

NC SQUARED LIMITED PRIVACY POLICY

1. INTRODUCTION

NC Squared is committed to safeguarding the privacy of our website users, users of our *Booking Engine* and *Distribution Engine* software, and the personnel of our customers, prospective customers and suppliers.

For users of our *Booking Engine* software, this policy should be read alongside our supplemental privacy policy for *Booking Engine*, available here:

<https://nc-squared.com/booking-engine/privacy-policy>

In this policy, "we", "us" and "our" refer to NC Squared Limited, NC Squared, Inc and our other group companies from time to time. Information about our group companies is set out at the end of this policy.

When does this policy apply?

This policy applies where we act as a "controller" of personal data. In most cases, we act as a controller.

However, with respect to the personal data supplied to us under a support ticket, we do not act as a controller; instead, we act as a processor. Our legal obligations as a processor are set out in the contracts between us and our customers, and this policy does not apply with respect to our handling of that data.

2. THE PERSONAL DATA WE COLLECT

In this table, we have set out the general categories of personal data that we process and information about the source and specific categories of that data.

Data category	Details	Sources of data
Customer data	Data stored in our own customer relationship management system; this may include your name, your company name, your email, your company telephone number, your mobile phone number, your country, as well as categorisation data and the content of communications that you send to us or vice versa.	You or your employer
Marketing data	Data processed for the purposes of our direct marketing activities and targeted advertising: your name, email address, marketing preferences and marketing history.	You or your employer; LinkedIn
Other communication data	Contact details and communication content not included in the above categories.	You or your employer; LinkedIn

Calendar, availability and booking data	Calendar data regarding the availability of users and bookings made by users of our <i>Booking Engine</i> software.	Our integrated calendar services providers
Usage and analytics data	Data about your use of our website and software-based services, which may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use.	Our analytics systems
Endorsement data	Data about you included in and relating to reviews, testimonials and customer case studies, including data provided to us by you via our review form. This data may include your name, your picture, your email address, your job title/role and your company name.	You or your employer; Salesforce, LinkedIn and our other services providers

If you contact us via an online form, then metadata relating to that contact may be generated automatically by our systems. This could include the date and time of your contact, and associated usage and analytics data.

3. PURPOSES OF PROCESSING AND LEGAL BASES

In this table, we have set out the purposes for which we may process personal data and the legal bases of the processing.

Purpose of processing	Details	Legal basis of processing
Relationships	We may use customer data and other communication data for communicating with you, including complaint handling.	Legitimate interests: the establishment, development, maintenance and management of our commercial relationships; and enabling the effective provision and use of our software and services.
Operations	We may use customer data and other communication data in the course of contracting with customers and providing our services to customers; we may also use this data when generating invoices, payment and taxation documentation, and for credit control.	Legitimate interests: developing, operating, monitoring and securing our software, services, website and business operations generally.

Marketing	We may use marketing data and usage and analytics data for sending direct marketing communications, targeting advertisements and managing direct marketing and advertising processes.	Legitimate interests: keeping our customers informed about our products and services. From time to time, we may also undertake consent -based direct marketing.
Customer endorsements	We may publish and otherwise use your endorsement data for the purpose of marketing and promoting our services, including on our website.	Legitimate interest: providing transparency and credibility to prospective customers by displaying authentic customer feedback about our services.
Research and analysis	We may use your personal data for the purposes of researching and analysing the use of our website and services, as well as researching and analysing other interactions with our organisation.	Legitimate interests: monitoring, supporting, improving and securing our software, services, website and business operations generally.
Record keeping	We may use your personal data for the purpose of creating and maintaining our databases, back-up copies of our databases and our organisation records generally.	Legitimate interests: ensuring that we have access to all the information we need to properly and efficiently run our organisation in accordance with this policy.
Security	We may use your personal data for security purposes and the prevention of fraud and other criminal activity.	Legitimate interests: ensuring the security of network and information systems; the protection of our website and organisation, and the protection of others.
Insurance and risk management	We may use your personal data where necessary for the purpose of obtaining or maintaining insurance coverage, managing risks and/or obtaining professional advice.	Legitimate interests: the proper protection of our organisation against risks.
Business transactions	We may use your personal data to evaluate or conduct a merger,	Legitimate interests: the management, administration, development and

	divestiture, restructuring, reorganisation, dissolution, sale or other corporate transactions.	transformation of our business.
Legal claims	We may use your personal data where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.	Legitimate interests: protection and assertion of our legal rights, your legal rights and the legal rights of others.
Legal compliance and vital interests	We may use your personal data to stay compliant with applicable law regulations.	Compliance with legal obligations and protection of vital interests.

Calendar, availability and booking data may be used in accordance with the privacy policy at:

<https://nc-squared.com/booking-engine/privacy-policy>

Occasionally, we may process your personal data for a different purpose, but only where that purpose is compatible with the original purpose for which the data was collected, and subject always to applicable law.

Where we rely on legitimate interests to process personal data, we will ensure that those legitimate interests are recognised in law, or that we balance our interests with your own interests, rights and freedoms, ensuring that we protect these as required by law.

4. PROVIDING YOUR PERSONAL DATA TO OTHERS

Our group companies (listed at the end of this policy) act as joint controllers of your personal data with respect to the processing described in this policy and may share personal data insofar as reasonably necessary for internal administrative purposes (this sharing is on the basis of our **legitimate interests**).

We may share your personal data with our services providers and providers of integrated services, as detailed at:

<https://nc-squared.com/service-providers>

When you use *Booking Engine*, we may share limited **calendar, availability and booking data** with our integrated calendar services providers, but only insofar as necessary to enable make *Booking Engine* work. For more details, see:

<https://nc-squared.com/booking-engine/privacy-policy>

We may also disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice.

We may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

We may disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

5. INTERNATIONAL TRANSFERS OF YOUR PERSONAL DATA

We and our other group companies have offices in the UK and USA. Transfers to the USA will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the competent data protection authorities.

We may transfer your personal data from the European Economic Area (EEA) to the UK and process that personal data in the UK for the purposes set out in this policy, and may permit our suppliers and subcontractors to do so, during any period with respect to which the UK benefits from an adequacy decision under EU data protection law; and we may transfer your personal data from the UK to the EEA and process that personal data in the EEA for the purposes set out in this policy, and may permit our suppliers and subcontractors to do so, during any period with respect to which EEA states benefit from adequacy regulations under UK data protection law.

In addition, we may transfer your personal data to our services providers, and permit those services providers to transfer your personal data, in those jurisdictions detailed in the pages linked to in Section 4 above, subject to the specified safeguards.

6. RETAINING AND DELETING OF PERSONAL DATA

Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

This table sets out our maximum data retention periods – in each case following the specified reference date.

Data category	Maximum retention period	Reference date
Customer data	7 years	The later of: (i) the date of the termination of the relevant customer contract; and (ii) the date of the last communication between us and the relevant customer.
Marketing data	7 years	The date of sending of the last marketing communication.
Other communication data	7 years	The date of the collection of the data.

Calendar, availability and booking data	N/A	Storage of this data in our systems is transient.
Endorsement data	3 years	The last date of publication or use of the relevant endorsement data.
Usage and analytics data	7 years	The date of collection of the data.

Notwithstanding the foregoing, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or to protect your vital interests or the vital interests of another natural person.

7. YOUR RIGHTS

In this table, we have listed the rights that you have under data protection law.

Your rights	What you can do
Right to access	You can ask for copies of your personal data
Right to rectification	You can ask us to rectify inaccurate personal data and to complete incomplete personal data
Right to erasure	You can ask us to erase your personal data
Right to restrict processing	You can ask us to restrict the processing of your personal data
Right to object to processing	You can object to the processing of your personal data
Right to data portability	You can ask that we transfer your personal data to another organisation or to you
Right to complain to a supervisory authority	You can complain about our processing of your personal data
Right to withdraw consent	If the legal basis of our processing is consent, you can withdraw that consent

These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting:

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

You may exercise any of your rights in relation to your personal data by written policy to us, using the contact details set out below.

8. THIRD PARTY WEBSITES

Our website includes hyperlinks to, and details of, third party websites. In general, we have no control over, and are not responsible for, the privacy policies and practices of third parties.

9. UPDATING INFORMATION

Please let us know if the personal information that we hold about you needs to be corrected or updated.

10. AMENDMENTS

We may update this policy from time to time by publishing a new version on our website. You should check this page occasionally to ensure you are happy with any changes to this policy.

11. OUR DETAILS

Details of our group companies are set out in this table.

Company name	Jurisdiction / number	Address
NC Squared Ltd	England and Wales / 07823906	60 Windsor Avenue, London, England, SW19 2RR
NC Squared, Inc	Delaware, USA	2810 N Church St PMB 74040, Wilmington, DE, 19802-4447.

12. PERSONAL DATA MANAGER AND REGISTRATION

Our personal data manager with respect to our obligations under data protection law can be contacted by writing to privacy@nc-squared.com.

If you have any complaints regarding our handling of personal data, please address them to the data protection manager.

We are registered as a data controller with the UK Information Commissioner's Office. Our data protection registration number is ZB941157.

If you are unsatisfied with how your data has been processed, you may also lodge a complaint at the Information Commissioner's Office.

Contact details for the Information Commissioner's Office can be found at:

<https://ico.org.uk/global/contact-us/contact-us-public/>