



# Privacy Notice

Updated 19/08/2020

# Privacy Notice

## 1 What this Privacy Notice covers

The purpose of this Privacy Notice is to explain how two10degrees Ltd., a registered business in England and Wales 3844968 at Unit 1 Brabazon Business Park, Golf Course Lane, Filton, BS34 7PZ, United Kingdom, and two10degrees Pty Ltd. a registered business in Australia 35008576645 at 27-31 London Road, Mile End South, SA, 5031, Australia, ("two10degrees", "we", "us", or "our"), secures, shares, and uses personal information that it collects and receives from you through its website ([www.two10degrees.com](http://www.two10degrees.com)), website hosting and Software as a Service products, communication tools, mobile applications and other services (collectively, the "Service"). If you have any questions or concerns regarding this Privacy Notice or our practices, please see the "Contact Us" section below.

### 1.1 For users outside the European Union

For users located outside of the European Union, by submitting any personal information through our website or otherwise through our Service, you agree to the terms of this Privacy Notice and you expressly consent to the collection, use, and disclosure of your personal information in accordance with this Privacy Notice.

### 1.2 For all users

We may use information shared with us for any legal purpose, including to run and improve our service and for marketing purposes, but in each case solely in accordance with applicable law, the scope of your consent to use such information (if applicable) and, where two10degrees acts as a data processor for a data controller, solely on the basis of instructions from such data controller. For example, with respect to some parts of our Service, such as our Global Alerting Platform, our Partner (service provider) is the data controller and two10degrees is a data processor. As a data processor, two10degrees does not have a direct relationship with the person whose personal information we collect and process at the direction of the service provider (i.e. the data controller). If you are a customer of one of these service providers and no longer want to be contacted by them or want to access and change the personal information we collect and process as a data processor, please contact the service provider you interacted with directly.

## 2 What personal information does two10degrees collect?

Two10degrees may collect personal information as further described below through:

- Personal information provided by you
- Automatically collected Information
- Billing information



- Cookies and other tracking technologies
- Third-party analytics data
- Mobile app-based data
- We do not collect or use “sensitive consumer information” and do not offer or sell to any third party any data based on sensitive consumer information.

### 3 How does two10degrees use your personal information?

As further described below, two10degrees may use the information it collects from you for any lawful purpose, including, without limitation, for providing products and services, identification and authentication, Service operation, analytics and improvements, support, contact (e.g., sending notifications related to use of the Service), marketing and promotions, research, and anonymous reporting. We may combine automatically collected information with other information we collect about you, in each case that does not directly identify you as a person (but as explained above, may still identify your device or indirectly identify you), to improve site functionality and the services we offer you, and for Service and both internal and external marketing analytics.

In particular, we engage in the following practices with respect to the information and uses described below:

#### 3.1 To provide a requested service or carry out a contract with you

##### 3.1.1 Personal information you provide to us

We use this personal information in order to provide you with our Service, to respond to billing inquiries, and keep you updated with news about two10degrees, the Service, and our partners.

##### 3.1.2 User Site Membership/Registration

When you register, or are invited to register, as a member of a website, or subscribe to a Service operated by us or one of our partners, we store and use your information solely to provide administrative functions in support of the Service.

#### 3.2 Where we have your consent

##### 3.2.1 Marketing Communications

You will receive marketing communications from us or any of our partners where you have given your consent to this or it is otherwise lawful for us to do so. You can choose not to receive any of these marketing communications by following the unsubscribe instructions included in these emails (where applicable). You may also notify us by contacting us, please see the details in the contact us section below.

##### 3.2.2 Testimonials

We display personal testimonials of satisfied customers on our site in addition to other endorsements. Where you agree to this, we may post your testimonial along with your

name. If you wish to update or delete your testimonial, you can contact us at [info@two10degrees.com](mailto:info@two10degrees.com).

### 3.2.3 Phone Calls and Messages

For users outside the EU: By providing us your phone number, you are consenting to us or our partners contacting you via autodialed or pre-recorded calls/messages.

For all users: two10degrees or our partners, may contact you using any telephone number you have provided us for:

- Account notifications
- Account troubleshooting
- Dispute resolution;
- Debt collection
- As necessary to service your account or enforce our Terms of Service and policies, applicable law, or any other agreement we may have with you.

We may collect other telephone numbers for you and may place manual, non-marketing calls to any of those numbers.

If you do not wish to receive such communications, you may update this yourself (application and permission allowing), through your service provider or by contacting two10degrees on [info@two10degrees.com](mailto:info@two10degrees.com).

## 3.3 Where we have a legitimate interest

### 3.3.1 IP addresses, browser and session information

IP addresses, browser and session information may be used to:

- Diagnose and prevent service or technology problems reported by our users or engineers that are associated with the IP addresses controlled by a specific web company or ISP.
- Estimate the total number of users from specific geographical regions using the Service.
- Help determine which users have access privileges to certain content, services, or resources that we offer.
- Monitor and prevent fraud and abuse.

### 3.3.2 Automatically collected user information

We use this personal information to analyse trends in the aggregate and administer the Service.

### 3.3.3 Cross-App and Cross-Device Information

We, our customers, and/or our third-party partners use this in order to deliver advertising that may be more relevant to you, as well as for analytics and reporting purposes.

### 3.4 Third Parties

Our Service includes links to other websites whose privacy practices may differ from ours. If you submit personal information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit.

## 4 Who does two10degrees share your personal information with?

Two10degrees does not share personal information we learn about you from your use of the Service with others except as described in this Privacy Notice and in connection with: (i) the completion of transactions; (ii) research, promotions and contests; (iii) third party marketing; (iv) a merger or sale; (v) publicly accessible information; (vi) domain registrations; and (vii) other lawful disclosures.

### 4.1 Completion of Transactions

Two10degrees may share your personal information on a secured basis where it is necessary to complete a transaction; to operate, improve, or communicate to you about the Service; to detect fraud or compliance with export regulations; or to do something that you have asked us to do. We use other third parties such as payment processors to bill you for goods and services. These third parties are authorized to use your personal information only as necessary to provide these services to us and are prohibited from using your personal information for promotional purposes.

### 4.2 Research, Promotions and Contests

From time to time, two10degrees or a partner may sponsor a research panel, promotion or contest. You may be asked to provide personal information including name, email address, or home address, or to answer questions to participate. This information will be used strictly for purposes of the research panel, promotion or contest administration and fulfilment, as well as for internal business purposes.

### 4.3 Third Party Marketing

Two10degrees may share anonymised and/or aggregated information with third parties for their marketing, advertising, promotion, or other uses. In addition, from time to time we may share your personal information with third parties who want to promote goods and/or services that we think would be of interest to you. If you are located in the EU, we will only share your personal information for any marketing purposes where you have consented to this after being provided with information on the concerned third parties or where it is otherwise lawful to do so. If you want us to stop sharing your contact information with third parties, you may notify us using the details in the contact us section below.

#### 4.4 In the Event of Merger or Sale

As we continue to develop our business, we may also buy or sell all or part of our business. In such transactions, personal information you have shared with us is generally one of the business assets that will be transferred. The transferred personal information will remain subject to the promises made in this privacy notice or subsequent notices to which you have consented. If two10degrees is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our site of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

#### 4.5 Publicly Accessible Information

If you post personal information online that is accessible to the public or other users, you may receive unsolicited messages from other parties in return. Any information you provide in these areas may be read, collected, and used by others who access them. To have your personal information removed from such services, submit a request to [info@two10degrees.com](mailto:info@two10degrees.com). In some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why.

#### 4.6 Lawful disclosure

Two10degrees may disclose personal information about you under the following circumstances:

- In response to lawful requests by public authorities, including but not limited to national security or law enforcement requests. We may also disclose your personal information as required by law, such as to respond to subpoenas, court orders, or similar legal processes, to establish or exercise our legal rights or, defend against legal claims, or if in our judgment in such circumstances disclosure is required or appropriate.
- If we believe it is necessary in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our various terms of use, or as otherwise required by law.

### 5 How long does two10degrees retain your personal information?

As further described below, we will retain your information for as long as your account is active or as needed to provide you the Service, but in no event longer than permitted by applicable law.

When determining the relevant retention periods, we will take into account factors including:

- our contractual obligations and rights in relation to the personal information involved;
- legal obligation(s) under applicable law to retain data for a certain period of time
- statute of limitations under applicable law(s)
- (potential) disputes, and
- guidelines issued by relevant data protection authorities.

Otherwise, we securely erase your information once this is no longer needed.

## 6 Does two10degrees Transfer Your Personal Information Outside the Country?

Where required, we may transfer your personal information to servers located outside the country in which you live. Laws of other countries on personal information can sometimes be different from those in your country of residence. We will only transfer data where it is lawful to do so. Where your personal information is transferred outside its country of origin, we ensure security measures and appropriate safeguards are put in place to protect your personal information and ensure that all transfers of your personal information comply with applicable data protection law and are carried out in accordance with two10degrees's instructions.

## 7 How Does two10degrees Keep Your Personal Information Safe?

We take reasonable steps to put in place appropriate physical, electronic, and procedural safeguards to protect the integrity and security of personal information about you and to prevent unauthorised or unlawful processing of personal information and the accidental loss, destruction, or damage to personal information. These measures include internal reviews of our data collection, storage and processing practices and security measures (Strong password protection and in certain areas industry standard SSL-encryption to protect data transmissions), as well as physical security measures to guard against unauthorised access to systems where we store data.

However, data transmissions over the Internet and methods of electronic storage are not 100% secure. Consequently, we cannot guarantee or warrant the security of any information you transmit to us and you do so at your own risk.

If two10degrees learns of a security system breach, we may attempt to notify you electronically so that you can take appropriate protective steps. We may post a notice on our applicable websites if a security breach occurs. If this happens, you will need a web browser enabling you to view the applicable web sites. In these circumstances, we may also send an email to you at the email address you have provided to us.

## 8 What are your Privacy Rights?

### 8.1 Two10degrees as Data Controller

Upon request, we will provide you with information about whether we hold or process your personal information on behalf of third parties. You can access and edit your account information with Global Alerting Platform at any time by logging into your account. You can also contact us at [support@two10degrees.com](mailto:support@two10degrees.com), and we will respond as soon as possible.

You can delete your applicable account by selecting the deactivation button on the application. However, some personal information, primarily your contact information, may remain in our records to the extent necessary to protect our legal interests or document compliance with regulatory requirements, in each case solely to the extent permitted by applicable law.

If your personal information changes, or if you no longer wish to use our Service, you may correct, update, or delete such information by making the change on your user account page, or by submitting a request through your service provider.

### 8.2 Two10degrees as Data Processor

Two10degrees acknowledges you have the right to access and change the personal information we collect and process as a data processor. An individual who seeks to access or to correct, amend, or delete personal information should direct their request to the service provider who is the data controller, and not to two10degrees directly. If the data controller requests two10degrees to remove personal information we will respond within a reasonable timeframe.

### 8.3 Users in the European Union only

Under EU Regulation 2016/679 of the European Parliament and the Council; the General Data Protection Regulation ("GDPR"), you have a number of rights when it comes to your personal information. Further information and advice about your rights can be obtained from the data protection regulator in your country of residence within the EU. You can exercise any of these rights by contacting us at [info@two10degrees.com](mailto:info@two10degrees.com).

#### 8.3.1 The right to be informed

You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. Therefore, we're providing you with the information in this Policy.

#### 8.3.2 The right of access

You have the right to obtain access to your information (if we're processing it), and certain other information (similar to that provided in this Privacy Policy). This is so you're aware and can check that we're using your information in accordance with data protection law. You can do this by contacting us using the details below.

### 8.3.3 The right to rectification

You are entitled to have your information corrected if it is inaccurate or incomplete. You can request that we rectify any errors in personal information that we hold by contacting us using the contact details below.

### 8.3.4 The right to erasure

This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there is no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions e.g. we have a lawful reason.

### 8.3.5 The right to restrict processing

You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future.

### 8.3.6 The right to data portability

You have rights to obtain and reuse your personal data for your own purposes across different services. For example, if you decide to switch to a new provider, this enables you to move, copy or transfer your information easily between our IT systems and theirs safely and securely, without affecting its usability. This is not a general right however and there are exceptions.

### 8.3.7 The right to object to processing

You have the right to object to certain types of processing, including processing for direct marketing (i.e. receiving emails from us notifying you about other services we provide which we think may be of interest to you or being contacted with varying potential opportunities). You may change your preferences regarding email communications by contacting [marketing@two10degrees.com](mailto:marketing@two10degrees.com) or using the unsubscribe links in the emails.

### 8.3.8 The right to withdraw consent

If you have given your consent to anything we do with your personal data (i.e. we rely on consent as a legal basis for processing your personal information), you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). You can withdraw your consent to the processing of your personal information at any time.

## 9 Third-Party Features, Services, Links and Apps

Our Service includes various third-party features, services, and apps. These third-party features, services, and apps may collect your personal information to function properly. Third party features, services, and apps are either hosted by a third party or hosted directly on our Service. Your interactions with these third-party features, services, and

apps may be governed by the privacy policy of the company providing the third-party features, services, and apps, and you are responsible for viewing that company's relevant privacy policy.

Third party features, services, and apps may also support functions that require that you disclose certain personal and sensitive information given your choice of participation.

Our Service includes links to other websites whose privacy practices may differ from ours. If you submit personal information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit.

## 10 Changes to this privacy notice

This privacy notice may change from time to time in line with legislation or industry developments. We will not explicitly inform our clients or website users of these changes.

## 11 Contact Us

If you have a privacy concern regarding two10degrees, or this notice, and if you cannot satisfactorily resolve it through the Service, please contact us.

By email: [privacy.officer@two10degrees.com](mailto:privacy.officer@two10degrees.com)

By post:

Nova Group (two10degrees)  
Unit 1 Brabazon Business Park  
Golf Course Lane  
Filton  
BS34 7PZ  
United Kingdom

By telephone: +44(0)1473 834560

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