Limited, IEB Software Limited's users, third parties and the public
- To update, expand and analyse our records, identify new customers, and provide products and services that may be of interest to you
- To analyse trends, administer our website, and track visitor navigations on our website to understand what visitors are looking for and to better help them
- To monitor and improve marketing campaigns and make suggestions relevant to the user.

Legal Basis for collecting and using information

Legal processing basis applicable to IEB Software Limited: If you are an individual from the European Economic Area (EEA), our legal basis for information collection and use depends on the personal information concerned and the context in which we collect it. Most of our information collection and processing activities are typically based on (i) contractual necessity, (ii) one or more legitimate interests of IEB Software Limited, or (iii) your consent. Sometimes, we may be legally required to collect your information, or may need your personal information to protect your vital interests or those of another person.

Withdrawal of consent: Where we rely on your consent as the legal basis, you have the right to withdraw your consent at any time, but this will not affect any processing that has already taken place.

Legitimate interests notice: Where we rely on legitimate interests as the legal basis and those legitimate interests are not specified above, we will clearly explain to you what those legitimate interests are at the time that we collect your information.

Your choice in information use

Opt out of non-essential electronic communications: You may opt out of receiving newsletters and other non-essential messages by using the 'unsubscribe' function included in all such messages. However, you will continue to receive notices and essential transactional emails.

Disable cookies: You can disable browser cookies before visiting our website. However, if you do so, you may not be able to use certain features of the website properly.

Optional information: You can choose not to provide optional profile information such as your photo. You can also delete or change your optional profile information. You can always choose not to fill in non-mandatory fields when you submit any form linked to our website.

Who we share your information with

IEB Software Limited does not share any of your information with any third party.

Employees: Employees of IEB Software Limited have access to the information covered in Part I on a need-to-know basis. We require all employees of IEB Software Limited to follow this Privacy Policy for personal information that we share with them.

Domain registrars: When you register a domain through IEB Software Limited from domain name registrars, we share your name and contact information such as your physical address, email address and phone number with them as per the ICANN domain registration rules.

Other cases: Other scenarios in which we may share the same information covered under Parts I and II are described in Part III.

Your rights with respect to information we hold about you as a controller: If you are in the European Economic Area (EEA), you have the following rights with respect to information that IEB Software Limited holds about you. IEB Software Limited undertakes to provide you the same rights no matter where you choose to live.

Right to access: You have the right to access (and obtain a copy of, if required) the categories of personal information that we hold about you, including the information's source, purpose and period of processing, and the persons to whom the information is shared

Right to rectification: You have the right to update the information we hold about you or to rectify any inaccuracies. Based on the purpose for which we use your information, you can instruct us to add supplemental information about you in our database.

Right to erasure: You have the right to request that we delete your personal information in certain circumstances, such as when it is no longer necessary for the purpose for which it was originally collected.

Right to restriction of processing: You may also have the right to request to restrict the use of your information in certain circumstances, such as when you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

Right to data portability: You have the right to transfer your information to a third party in a structured, commonly used, and machine-readable format, in circumstances where the information is processed with your consent or by automated means.

Right to object: You have the right to object to the use of your information in certain circumstances, such as the use of your personal information for direct marketing.

Right to complain: You have the right to complain to the appropriate supervisory authority if you have any grievance against the way we collect, use, or share your information. This right may not be available to you if there is no supervisory authority dealing with data protection in your country.

Retention of information: We retain your personal email information for as long as it is required for the purpose of using IEB Software platforms. This is also the length of time the agreement between IEB Software, and the Client is in existence.

Part II – Information that IEB Software Limited processes on your behalf.

Information entrusted to IEB Software Limited and purpose

Information provided in connection with services: You may entrust information that you or your organisation (“you”) control, to IEB Software Limited in connection with use of our services or for requesting technical support for our products. This includes information regarding your employees (if you are a controller) or data that you hold and use on behalf of another person for a specific purpose, such as an employee to whom you provide services (if you are a processor). The data may either be stored on the application servers when you use our services or transferred or shared to us as part of a request for technical support or other services.

Information from mobile devices: When you elect to allow it, some of our mobile applications have access to the camera, GPS Location, and time stamp information, and other information which is stored on your mobile device. Our applications require such access to provide their services. Similarly, when you elect to provide access, location-based information is also collected for purposes including, but not limited to, locating nearby assets or setting asset location-based reminders. This information will be exclusively shared with our mapping providers and will be used only for mapping user locations. You may disable the mobile applications' access to this information at any time by editing the settings on your mobile device. The data stored on your mobile device and their location information to which the mobile applications have access will be used in the context of the mobile application and transferred to and associated with your account in the corresponding services (in which case the data will be stored on our servers) or products (in which case the data will remain with you unless you share it with us). (All the information entrusted to IEB Software Limited is collectively termed “service data”).

Ownership and control of your service data: We recognise that you own your service data. We provide you complete control of your service data by providing you the ability to (i) access your service data, (ii) share your service data, and (iii) request export or deletion of your service data.

How we use service data: We process your service data when you provide us instructions through the various modules of our software platforms. For example, when you generate a corrective maintenance task, information such as the name and email address of your employee or third-party contractor will be used to generate the necessary Job creation notifications and displays.

Push notifications: If you have enabled notification on our desktop and mobile applications, we will push notifications through a push notification provider. You can manage your push notification preferences or deactivate these notifications by turning off notifications in the application or device settings.

Who we share service data with: IEB Software Limited do not share service data with any other entity person or organisation.

Other scenarios in which we may share information that are common to information covered under Parts I and II are described in Part III.

Retention of information: We hold the data in your account as long as you choose to use IEB Software Limited Services. Once you terminate your IEB Software Limited user account, your data will eventually get deleted from active database during the next clean-up that occurs once in 6 months.

Data subject requests: If you are from the European Economic Area and you believe that we store, use or process your information on behalf of one of our customers, please contact the customer if you would like to access, rectify, erase, restrict or object to processing, or export your personal data. We will extend our support to our customer in responding to your request within a reasonable timeframe.

Part III – General

Children's personal information: Our products and services are not directed to individuals under 16. IEB Software Limited does not knowingly collect personal information from children who are under 16 years of age. If we become aware that a child under 16 has provided us with personal information, we will take steps to delete such information. If you believe that a child under 16 years has provided personal information to us, please write to dpo@iebsoftware.com with the details, and we will take the necessary steps to delete the information we hold about that child.

How secure is your information: At IEB Software Limited, we take data security very seriously. We have taken steps to implement appropriate administrative, technical & physical safeguards to prevent unauthorised access, use, modification, disclosure, or destruction of the information you entrust to us. If you have any concerns regarding the security of your data, we encourage you to check our Security Policy or write to us at dpo@iebsoftware.com with any questions.

Data Protection Officer: We have appointed a Data Protection Officer to oversee our management of your personal information in accordance with this Privacy Policy. If you have any questions or concerns about our privacy practices with respect to your personal information, you can reach out to our Data Protection Officer by sending an email to dpo@iebsoftware.com or by writing to: Data Protection Officer, IEB Software Limited, Gortfoyle Business Centre, 104-108 Spencer Road, Derry ~ Londonderry, BT476AG

Locations and international transfers: We share your personal information and service data within the IEB Software Limited Group. By accessing or using our products and services or otherwise providing personal information or service data to us, you consent to the processing, transfer, and storage of your personal information or Service Data within the United States of America, the European Economic Area (EEA) and other countries where IEB Software Limited operates. Such transfer is subject to a group company agreement that is based on EU Commission's Model Contractual Clauses.

Data processing addendum: To enable you to be compliant with the data protection obligations under the General Data Protection Regulation, we are prepared to sign a Data Processing Addendum (DPA) that is based on Standard Contractual Clauses. You can request a DPA from IEB Software Limited by sending an email request to dpo@iebsoftware.com we will then forward the DPA to you for your signature.

Do Not Track (DNT) requests: Some internet browsers have enabled 'Do Not Track' (DNT) features, which send out a signal (called the DNT signal) to the website that you visit indicating that you don't wish to be tracked. Currently, there is no standard that governs what website can or should do when they receive these signals. For now, we do not act in response to these signals.

Disclosures in compliance with legal obligations: We may be required by law to preserve or disclose your personal information and service data to comply with any applicable law, regulation, legal process, or governmental request, including to meet national security requirements.

Enforcement of our rights: We may disclose personal information and service data to a third party if we believe that such disclosure is necessary for preventing fraud, investigating any suspected illegal activity, enforcing our agreements or policies, or protecting the safety of our users.

Business Transfers: We do not intend to sell our business. However, in the unlikely event that we sell our business or get acquired or merged, we will ensure that the acquiring entity is legally bound to honour our commitments to you. We will notify you via email or through a prominent notice on our website of any change in ownership or in the uses of your personal information and service data. We will also notify you about any choices you may have regarding your personal information and service data.

Compliance with this Privacy Policy: We make every effort, including periodic reviews, to ensure that personal information you provide is used in conformity with this Privacy Policy. If you have any concerns about our adherence to this Privacy Policy or the manner in which your personal information is used, kindly write to us at dpo@iebsoftware.com We'll contact you, and if required, coordinate with the appropriate regulatory authorities to effectively address your concerns.

Notification of changes: We may modify the Privacy Policy at any time, upon notifying you through a service announcement or by sending an email to your primary email address. If we make significant changes to the Privacy Policy that affect your rights, you will be provided with at least 30 days' advance notice of the changes by email to your primary email address. If you think that the updated Privacy Policy affects your rights with respect to your use of our products or services, you may terminate your use by sending us an email within 30 days. Your continued use after the effective date of changes to the Privacy Policy will be deemed to be your agreement to the modified Privacy Policy. You will not receive email notification of minor changes to the Privacy Policy. If you are concerned about how your personal information is used, you should check back at www.iebsoftware.com periodically.