

January 2022 Edition

Mobile Application Privacy Policy



PLEASE READ THIS PRIVACY POLICY CAREFULLY

1. Who we are and why are we asking you to agree to this Privacy Policy

We are Cureoscitiy Technologies Ltd, a company registered in England with registration number **13774041** (“**Cureoscitiy Technologies**”). Cureoscitiy Technologies has been engaged by the owners of certain buildings (or their representatives responsible for managing such buildings) to create an App to enable users and visitors to access and navigate those buildings. Cureoscitiy Technologies handles personal data inputted into the App on behalf of the entity which owns the building to which the App relates, and the agents who manage the building on behalf of the owner. The controller of the personal data you input into the App is the owner of the building. For more details about the owner of the building (the controller of your personal data), you should contact the managing agent of the building and/or refer to your lease agreement (the “**Owner**”). In this Privacy Policy the Owner and Cureoscitiy Technologies are collectively referred to as “we”, “us” or “our”, except where expressly stated otherwise. Please refer to the Privacy Policy provided to you in the App registration process for the Owner’s identity and details.

Cureoscitiy Technologies Ltd require you to agree to this Privacy Policy so it is able to give you access to the App for the relevant building when you register to use the App for such building. This includes allowing you to use the App in order to access and navigate the relevant building, to update content on the App, to access and use management portals relating to the App (where you have the necessary permissions) and/or to provide services to facilitate management and administration of the building. This Privacy Policy tells you how your personal data will be handled.

If you want to get in touch, our contact details are:

Cureoscitiy Technologies:

Email: support@cureoscitiy.com

2. Privacy and how your personal data is used

The Owner is the controller of the personal data you input when you register to use the App. Cureoscitiy Technologies is the Owner's processor of the personal data you input into the App. We are both responsible for keeping your personal data safe and secure. Under data protection laws, we are required to provide you with certain information about who we are, how we process your personal data and for what purposes. That information is included in this Privacy Policy.

2.1 What personal data is collected?

We may collect, use, store and transfer different kinds of personal data about you. Primarily this personal data comprises your name, your work email address, date of birth and details of the entity within the building for whom you work. Depending on the settings you choose, this data may also include data regarding your device, your usage of the App, communications data and your location data.

We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data) through the App. Nor do we collect any information about criminal convictions and offences.

2.2 How is your personal data collected?

Information you provide. This is information (including personal data about your identity and contact information) you give us by filling in the registration form on the App. If you contact us, we will keep a record of that correspondence.

Information collected about you and your device. Each time you use the App it will automatically collect personal data including information about your device, and data relating to your use of the App. This data is collected using cookies and other similar technologies. Please see the App Cookie Policy for further details.

Location Data. In order to use the App to its full extent we would like to process your location data. We can provide certain services to you more efficiently if we have your location data. We use GPS technology to determine your current location. Some of our location-enabled services require your personal data for the location based features to work. If you want to use such location based features and services you will need to consent to the use of such location based features and services by activating the location-enabled preferences on your device in your settings. You do not need to enable location settings to use the App, but if you chose to disable location settings, you may not be able to experience the full benefits of the App. You can withdraw your consent at any time by disabling location data in your settings.

Visitor Data. Part of the functionality in our App enables limited information to be recorded about visitors to your building (so their visit to the building can be as smooth as possible). This information is limited to the name of the visitor and company associated with the visitor, together with the visitor's email address where required (this is optional). You should notify visitors that their information will be recorded in the App, and not record their data in the App if they object to this. Any personal data about visitors will be handled in line with this Privacy Policy and any visitor will be able to exercise all rights available to data subjects as detailed in this Privacy Policy. A copy of this Privacy Policy is available on our website for all visitors to access.

Information received from other sources including third parties and publicly available sources. We may receive personal data about you from the organisation who manages the property to which the App relates, in order to verify that you are permitted to use the App.

2.3 What is the legal basis under which we use your personal data?

We will only use your personal data when the law allows it to do so. The lawful bases that we rely upon to process your personal data are a) where we have a legitimate interest that is not overridden by your own rights or interests, and b) where we have obtained your consent prior to the processing.

One of the features of the App is to send you notifications containing information, promotions and offers which are relevant to the building to which the App relates. In order to receive such notifications you will need to activate the App notification preferences on your device. You do not have to activate such notifications, but you may not be able to experience the full benefit of the App if you do not do so. Visitors to your building will not be sent notifications.

2.4 Is your personal data shared with any third parties?

We use Amazon Web Services EMEA SARL (AWS), a cloud service provider to store personal data. Personal data is stored in the cloud, and in data centres based in London and Dublin.

2.5 International transfers

We do not transfer your personal data outside the UK and European Economic Area (EEA).

2.6 How is your personal data kept safe?

All information you provide through the App is stored on Cureoscitiy Technologies' secure servers. Any payment transactions carried out using chosen third-party providers of payment processing services will be encrypted using Secured Sockets Layer technology. Where you have a password that enables you to access the App, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Once Cureoscitiy Technologies has received your information, it will use strict procedures and security features to try to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way.

Cureoscitiy Technologies will collect and store personal data on your device using application data caches and browser web storage (including HTML) and other technology. Please see the App Cookie Policy for more information.

We have put in place procedures to deal with any suspected personal data breach and will notify us, and we will notify you and any applicable regulator about such breach when we are legally required to do so.

2.7 How long is your personal data kept?

Your personal data will be kept for as long as you are a user of the App and for a reasonable period thereafter, with the exception of your date of birth, which we only keep for as long as is necessary to validate your use of the App. If you do not use the App for a period of two years then we will treat the account as expired and your personal data may be deleted.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

2.8 What are your rights in respect of your personal data?

You have a number of rights in relation to your personal data, including the right to:

- Be informed about how we use your personal data
- Obtain access to your personal data that we hold
- Request that your personal data is corrected if you believe it is incorrect, incomplete or inaccurate
- Request that we erase your personal data in certain circumstances
- Ask us to restrict our data processing activities in certain circumstances
- Request a copy of your personal data in a commonly used electronic format and relating to information that you have provided to us that we need in order to perform our agreement with you
- Object to our processing of your personal data where we are relying on legitimate interests or exercise of a public task as our lawful basis
- Not be subject to wholly automated decisions which produce legal effects or which could have a similarly significant effect on you

If you would like to exercise any of these rights, please send your request via email to Cureoscitiy Technologies who will liaise with the Owner to action your request.

2.9 Concerns or complaints about how your personal data is handled.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues or other competent supervisory authority of an EU member state if the App is downloaded outside the UK.

3. General Terms

- **Which laws apply to this contract and where you may bring legal proceedings.** This Privacy Policy is governed by English law and you can bring legal proceedings in respect of the App in the English courts. If you live in Scotland you can bring legal proceedings in respect of the products in either the Scottish or the English courts. If you live in Northern Ireland you can bring legal proceedings in respect of the App in either the Northern Irish or the English courts.
- **Changes to this Privacy Policy.** We keep our Privacy Policy under regular review. This Privacy Policy may change and if it does, these changes will be notified to you when you next use the App. If you do not accept the notified changes you will not be permitted to continue to use the App.