

LexAble Services Limited – Privacy Policy

LexAble Services Limited is the owner and provider of the product known as Global Tasks (the **Product**).

We are committed to protecting and respecting your privacy as a user of the Product and this policy sets out the basis on which we, in our capacity as a data controller, will collect and process your personal information when you use the Product. Please read the following carefully to understand our views and practices regarding your personal information and how we will treat it. By using our Product, you are accepting and consenting to the practices described in this policy.

The Product may be accessed and used by you in various ways, including through our website or mobile applications. This policy applies whichever way you decide to access or use the Product.

Information we may collect

We may collect and process the following data about you:

- **Information you give us.** You may give us information about you from time to time, for example if you email us with questions or comments in relation to the Product. The information you give us may include your name, address, e-mail address and phone number.
- **Information we receive from other sources.** In order to sign in and use the Product, you must use your Google account. When you do this, we receive information about you from Google, namely your name and email address. When you use the Product, any personal information that you save as part of your tasks is stored in your Google drive and we will process it from time to time during the course of you using the Product. We also use Google Analytics to track and report your use of the Product so that we can understand how the Product is used and continuously improve it.

Please note that Google will also have its own control of the information obtained through Google Analytics. It will hold this information on its servers in the United States in accordance with its own privacy policies. More information on how Google will use the information from Google Analytics can be found at: www.google.com/policies/privacy/partners/.

How we use your information

We use information held about you in the following ways:

- **Information you give to us.** We will use this information:
 - to carry out our contractual obligations to you in respect of the Product (i.e. to provide the Product to you); and

- to provide you with any support that you may require in respect of the Product from time to time;
- **Information we receive from other sources.** We will only use the information we receive from Google for the purposes of providing the Product to you and allowing you to use the various Product functions. Additionally, the data we receive from Google Analytics is used to understand how the Product is being used and to improve the Product from time to time.

Legal basis for our use of your information

When you use the Product, we process your personal data for the purpose of fulfilling our contract with you in respect of the Product. In all other circumstances, we will only process the personal data where we have a legitimate interest in doing so or you have consented to our processing. For example, we have a legitimate interest in processing the data provided by Google Analytics so that we can understand how the Product is being used and improve it in the future.

We need your consent before we can process any sensitive or special category data about you (such as data about your health, racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life, or details of criminal offences). Although we do not routinely ask for this type of data, where you have voluntarily provided us with it, you are consenting for us to process it. However, you may choose, at anytime, to withdraw your consent.

How long we keep your personal information

We keep the personal information held about you for the following time periods:

- **Information you give to us.** We will keep the personal information you provide to us for as long as is reasonably necessary after collection, after which we will promptly remove your personal information from our systems. For example, if you contact us with a query, we will keep your information for as long as is necessary to enable us to respond to your query;
- **Information we receive from other sources.** As above, we will only keep the personal information we receive about you from any other sources for as long as is reasonably necessary, after which we will remove your personal information from our systems. For example:
 - we will keep your name/email address (provided by Google) for the duration of your subscription to the Product and a reasonable period thereafter; and
 - any personal information transferred from your Google drive is only processed temporarily, whilst you use the Product, and is immediately removed from our systems thereafter.

We never use your personal information for the purposes of profiling (where an electronic system uses personal information to try and predict something about you) or automated decision making (where an electronic system uses personal information to make a decision about you without human intervention).

Disclosure of your information

We may also disclose your personal information to third parties in the following circumstances:

- When using the Product, any personal information that you may include in your tasks will be stored in your Google drive and, in order to facilitate this, it is necessary for us to transfer such information to Google.
- We use a range of external IT providers in order to run our business efficiently, provide the Product to you and ensure that the Product is continuously improved - some of these services may involve the service provider receiving, holding and using your personal information. For example:
 - we may use external suppliers for the management of our customer database and external email platforms (including, for example, Mailchimp) for administering emails to our customers; and
 - when using the Product, we may send analytics data (which may include personal information such as your name and email address) to other external suppliers beyond Google Analytics (including, for example, Intercom, Inc. and Microsoft AppCentre) so that we can better understand how you are using the Product and continuously improve your experience of the Product.
- If LexAble Services Limited, or its assets, are acquired by a third party, any personal information held by us in respect of our customers may be one of the assets that is transferred to that third party.
- If there are benefits to you or our business, we may share your personal information with other companies within our group (for example, where shared services or shared infrastructure is used).
- If we are under a duty to disclose or share your personal information in order to comply with any legal obligation that we may have.

Where we store your information

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for our suppliers. Such staff maybe engaged in, among other things, the provision of other support services in relation to the Product. However, we will only transfer your personal information outside of the EEA to

countries that have been found to ensure an adequate level of protection and we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Your rights

You have certain rights, under data protection legislation, in relation to the personal information that we hold about you. Your rights include:

- The right to access your personal information.
- The right to rectification of your personal information.
- The right to erasure of your personal information.
- The right to restrict or object to the processing of your personal information.
- The right to data portability.
- The right to object to receiving marketing communications from us.
- The right to complain to your supervisory authority, in the UK this is the Information Commissioner's Office (ICO), about the use of your personal information.

You can contact us about your rights at any time by emailing hello@lexableservices.com.

Changes to this privacy policy

Any changes we may make to our privacy policy in the future will be posted on our website/mobile applications and, where appropriate, notified to you by e-mail.

Contact

Our nominated representative for the purpose of data protection legislation is our Data Protection Officer who you may contact at hello@lexableservices.com. Questions, comments and requests regarding this privacy policy are welcomed and should also be sent to this email address.

Last updated: July 2020