

VoloForce Privacy Notice

SCOPE

All data subjects whose personal data is collected, in line with the requirements of the GDPR in the context of VoloForce's marketing activities.

RESPONSIBILITIES

The Data Protection Officer is responsible for ensuring that this notice is made available to data subjects prior to VoloForce collecting/processing their personal data.

All Employees/Staff of VoloForce who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

PRIVACY NOTICE

Who are we?

VoloForce provides Software as a Solution Task Management solutions with a difference. Founded on two very simple premises, with the belief that if you can measure your operational performance then you can manage it. In addition, consistent and regular communication with employees keeps them engaged and productive.

Our suite of tools were created as an operational platform for multi-site businesses, to deliver operational perfection.

For further details on who we are please visit: <u>http://www.voloforce.com/</u>

Our Data Protection Officer and data protection representatives can be contacted directly here:

- By emailing info@voloforce.com
- By calling 1+(877)-836-4901 in the USA, or +44 208 068 6900 outside of the USA.
- By Mail:

The Orchard 8 Harlequin Avenue Brentford Middlesex TW8 9EW

The personal data that we might collect from you is listed in detail in Appendix A of this Privacy Notice.

The personal data we collect will be used for the following purposes:

- Sending Data Subjects relevant information about completing tasks in their role
- Sending Data Subjects relevant information about VoloForce and our products to promote our brand

The legal basis we use for processing of the personal and other data we hold are:

- Consent
- Contract
- Legitimate interests

In the absence of a Contract or Consent, VoloForce performs regular Legitimate Interest Assessments (LIA) on the data we hold to understand if we have a legitimate interest to continue to process that data.





We use approved third parties, vetted in accordance with the guidelines contained in the GDPR and other information security legislation.

VoloForce DOES NOT collect or process data defined as 'special categories' by the ICO such as: Racial; Ethnic origin; Political opinions; Religious beliefs; Philosophical beliefs; Trade union membership; Genetic data; Biometric data; Health data; Data concerning a natural person's sex life or Sexual orientation.

EU-US Privacy Shield Framework

VoloForce complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. VoloForce has certified to the Department of Commerce that it adheres to the Privacy Shield Principles.

Consent

By consenting to receive information from VoloForce you are giving us permission to process your personal data specifically for the purposes identified, normally for a minimum period of 12 months from the date of consent.

You may withdraw consent at any time by contacting the Data Protection Officer via any of the contact channels defined above.

Disclosure

VoloForce will not pass on your personal data to third parties without first obtaining your consent. The following third parties will receive your personal data for the aforementioned purposes as part of the processing activities:

Organisation name & geographic location	Safeguards in place to protect your personal data	Retrieve a copy of the safeguards in place here
Insightly, United States	EU-U.S. and Swiss-U.S. Privacy Shield Framework	https://www.insightly.com/gdpr/

Retention period

VoloForce will process personal data indefinitely whilst you are continuing to engage with VoloForce and will store the personal data for one year after the last engagement with VoloForce, after which it will be archived and be subject to our data retention policy.

Your rights as a Data Subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access you have the right to request a copy of the information that we hold about you.
- Right of rectification you have a right to correct data that we hold about you that is inaccurate or incomplete.





- Right to be forgotten in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing where certain conditions apply to have a right to restrict the processing.
- Right of portability you have the right to have the data we hold about you transferred to another organisation.
- Right to object you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that VoloForce refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in the Complaints statement below.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by VoloForce (or third parties as described above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and VoloForce's Data Protection Officer.

The details for each of these contacts are:

	Supervisory authority contact details	DPO Contact details
Contact Name	Information Commissioner's Office (ICO)	VoloForce DPO
Contact Details	https://ico.org.uk/concerns/	info@voloforce.com

ONLINE PRIVACY STATEMENT

Personal Data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

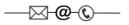
How we use your information

This privacy notice tells you how we, VoloForce, will collect and use your personal data for the purposes of sending Data Subjects relevant information about Task Management and sending Data Subjects relevant information about VoloForce to promote our brand.

Why does VoloForce need to collect and store personal data?

We need to collect personal data for accurate, relevant and timely correspondence purposes. In any event, we are committed to ensuring that the information we collect, and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

Will VoloForce share my personal data with anyone else?





We may pass your personal data on to third-party service providers contracted to VoloForce in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with VoloForce's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

How will VoloForce use the personal data it collects about me?

VoloForce will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR) and other relevant legislation. We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. VoloForce is required to retain information in accordance with the law, such as information needed for tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

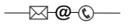
Under what circumstances will VoloForce contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

Can I find out the personal data that the organisation holds about me?

VoloForce at your request, can confirm what information we hold about you and how it is processed. If VoloForce does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of VoloForce or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful
 information about the logic involved, as well as the significance and expected consequences of such
 processing.





What forms of ID will I need to provide in order to access this?

VoloForce accepts the following forms of ID when information on your personal data is requested. We will need two copies of forms of identification, which can be:

- Passport
- Driving licence
- Birth certificate

Once ID has been approved these records will not be retained.

To request information on your personal data please email <u>info@voloforce.com</u> and you will then be asked to complete a Data Subject Access Request form and return to the VoloForce DPO.

Document owner

The Data Protection Officer is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.





Appendix A

- Company Name
- Job Title
- First Name
- Last Name
- Email
- Website URL
- Mobile Phone Number
- Phone Number
- Fax Number
- Work Address
- Agree to the Privacy Policy
- Challenge or Objective
- Marketing Activity Dates
- Industry
- Lead Source
- Size of organisation
- Twitter Username
- LinkedIn Profile URL
- LinkedIn Company Page
- Email history
- IP Address
- IP Country Code
- IP State Code/Region Code
- IP Timezone
- IP Country
- IP State/Region
- IP City
- NDA Returned Signed

