



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

DISPERSE.IO LTD PRIVACY NOTICE

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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") takes to protect the personal data that we process about our customers, individuals related or adverse to our customers, and other business contacts.

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 processing personal information.

Contact address:

Disperse.io Ltd
580 5th Avenue, Suite 820
New York, NY 10036

We take our data processing obligations — along with our legal, professional, and ethical duties — seriously. We have a robust information security management program in place to protect personal data and other information we process. These measures are **monitored, reviewed, and regularly enhanced** to meet both 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.



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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 the sections 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, Distributors, and Vendors

A – Sources of Personal Data

We may obtain your personal data from the following sources:

- a) Directly from you
- 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 hosted, sponsored, or attended
- f) From publicly available sources (e.g., your company website or social media profiles)

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:

- a) Name
- b) Name of employer
- c) Business address
- d) Business email address
- e) Business telephone number
- f) IP address
- g) Website user activity
- h) Job title

C – Why We Collect Your Personal Data and Our Lawful Bases?

Representatives of our Existing or Prospective Customers, Distributors and Vendors

We may use your personal data to:	Our lawful basis for doing so is:	Our legitimate interests in doing so are:
Provide you with our services	Legitimate Interest	Efficiently fulfil our contractual and legal obligations Management reporting (including at an intra-group level)
Establish and manage our relationship		Efficiently fulfil our contractual and legal obligations Account management
Learn about how our products are or may be used		Exercise or defend legal claims Understand the market in which we operate Management reporting Provide technical support 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 Management reporting (including at an intra-group level)

If you object to us using your contact details for these purposes, including direct marketing, please email us at support@disperse.io.

Where we use your email to communicate marketing information to you, we may need to obtain your prior consent where required 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. These images are used for:

- The provision and maintenance of our software
- The development and improvement of our products and services

Note: Images of individuals are not used to provide the service itself.

B – Personal Data That We Collect and Process

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

- a) Name
- b) Email address
- c) IP address
- d) User activity
- e) Camera footage and environment scansf) Login credentials (username, password, etc.)

C – Why We Collect Your Personal Data and Our Lawful Bases

Data relating to you flowing through the products and services we provide our corporate customers

We may use your personal data to:	Our lawful basis for doing so is:	Our legitimate interests in doing so are:
Provide our customers with our services	Legitimate Interest	Efficiently fulfil our contractual and legal obligations Management reporting
Establish and manage our relationship		Efficiently fulfil our contractual and legal obligations Account management Exercise or defend legal claims Understand the market in which we operate Management reporting
Learn about how our products and services are or may be used		Understand the market in which we operate Management reporting 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
- Our systems' records

B – Personal Data That We Collect and Process

We may collect the following categories of personal data:

- a) Name
- b) Business contact details
- c) Organisation
- d) Role
- 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

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

If you object to us using your personal data for these purposes, please send an email to us at 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) When you subscribe to any of our services
- d) When you request further information via the website
- e) When you report a problem with the website
- f) From your device or browser
- g) If you contact us, we may keep a record of that correspondence

B – Personal Data That We Collect and Process

We may collect and process the following categories of personal data:

- a) Name
- b) Username
- c) Email address
- d) Phone number
- e) Postal address
- f) Operating system
- g) Browser type
- h) Products or services you viewed or searched for
- 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
- l) IP address

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

Website Visitors

We may use your personal data to:	Our lawful basis for doing so is:	Our legitimate interests in doing so are:
Provide our website services to you, your employer, or our clients	Legitimate Interest	Website management Promote our products and services Account management Notifying you of any changes to our products
Establish and manage our relationship	Legitimate Interest	Understand the market in which we operate
Learn about our website(s) users' browsing patterns and the performance of our website(s)	Legitimate Interest	Management reporting Account management Make suggestions and recommendations to you about products or services that may interest you Website management, including troubleshooting, data analysis, testing, research, statistical, and survey purposes
Manage security	Legitimate Interest	Managing security, risk, and crime prevention 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	Legitimate Interest	Promote our products and services Management reporting
Learn about how our products or services may be used	Legitimate Interest	Understand the market in which we operate Management reporting

If you object to us using your personal data for these purposes, including direct marketing, please send an email to us at **support@disperse.io**.

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

- a) Use cookies or similar technologies for 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.

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 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 have 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) 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 part of our business.

Any personal data 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 defence of legal claims or our legitimate interests.

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

5. CALIFORNIA RESIDENTS

Notwithstanding anything to the contrary in this Notice, the following provisions apply 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 the **Disperse Cookie Notice** for details of third parties that may track your online activity over time.

6. YOUR RIGHTS

We comply with UK GDPR, and applicable data protection laws may 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*), enabling you to receive a copy of the personal data we hold about you and check that we are lawfully processing it.
- **Request rectification, correction, or updating** of any of the personal data we hold about you, ensuring any incomplete or inaccurate information is corrected.
- **Request data portability** for personal data provided by you, enabling you to receive the data in a machine-readable format and transfer it to another supplier.
- **Request erasure** of personal data, allowing you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You may also request erasure where you have exercised your right to object to processing (see below).
- **Request restriction of processing** of your personal data, allowing you to ask us to suspend the processing of personal data about you (e.g., while its accuracy or the reason for



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processing is being verified).

- **Object to the processing** of your personal data in certain circumstances, including where:
 - The processing is based on our legitimate interests (as explained above)
 - Decisions about you are based solely on automated processing, including profiling
 - Your personal data is being processed for direct marketing purposes

These rights are not absolute and are subject to 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 consent or withdraw consent at any time.

These rights are not absolute and are subject to various conditions under applicable data protection and privacy legislation, as well as 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 **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.

7. 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 version.

This version was last updated on 14 June 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 (Millennium Disperse) Information Technology Co	Saudi Arabia