



*This Privacy Notice applies to Disperse's processing of personal data from 25 May 2018*  
Version: 2.1

## DISPERSE.IO LTD

### PRIVACY NOTICE

1. Who is responsible for processing your data
2. Categories and sources of personal data and purposes and lawful basis for processing.
3. Sharing of your information
4. Retention Period
5. California Residents
6. Your Rights
7. Changes to this Privacy Notice

#### 1. WHO IS RESPONSIBLE FOR PROCESSING YOUR DATA AND HOW TO CONTACT US

This notice ("Notice") describes the steps Disperse.io ("Disperse", "Company", "we", "our", or "us") take to protect the personal data that we process about our customers, individuals related or adverse to our customers and other business contacts. In this capacity, Disperse acts as a data controller. Disperse's contact address is at 580 5th Avenue Suite 820, New York NY 10036

In this capacity, Disperse is the entity responsible for the collection and processing of your personal information and acts as a data controller. A data controller is an entity that determines the means and purposes of the processing of personal information.

Disperse takes its data processing obligations and our legal, professional and ethical duties and obligations to protect personal data seriously. We have a robust information security management program in place to protect the personal data and other information that we process. These measures are monitored, reviewed and regularly enhanced in order to meet our professional responsibilities and the needs of our customers.

The core business of Disperse is construction technology and does not involve large-scale processing of personal data.

#### 2. WHAT PERSONAL DATA WE COLLECT AND WHY

We may source, use and otherwise process your personal data in different ways. In all cases we are committed to protecting the personal data that we process.

In each of the sections listed below, we describe how we obtain your personal data and how we will treat it.

Section 2.1 Representatives of our Existing or Prospective Customers, Distributors and Vendors  
Section 2.2 Personal Data related to the Services that we offer  
Section 2.3 Visitors to our Premises  
Section 2.4 Website Visitors

##### 2.1 Representatives of our Existing or Prospective Customers and Vendors

###### A - Sources of personal data

We may obtain your personal data from the following sources:

- (a) from you directly;

- (b) from a company that employs you, if you are an employee of our customer and/or contractor;
- (c) from visitors to our offices;
- (d) from partners with whom we have a relationship;
- (e) during networking events that we have either hosted, or sponsored, or attended; and/or
- (f) from publicly available sources (for example, your company website or social media sites).

## B - Personal data that we collect and process

We may collect the following categories of personal data relating to our corporate customers' employees, officers, authorised signatories, and other associated individuals. This may include:

- (a) name;
- (b) name of employer;
- (c) business address;
- (d) business email address;
- (e) business telephone number;
- (f) IP address;
- (g) website user activity; and
- (h) job title.

## C - Why do we collect your personal data and what are our lawful bases for it?

| Representatives of our Existing or Prospective Customers, Distributors and Vendors |  |   |
|--|--|---|
| <i>We may use your personal data to:</i>   | <i>Our lawful basis for doing so is:</i> | <i>Our legitimate interests in doing so are:</i>  |
| Provide you with our services  | Legitimate Interest                      | Efficiently fulfil our contractual and legal obligations<br>Management reporting (including at an intra-group level)  |
| Establish and manage our relationship  |  | Efficiently fulfil our contractual and legal obligations<br><br>Account management  |
| Learn about how our products are or may be used                                    |  | Exercise or defend legal claims<br><br>Understand the market in which we operate<br>Management reporting<br>Provide technical support<br>Account management |
| Manage security  |  | Managing security, risk and crime prevention.   |

|  |  |   |
|--|--|---|
|  |  | including anti-money laundering   |
|  |  | Management reporting  |
| Let you know about our products and events that may be of interest to you by letter, telephone, email or other forms of electronic communication |  | Promote our products and services<br>Management reporting (including at an intra-group level) |

If you object to us using your contact details for these purposes, including direct marketing, please send an email to us using the following email address: [support@disperse.io](mailto:support@disperse.io).

Where we use your email to communicate marketing information to you, we may need to obtain your prior consent to send such communications where required to do so by law.

## 2.2 Personal Data Related to the Services that we Offer

### A - Sources of personal data

Your personal data may be processed when our customers use our services. Disperse processes images on construction sites that may capture images of individuals. The images are used for the provision and maintenance of our software and also to develop and improve our products and services, but the images of individuals are not used to provide the service.

### B - Personal data that we collect and process

We may collect the following categories of personal data relating to our corporate customers' end-users:

- name;
- email address;
- IP address;
- user activity;
- camera footage and environment scans;
- login credentials (username, password etc.).

## C - Why do we collect your personal data and what are our lawful bases for it?

| Data relating to you flowing through the products and services we provide our corporate customers |  |  |
|---|--|--|
| <i>We may use your personal data to:</i>  | <i>Our lawful basis for doing so is:</i> | <i>Our legitimate interests in doing so are:</i>   |
| Provide our customers with our services   | Legitimate Interest                      | Efficiently fulfil our contractual and legal obligations<br>Management reporting   |
| Establish and manage our relationship   |  | Efficiently fulfil our contractual and legal obligations<br>Account Management<br>Exercise or defend legal claims<br>Understand the market in which we operate<br>Management reporting |
| Learn about how our products and services are or may be used                                      |  | Understand the market in which we operate<br>Management reporting<br>Account Management  |
| Demonstration to prospective customers  | Legitimate Interest                      | Promote and market our products to prospective customers   |

## 2.3 Visitors to Our Premises

### A - Sources of personal data

We may obtain your personal data from you directly and/or from our systems' records.

### B - Personal data that we collect and process

- a) name;
- b) business contact details;
- c) organisation;
- d) role; and/or
- e) image (for example, from cameras).

### C - Why do we collect your personal data and what are our lawful bases for it?

| Visitors to our Premises                     |  |  |
|--|--|--|
| <i>We may use your personal data to:</i>     | <i>Our lawful basis for doing so is:</i> | <i>Our legitimate interests in doing so are:</i> |
| Manage security                              | Legitimate Interest                      | Managing security, risk and crime prevention     |
| Maintain records of visitors to our premises |  | Management reporting                             |

If you object to us using your personal data for these purposes, please send an email to us using the following email address: [support@disperse.io](mailto:support@disperse.io).

### 2.4 Website Visitors

#### A - Sources of personal data

We may obtain your personal data from the following sources:

- a) from you directly (for example, by filling in forms on the website.
- b) when you register to use the website or for a trial period;
- c) subscribe to any of our services;
- d) request further information via the website
- e) when you report a problem with the website;
- f) from your device or browser; and/or
- g) if you contact us, we may keep a record of that correspondence.

#### B - Personal data that we collect and process

- a) name;
- b) username;
- c) email address;
- d) phone number;
- e) postal address;
- f) operating system;
- g) browser type;
- i) other website data, including page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page;
- j) cookie data (for more information please see our Cookie Notice)
- k) preferences regarding online marketing; and/or
- l) IP address.

## C - Why do we collect your personal data and what are our lawful bases for it?

| Website Visitors   |  |  |
|--|--|--|
| <i>We may use your personal data to:</i>   | <i>Our lawful basis for doing so is:</i> | <i>Our legitimate interests in doing so are:</i>   |
| Provide our website services to you, your employer or our clients  | Legitimate Interest                      | Website management<br><br>Promote our products and services<br><br>Account management<br><br>Notifying you of any changes to our products          |
| Establish and manage our relationship  |  | Understand the market in which we operate  |
|  |  | Management reporting<br><br>Account management<br><br>Make suggestions and recommendations to you about products or services that may interest you |
| Learn about our website(s) users' browsing patterns and the performance of our website(s)  |  | Website management, including troubleshooting, data analysis, testing, research, statistical and survey purposes                                   |
| Manage security  |  | Managing security, risk and crime prevention<br>Management reporting on security incidents   |
| Let you know about our products, services and events that may be of interest to you by letter, telephone, email or other forms of electronic communication |  | Promote our products and services<br><br>Management reporting  |
| Learn about how our products or services may be used   |  | Understand the market in which we operate<br><br>Management reporting  |





If you object to us using your personal data for these purposes, including direct marketing, please send an email to us using the following email address: [support@disperse.io](mailto:support@disperse.io).

We will seek your prior consent, where required to do so by law, where we:

- a) use cookies or similar technologies to fulfil this purpose; and/or
- b) use your email to communicate marketing information to you.

### 3. WHO DO WE SHARE YOUR PERSONAL DATA WITH

We do not sell your personal data to third parties. We will never sell personal data collected for purposes outside of marketing, or otherwise obtained from third parties, nor knowingly permit it to be used for marketing purposes by any person outside Disperse.

#### Intra-group Transfers to our Affiliates

We may share your personal data with our affiliates and subsidiaries, as set out In Annex 1 International transfers within the Company are governed by intra-group controller arrangements and processor agreements, as appropriate. C

#### Our Service Providers

We may disclose information about you to organisations that provide a service to us, on the understanding that they will keep the information confidential and will comply with the relevant data protection laws. We may share your information with the following types of service providers:

- a) our distributors who may contact you regarding Disperse products and services, if you indicated your desire to receive such offers;
- b) technical support providers who assist with our website and IT infrastructure;
- c) third party software providers, including 'software as a service' solution providers, where the provider hosts the relevant personal data on our behalf;
- d) professional advisers such as solicitors, accountants, tax advisors, auditors and insurance brokers.
- e) our advertising and promotional agencies and consultants and those organisations selected by us to carry out marketing campaigns on our behalf;
- f) and/or providers that help us store, collate and organise information effectively and securely, both electronically and in hard copy format (e.g. cloud service providers), and for marketing purposes.

#### Company Mergers and Takeovers

We may transfer your personal data to potential purchasers and their advisors, subject to appropriate confidentiality obligations, in the event we decide to dispose of all or parts of our business. Any personal data that may be transferred to a potential merger partner will be limited to that which is necessary for the transaction to proceed and will be safeguarded by protective contractual measures.

#### Legal and Regulatory Enforcement

If you have breached the terms of an agreement between us and you, abused your rights to use the website, or violated any applicable law. Your information may be shared with competent authorities and with any third party, if we believe it is necessary or justified.



#### 4. RETENTION PERIOD

We will keep and process your personal data only for as long as is necessary for the purposes for which it was collected in connection with your relationship with us, unless we have a legal right or obligation to retain the data for a longer period, or the data is necessary for the establishment, exercise or defense of legal claims or our legitimate interests.

Users and their contact data are removed within a business day from all databases, except server logs.

#### 5. CALIFORNIA RESIDENTS

Notwithstanding anything to the contrary in this Notice, the following provisions apply with respect to California residents from whom we collect personal information:

**Do We Respond to Do Not Track Signals?** Our websites currently do not have the ability to respond to "Do Not Track" signals or other mechanisms that give you the ability to choose whether personally identifiable information about your online activity (on our websites and other third party online services) is tracked over time.

Please see Disperse Cookie Notice for details of third parties that may track your online activity over time.

#### 6. YOUR RIGHTS

We comply by UK GDPR and if your protection laws provide you with certain rights in relation to the processing of your personal data, you may request to:

- Request access to personal data about you (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you, and to check that we are lawfully processing it.
- Request rectification, correction, or updating to any of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request personal data provided by you to be transferred in machine-readable format ("data portability"). This enables you to port personal data that you provided to us to another supplier.
- Request erasure of personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove personal data where you have exercised your right to object to processing (see below).
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you (e.g. if you want us to establish its accuracy or the reason for processing it).
- Object to the processing of your personal data in certain circumstances. This right may apply where:
  - the processing of your personal data is based on the legitimate interests of Company, as explained above,
  - decisions about you are based solely on automated processing, including profiling, or
  - your personal data is being processed for direct marketing purposes. These rights are not absolute and are subject to various conditions under:
- applicable data protection and privacy legislation; and
- the laws and regulations to which we are subject.

Where consent is the basis for processing personal data, you may decline to give your consent, or to withdraw consent to the processing at any time.





These rights are not absolute and are subject to various conditions under applicable data protection and privacy legislation and the laws and regulations to which we are subject in our business activities.

In some cases, the exercise of these rights (for example, erasure, objection, restriction or the withholding or withdrawing of consent to processing) may make it impossible for us to achieve the purposes identified in Section 2 of this Notice.

If at any time you decide that you do not want to be contacted for any purpose or if you would like to exercise any of your rights as set out above, you can contact us by emailing the following email address: [support@disperse.io](mailto:support@disperse.io).

Data subjects also have the right to submit a complaint concerning our processing of their personal data to the appropriate supervisory authority.

## 6. CHANGES TO THIS PRIVACY NOTICE

We may change this Privacy Notice at any time by posting the revised Privacy notice on this website and indicating the effective date of the revised Privacy Notice. This version was last updated on 14/06/2024.

## ANNEX 1: DISPERSE ENTITIES

| Disperse Entity  | Country              |
|--|----------------------|
| Disperse.io LTD  | United Kingdom       |
| Disperse GmbH  | Germany              |
| Disperse.io d.o.o.   | Bosnia & Herzegovina |
| Disperse Inc   | United States        |
| Disperse Pakistan (Private) Limited  | Pakistan             |
| Nethar Alalfyah ( <i>Millennium Disperse</i> )<br>Information Technology Company | Saudi Arabia         |