# TAAP Accelerate Privacy Notice

## Introduction

The privacy of your data is important to TAAP Ltd ("TAAP", "Us", "We" or "Our"). We are a United Kingdom based company providing B2B cloud-based no code software solutions for our global customers.

This privacy policy (the "Privacy Policy" or "Policy") was created to inform customers ("You") of how TAAP will collect and use your information in accordance with UK GDPR and the choices you can make about the way your information is collected and used. If you can't be identified, then this Policy doesn't apply to you.

We will never sell your Personal Data to anyone. This Privacy Policy may be updated from time to time, but we will version control and date stamp revisions.

### Definitions

- "Client" means a customer of TAAP.
- "Client Data" means Personal Data, addresses, intellectual property with regard to form design, branding and structure, files, folders or documents in electronic format that a User of the Service stores within the Service.
- "Personal Data" means any information relating to a natural person that may be used to identify them such as their name, email, address, telephone number, payment information, support queries, comments on our website, and so on.
- "Service" means the TAAP Accelerate Platform for creating business apps or any other associated TAAP products or services available to download from the Microsoft Azure Marketplace.
- "Subscriber" means an employee, agent or representative of the Client who is in the process of filling out the registration form to use the Service.
- "User" means an employee, agent or representative of the Client who's details have been provided by the Subscriber at the point of subscribing for registration, support and billing purposes.
- "Data Controller" an entity or organisation that determines the purposes and means of processing personal data. In other words, the data controller is responsible for making decisions about how and why personal data is processed.
- "Data Processor" is an entity or organisation that processes Personal Data on behalf of a Data Controller. Unlike the Data Controller, the Data Processor acts under the instructions and authority of the Data Controller and does not determine the purposes and means of processing.
- "Operational Data" Client's data processed and held on the Clients own Microsoft Azure instance. TAAP have no access to Operational Data.

## The Information We Collect

In light of the UK GDPR legislation on the protection of personal data (the "General Data Protection Regulation", known as the "GDPR" 2016/679 and Data Protection Act 2018), we would like to disclose, in a transparent manner, our data processing operations with respect to the personal data collected by your use of our Services.

Kindly observe that this Privacy Notice does not apply to any external products or services such as applications or software that integrate with other services ("Third Party Services"). Furthermore, please note that our Service may contain links, embedded or not, to external websites and services that have privacy policies of their own and fall outside the scope of this Privacy Notice.

We are committed to ensuring that the Subscriber's personal data is kept confidential, and that it is only collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes. For any question regarding the collection or processing of your personal data, or for any request to exercise your rights in relation to your personal data, you can contact us in writing at any time to dataprotectionofficer@ontaap.com.

For more details on data processing, its scope and purpose, the relationship between the Data Controller and the Data Processor, please visit our <u>Data Processor Agreement (DPA)</u>.

As a Subscriber the following details are required for the purpose of registration, support and billing.

- First name
- Last name
- Email address
- Mobile
- Organisation
- Website address

#### How We Use The Information We Collect

For any Personal Data that we collect, we'll only process it to perform a contract with you for access to the Service, or Where we have a legitimate interest to process the Personal Data and that is not overridden by your rights, or where we have a legal obligation to do so, or where we have your consent. We may from time to time communicate to the User's (register, support and billing contacts) about the TAAP Services to which you have subscribed.

If we don't collect your Personal Data, we will be unable to provide you with all of our Service.

If you are not a User of the Services but believe that a Client of ours has entered your Personal Data into our Services as a part of their Client Data then this Privacy Policy does not apply to you. This provision does not apply to Personal Data that is a part of Client Data. The management of Client Data is subject to the Client's own Privacy Policy and any requests to access, amend or delete this Personal Data should be made directly to the Client responsible for uploading such data into the Service. If the Client requests in writing that we remove the Personal Data we will respond within thirty days. If we have a legal right to retain such Personal Data we will not delete it. We also reserve the right to retain a copy of the data for archiving and backup purposes or to defend our rights in litigation.

We use the information that we collect to operate our Services and provide you with our Services that you have requested. We may also use your Personal Data other ways, including:

 Communications – We may use a User's email address or phone number to communication directly with them. Communications will be for, but not limited to, providing support, answering questions, informing Users about updates to the Service, addressing issues with payment, of privacy, intellectual property violations or deformation.

#### How We May Share Your Data

From time to time we may need to share your Personal Data with others. We will only disclose this information to:

 Law Enforcement and Regulators – We may be required to provide Personal Data to law enforcement and government agencies, courts or other third parties where we think it's necessary to comply with applicable laws and regulations. We reserve the right to disclose Personal Data or other information that we believe, in good faith, is appropriate or necessary to defend our legal rights.

## Security of Your Data

For the data subjects that have been identified in this document, protecting personal data from access, loss or alteration is of the utmost importance to us. Registration data and contact information are stored in the Cloud, data centres within the United Kingdom.

In relation to the Subscriber and Users data we have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

All Operational Data is in the clients own Microsoft Azure subscription. TAAP are not a Data Processor for any of the Clients Operational Data and have no access to any Operational Data.

## Where will your personal data be processed?

Subscriber's data is stored and/or processed within the United Kingdom (UK).

## How long will we hold your data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected or to comply with applicable legal, tax or accounting requirements in accordance with our data retention policy. Following that period, we'll make sure it's deleted or anonymised.

Data will be held for the duration a User is licensed to use the Service. Should you wish to see a copy of our Data Retention Policy, this can be requested by email to dataprotectionofficer@ontaap.com.

## Your Rights

It's your personal data and you, as a data subject, have certain rights relating to it.

Under data protection law, you have rights including:

- Your right of access You have the right to ask us for copies of your personal information.
- Your right to rectification You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing You have the right to ask us to restrict the processing of your information in certain circumstances.

- Your right to object to processing You have the right to object to the processing of your personal data in certain circumstances.
- Your right to data portability You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

You can exercise these rights at any time by sending an email to dataprotectionofficer@ontaap.com.

If you're not happy with how we are processing your personal data, please let us know by sending an email to dataprotectionofficer@ontaap.com. We will review and investigate your complaint and get back to you within a reasonable time frame.

You may be able to refer your complaint to the relevant data protection authority. For the UK, this is the Information Commissioner's Office (ICO).

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113

This privacy statement was last updated: 27<sup>th</sup> July 2023 under version 1.2.