

TAAP Work From Home Privacy Notice

Privacy Notice

Last update: 19th October 2020, V3.0

Your privacy is important to us. Our goal is to make the TAAP Work From Home Application (“**app**”) a great experience while processing your personal data fairly and transparently. This Privacy Notice (the “Privacy Notice”) aims to describe how we process your personal data in the context of your use of the TAAP Work From Home Application and to inform you of the rights you hold as a result.

The **app** is designed to help users collate information in a structured format that can be used to create a PDF report that documents the users home working environment.

1. Introduction and applicability

In light of the European 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 **app**.

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 **app** contain links to external websites and those services will have privacy policies of their own and fall outside the scope of this Privacy Notice.

We are committed to ensuring that your 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 by email to: dataprotectionofficer@ontaap.com.

2. Who is responsible for the data processing?

TAAP Ltd, having its registered office at Kinetic Centre, Theobald Street, Borehamwood, Hertfordshire WD6 4PJ under company number 04962797 is the Data Controller and Data Processor for the processing of your personal data collected via the **app** and for the processing carried out when you subscribe to and/or use our Services on download of the **app**. TAAP Work From Home is one of many products incubated and built in the United Kingdom by TAAP Ltd.

TAAP is acting as a Data Processor if you have downloaded the **app** and have been requested to record information about your home working environment by your employer. TAAP is acting as a Data Controller if you have downloaded the **app** as a private individual. For the avoidance of doubt when you use the **app** you are requested to define in which capacity you are providing the information being gathered prior to the report being generated.

In which ever capacity TAAP is acting you are giving your consent to process the data as outlined in section 4.

3. What is personal data?

Personal data (which should be understood to include personally identifiable information, or PII for short) is any information relating to an identified or identifiable natural person. It is sufficient that the data shall allow us to establish a link (direct or indirect) between one or more data-pieces and a natural person.

Personal data does not include anonymous or non-personal data (i.e. information that cannot be associated with or tracked back to a specific individual) or personal data that has been independently anonymised. By your use of our Services, you in any case consent to the processing and using of anonymous and non-personal data that is no longer associated with any natural person.

4. Description of processing

The **app** generates a structured report as a record of your home working environment. The data you record is provided for the express purpose of generating the report.

The report because of the size and numbers of photos that could be captured would most likely exceed the size of most individuals email mailbox. The report is therefore available for download using a hyperlink.

To ensure the data captured and the report generated is sent to a valid users mailbox the **app** sends a verification email. This contains a link that must be pressed or clicked which the system will use as positive confirmation that we have a valid email address. This helps ensure that your report is sent to the email address supplied.

Once the email address has been verified, a hyperlink is sent in a subsequent email against which the report could be downloaded. The user may decide to forward the email and hyperlink to a 3rd party for download. What the user does with this hyperlink, which is effectively the output report of the **app** is outside the scope of this Privacy Notice.

The data collected consists of explicit structured input fields and general free text input fields into which the user of the **app** could collect any information, PII or other. As general guidance it is recommended you only collect the information that is necessary and relevant to complete the intended purpose of the report. Even as an individual you have a general duty of care to look after the information you collate.

The data will be stored in a database for a period of 60 days at which point it will be fully deleted on day 61.

5. For what purpose will we process your data? Will my personal data be shared?

Your data will be processed for specified, explicit and legitimate purposes as described in section [4].

We will only use your personal data for the purpose(s) for which it was originally collected, to generate an output report to document and record your home working setup. It will not be shared or made available with any other organisation.

We shall extract from your data, insights from which we shall build an internal database that aggregates information about the collective state of people and their work from home setup. These

insights derived from this will be used by TAAP for marketing and sales activity and will contain no personally identifiable data.

TAAP may or may not introduce a service to allow employers to import the output reports into a Work From Home Service. The Employer shall be able to make a request of an Individual/the author of a report to approve the import of their data into the Work From Home Service. Unless approved the data shall not be used for any other purpose. Further, the data shall be deleted from the **app** cloud service 60 days after it was collected.

We may, from time to time, use your personal data for reporting and for making improvements to our Services; in such instances we will always ensure an individual cannot be identified.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email with information, news, and offers on our services.

You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

If you have agreed that we can use your information for marketing purposes, you can change your mind easily, via one of these methods:

Send an email to: unsubscribe@ontaap.com or write to us at: Unsubscribe, c/o Data Protection Officer, Kinetic Centre, Theobald Street, Borehamwood, Hertfordshire WD6 4PJ.

We will never lease, distribute or sell your personal data to a third party without requesting your prior permission. We will not transfer your data to other third parties without informing you separately beforehand in the exceptional cases where we are either legally required on important public interest grounds, or for the establishment, exercise or defence of legal claims.

There is no automated decision making used.

6. Legal Basis for processing personal data

Our legal basis for collecting and using the personal data described above. However, we will generally only collect personal information from you where:

- We need the personal information to perform a contract with you upon signup and acceptance of our End User License Agreement (EULA);
- The processing is in our legitimate interest and not overridden by your right
- You have given your consent to do so

We have a legitimate interest in operating our services, for example when responding to your queries, improving our services, undertaking marketing.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the GDPR and your legal rights.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not.

7. Security of your data

Protecting personal data from access, loss or alteration is of the utmost importance to us. All data is stored in the Cloud, data centres within the United Kingdom.

Servers are updated with the latest security patches during scheduled routine maintenance.

The TAAP Product (referred to as our Services) accesses data using our secure API (short for: application program interface - how software components interact with each other forming the basis of software applications). The API uses encryption for data in transit, and every request must include a time-limited authentication token generated by the authentication system. User data is encrypted at rest. For support purposes, a limited number of senior engineers can access data via a virtual private network secure tunnel, controlled by private key-based secrets and multi-factor authentication.

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. The User has control over who they send their data to in the form of a PDF output report. 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.

8. Where will your personal data be processed?

User data collected via our **app** is only stored and/or processed within the United Kingdom.

Any transfer of your personal data will follow applicable laws and we will treat the information under the guiding principles of this Privacy Notice.

9. 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.

For the user's data submitted by the **app**, the data will be held for a period of 60 days only and will be deleted on day 61. Should you wish to see a copy of our Data Retention Policy, this can be requested by email to dataprotectionofficer@ontaap.com.

10. Data subject rights

It is your personal data and you, as a data subject, have certain rights relating to it. When it comes to marketing communications, you can ask us not to send you these at any time. Follow the unsubscribe instructions contained in the marketing communication, or send your request to unsubscribe@ontaap.com.

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 are 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 timeframe.

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