

Privacy Policy

This privacy policy deals only with our handling of data as a Controller of the data we hold for our own purposes on our systems and for the reasons set out in the Schedules at the end of this Privacy Policy.

This Privacy Policy does not deal with our handling of our Employees' and ex-employees' data as a Controller which is dealt with in a separate Privacy Policy which can be found [here](#).

This Privacy does not cover our handling of our Customers' data in their own instance on Hornbill for which they are the Controller and we are the Processor. Our legal obligations as a Processor are set out in our Terms of Service and Subscription Agreements which can be found [here](#).

This Privacy Policy does not cover the Processing of our SupportWorks Customers' data when we are providing support and consultancy services. Our legal obligations as a Processor in those circumstances are set out [here](#).

Although the UK has left the European Union Hornbill will continue to follow the principles set out in GDPR as enacted into UK Law by the DPA. Accordingly this Privacy Policy still refers to GDPR.

DEFINITIONS

In this Privacy Policy, unless the context otherwise requires, the following words and expressions mean:

“Controller”, “Processor”, “Processing”, “Data Subject” and “Personal Data” take the meanings given in GDPR;

“DPA”	Data Protection Act 2018 and any legislation amending, replacing and/or superseding such act
“EEA”	European Economic Area
“GDPR”	the General Data Protection Regulation (Regulation (EU) 2016/679)
“Law”	means any law, subordinate legislation within the meaning of Section 21(1) of the Interpretation Act 1978, bye-law, regulation, order, regulatory policy, mandatory guidance or code of practice, judgment of a relevant court of law, or directives or requirements with which Hornbill is bound to comply

DATA CONTROLLER

Hornbill Corporate Limited is the ultimate holding company for the following Hornbill Group companies:

- Hornbill Technologies Limited
- Hornbill SHPK

This Privacy Policy is applied consistently across these companies and the single point of contact for enquires about privacy is the CFO who can be contacted at data.privacy@hornbill.com. The CFO can be contacted by post at Hornbill Corporate Limited, 3rd Floor, 86-90 Paul Street, London EC2A 4NE UK.

If you are in the EEA, you may address privacy-related inquiries to our EU representative pursuant to Article 27 GDPR:

EU-REP.Global GmbH, Attn: Hornbill, Hopfenstr. 1d, 24114 Kiel, Germany
hornbill@eu-rep.global
www.eu-rep.global

INDIVIDUALS' RIGHTS

All individuals for whom we hold Personal Data have the following rights and our systems and processes will ensure that these rights are respected:

1. Right to be Informed

2. Right of Access
3. Right to Rectification
4. Right to Erasure
5. Right to Restrict Processing
6. Right to Data Portability
7. Right to Object
8. Rights in Relation to Automated Decision Making

These rights and our policies to ensure they are respected are considered in more detail in the following sections.

RIGHT TO BE INFORMED

Hornbill will inform all individuals about whom it holds Personal Data the following:

1. What is the purpose for which the data has been collected?
2. What is the lawful basis on which we process the data?
3. What categories of data are obtained and how do we ensure that only data that is needed for the purpose is collected?
4. Who are the recipients of the data, if any?
5. Which countries will we transfer the data to?
6. Where did we get the data from?
7. How do we ensure that the data is kept accurate and up to date?
8. How do we ensure that inaccuracies are corrected?
9. How do we ensure that data that is no longer required for the purpose for which it is collected is deleted?
10. How do we ensure that the data is secure?

Hornbill will provide these details to the individual at the time we collect the data from the individual if we collect the data directly from them.

Hornbill will provide these details no more than one month after obtaining the Personal Data if we have not collected it from the individual.

Hornbill will contact all individuals about whom it currently holds Personal Data as soon as practicable and will advise them of these details.

We will provide the details in a concise, transparent, intelligible, easily accessible way that uses clear and plain language.

RIGHT OF ACCESS

If you have been informed by Hornbill that we Process your Personal Data, you have the right to access your data so that you are aware of and can verify the lawfulness of the Processing Hornbill are doing.

Upon your request to Hornbill at the email or postal address given above Hornbill will provide you a copy of your data within one month.

Prior to releasing any data to you Hornbill will need to verify your identity using reasonable means.

Wherever possible Hornbill will make the data available to you in electronic format by means of a shared document.

Hornbill will provide a copy of the information free of charge. However, Hornbill may charge a 'reasonable fee' when a request is manifestly unfounded or excessive, particularly if it is repetitive.

Hornbill may also charge a reasonable fee to comply with requests for further copies of the same information. This does not mean that Hornbill will charge for all subsequent access requests.

The fee will be based on the administrative cost of providing the information and you will be notified of it in advance of Hornbill providing your data. If Hornbill charges a fee Hornbill will not comply with the request until we have received the fee.

Hornbill may extend the period of compliance by a further two months where requests are complex or numerous. If this is the case, Hornbill will inform the individual within one month of the receipt of the request and explain why the extension is necessary.

Where requests are manifestly unfounded or excessive, in particular because they are repetitive, Hornbill may as an alternative to charging a fee refuse to respond. Where Hornbill refuses to respond to a request, Hornbill will explain why to you. Hornbill will also inform you of your right to complain to the supervisory authority and to a judicial remedy without undue delay and at the latest within one month.

RIGHT OF RECTIFICATION

You have the right to have any Personal Data we Process corrected if it contains errors.

If the Personal Data contains errors, you should provide Hornbill with written arguments and evidence to clearly identify the errors for Hornbill.

Upon your request to Hornbill preferably at the email or postal address given above Hornbill will take reasonable steps within one month to satisfy itself that the data is accurate and to rectify the data if necessary. Hornbill will consider the arguments and evidence provided by you.

What steps are reasonable will depend on the nature of the Personal Data and what it will be used for. The more important it is that the Personal Data is accurate, the greater the effort Hornbill will put into checking its accuracy and, if necessary, taking steps to rectify it. For example, Hornbill will make a greater effort to rectify inaccurate Personal Data if it is used to make significant decisions that will affect an individual or others, rather than trivial ones.

It is also complex if the data in question records an opinion. Opinions are, by their very nature, subjective, and it can be difficult to conclude that the record of an opinion is inaccurate. As long as the record shows clearly that the information is an opinion and, where appropriate, whose opinion it is, it may be difficult to say that it is inaccurate and needs to be rectified.

Hornbill will in any event restrict the Processing of the Personal Data in question whilst we are verifying its accuracy.

Hornbill will let you know if we are satisfied that the Personal Data is accurate and tell you that you will not be amending the data. Hornbill will explain our decision and inform you of your right to make a complaint to the ICO or another supervisory authority; and your ability to seek to enforce their rights through a judicial remedy.

Hornbill will place a note on our systems indicating that you have challenged the accuracy of the data and your reasons for doing so.

Hornbill may refuse to comply with a request for rectification if the request is manifestly unfounded or excessive, taking into account whether the request is repetitive in nature.

If Hornbill considers that a request is manifestly unfounded or excessive Hornbill may:

- request a "reasonable fee" to deal with the request; or
- refuse to deal with the request.

In either case Hornbill will justify our decision to you.

Hornbill will base the reasonable fee on the administrative costs of complying with the request. If Hornbill decides to charge a fee Hornbill will contact you without undue delay and within one month. Hornbill will not comply with the request until we have received the fee.

If Hornbill refuses to comply with a request for rectification we will inform you without undue delay and within one month of receipt of the request about:

- the reasons we are not taking action;
- your right to make a complaint to the ICO or another supervisory authority; and
- your ability to seek to enforce this right through a judicial remedy.

Hornbill will also provide this information if you request a reasonable fee or need additional information to identify the individual.

A request to rectify Personal Data does not need to mention the phrase 'request for rectification' or Article 16 of the GDPR to be a valid request. As long as you have challenged the accuracy of your data and have asked Hornbill to correct it or has asked that Hornbill take steps to complete data held about you that is incomplete, this will be a valid request under Article 16 of GDPR.

This presents a challenge as any of our employees could receive a valid verbal request. Hornbill has a legal responsibility to identify that you have made a request to us and handle it accordingly. Hornbill will consider which of our staff who regularly interact with individuals may need specific training to identify a request.

Hornbill will record details of the requests we receive, particularly those made by telephone or in person. Hornbill will check with you that we have understood your request, as this can help avoid later disputes about how we have interpreted the request. Hornbill will keep a log of verbal requests.

Hornbill may extend the time to respond by a further two months if the request is complex or Hornbill have received a number of requests from you. Hornbill will let you know without undue delay and within one month of receiving your request and explain why the extension is necessary.

The circumstances in which Hornbill can extend the time to respond can include further consideration of the accuracy of disputed data - although Hornbill will only do this in complex cases - and the result may be that at the end of the extended time period Hornbill expects to inform you that Hornbill considers the data in question to be accurate.

If Hornbill has doubts about the identity of the person making the request Hornbill will ask for more information. Hornbill will only request information that is necessary to confirm who you are. The key to this is proportionality. Hornbill will take into account what data it holds, the nature of the data, and what we are using it for.

Hornbill will let you know without undue delay and within one month that we need more information from you to confirm your identity. Hornbill will not comply with the request until we have received the additional information.

If Hornbill has disclosed the Personal Data to others, Hornbill will contact each recipient and inform them of the rectification or completion of the Personal Data - unless this proves impossible or involves disproportionate effort. If you ask us to, Hornbill will also inform you about these recipients.

RIGHT TO ERASURE

Under Article 17 of the GDPR YOU have the right to have Personal Data erased. This is also known as the 'right to be forgotten'. The right is not absolute and only applies in certain circumstances.

You have the right to have your Personal Data erased if:

- the Personal Data is no longer necessary for the purpose which Hornbill originally collected or processed it for;
- Hornbill are relying on consent as our lawful basis for holding the data and you withdraw your consent;
- Hornbill are relying on legitimate interests as our basis for Processing, you object to the Processing of your data, and there is no overriding legitimate interest to continue this Processing;
- Hornbill are Processing the Personal Data for direct marketing purposes and you object to that Processing;
- Hornbill have processed the Personal Data unlawfully (ie in breach of the lawfulness requirement of the 1st principle);
- Hornbill have to erase the Personal Data to comply with a legal obligation; or
- Hornbill have processed the Personal Data to offer information society services to a child.

Hornbill will tell other organisations about the erasure of Personal Data where:

- the Personal Data has been disclosed to others; or
- the Personal Data has been made public in an online environment (for example on social networks, forums or websites).

If Hornbill has disclosed the Personal Data to others, Hornbill will contact each recipient and inform them of the erasure, unless this proves impossible or involves disproportionate effort. If asked to by you, Hornbill will also inform you about these recipients.

Where Personal Data has been made public in an online environment Hornbill will take reasonable steps to inform other controllers who are Processing the Personal Data to erase links to, copies or replication of that data. When deciding what steps are reasonable Hornbill will take into account available technology and the cost of implementation.

The right to erasure does not apply if Processing is necessary for one of the following reasons:

- to exercise the right of freedom of expression and information;
- to comply with a legal obligation;
- for the performance of a task carried out in the public interest or in the exercise of official authority;
- for archiving purposes in the public interest, scientific research historical research or statistical purposes where erasure is likely to render impossible or seriously impair the achievement of that Processing; or
- for the establishment, exercise or defence of legal claims.

The GDPR also specifies two circumstances where the right to erasure will not apply to special category data:

- if the Processing is necessary for public health purposes in the public interest (eg protecting against serious cross-border threats to health, or ensuring high standards of quality and safety of health care and of medicinal products or medical devices); or
- if the Processing is necessary for the purposes of preventative or occupational medicine (eg where the Processing is necessary for the working capacity of an employee; for medical diagnosis; for the provision of health or social care; or for the management of health or social care systems or services). This only applies where the data is being processed by or under the responsibility of a professional subject to a legal obligation of professional secrecy (eg a health professional)

Hornbill may refuse to comply with a request for erasure if it is manifestly unfounded or excessive, taking into account whether the request is repetitive in nature. If Hornbill considers that a request is manifestly unfounded or excessive we may:

- request a "reasonable fee" to deal with the request; or
- refuse to deal with the request.

In either case Hornbill will justify our decision to you.

Hornbill will base the reasonable fee on the administrative costs of complying with the request. If Hornbill decides to charge a fee we will contact you promptly and inform you. Hornbill will not comply with the request until we have received the fee.

If Hornbill refuses to comply with a request for erasure we will inform you without undue delay and within one month of receipt of the request. We will inform you about:

- the reasons Hornbill are not taking action;
- your right to make a complaint to the ICO or another supervisory authority; and
- your ability to seek to enforce this right through a judicial remedy.

Hornbill will also provide this information if they request a reasonable fee or need additional information to identify you.

A request does not have to include the phrase 'request for erasure' or Article 17 of the GDPR, as long as one of the conditions listed above apply. This presents a challenge as any of Hornbill's employees could receive a valid verbal request. Hornbill have a legal responsibility to identify that you have made a request to Hornbill and handle it accordingly. Hornbill will consider which of your staff who regularly interact with individuals may need specific training to identify a request.

Hornbill will record details of the requests it receives, particularly those made by telephone or in person. Hornbill will check with the requester that it has understood their request, as this can help avoid later disputes about how Hornbill have interpreted the request. Hornbill will keep a log of verbal requests.

Hornbill will act upon the request without undue delay and at the latest within one month of receipt.

Hornbill may extend the time to respond by a further two months if the request is complex or Hornbill have received a number of requests from you. Hornbill will let you know without undue delay and within one month of receiving your request and explain why the extension is necessary.

If Hornbill has doubts about the identity of the person making the request Hornbill can ask you for more information. Hornbill will only request information that is necessary to confirm who you are. The key to this is proportionality. Hornbill will take into account what data it holds, the nature of the data, and what Hornbill is using it for.

Hornbill will let you know without undue delay and within one month that it needs more information from you to confirm your identity. Hornbill will comply with the request until it have received the additional information.

RIGHT TO RESTRICT PROCESSING

Article 18 of the GDPR gives you the right to restrict the Processing of your Personal Data in certain circumstances. This means that you can limit the way that Hornbill uses your data. This is an alternative to requesting the erasure of your data.

You have the right to restrict the Processing of your Personal Data where you have a particular reason for wanting the restriction. This may be because you have issues with the content of the information

Hornbill holds or how Hornbill has processed your data. In most cases Hornbill will not restrict Processing of your Personal Data indefinitely, but Hornbill will need to have the restriction in place for a certain period of time.

You have the right to request Hornbill restrict the Processing of your Personal Data in the following circumstances:

- you contest the accuracy of your Personal Data and Hornbill are verifying the accuracy of the data;
- the data has been unlawfully processed (i.e. in breach of the lawfulness requirement of the first principle of the GDPR) and you oppose erasure and requests restriction instead;
- Hornbill no longer need the Personal Data but you need Hornbill to keep it in order to establish, exercise or defend a legal claim; or
- You have objected to you Processing your data under Article 21(1), and Hornbill are considering whether its legitimate grounds override yours.

Hornbill will automatically restrict the Processing whilst it is considering the Personal Data's accuracy or the legitimate grounds for Processing the Personal Data in question.

Hornbill may use a number of different methods to restrict data, such as:

- temporarily moving the data to another Processing system
- making the data unavailable to users
- temporarily removing published data from a website.

Hornbill will consider how it stores Personal Data that it no longer need to process but you have requested Hornbill restrict (effectively requesting that Hornbill does not erase the data).

Hornbill will use such technical measures as necessary to ensure that any further Processing cannot take place and that the data cannot be changed whilst the restriction is in place. Hornbill will also note on our systems that the Processing of this data has been restricted.

Hornbill will not process the restricted data in any way except to store it unless:

- Hornbill has your consent;
- it is for the establishment, exercise or defence of legal claims;
- it is for the protection of the rights of another person (natural or legal); or
- it is for reasons of important public interest.

If Hornbill have disclosed the Personal Data in question to others, Hornbill will contact each recipient and inform them of the restriction of the Personal Data - unless this proves impossible or involves disproportionate effort. If asked to by you, Hornbill also inform you about these recipients.

When the restriction is on the grounds that:

- you have disputed the accuracy of the Personal Data and Hornbill are investigating this; or
- you have objected to Hornbill Processing your data on the basis that it is necessary for the performance of a task carried out in the public interest or the purposes of Hornbill's legitimate interests, and Hornbill are considering whether our legitimate grounds override yours.

Once Hornbill has made a decision on the accuracy of the data, or whether your legitimate grounds override yours, Hornbill may decide to lift the restriction. If Hornbill does this, Hornbill will inform you before it lifts the restriction.

If Hornbill are informing you that Hornbill are lifting the restriction (on the grounds that you are satisfied that the data is accurate, or that your legitimate grounds override theirs) Hornbill will also inform you of the reasons for its refusal to act upon your rights under Articles 16 or 21. Hornbill will also inform you of your right to make a complaint to the ICO or another supervisory authority; and your ability to seek a judicial remedy.

Hornbill may refuse to comply with a request for restriction if the request is manifestly unfounded or excessive, taking into account whether the request is repetitive in nature. If Hornbill consider that a request is manifestly unfounded or excessive it may:

- request a "reasonable fee" to deal with the request; or
- refuse to deal with the request.

In either case Hornbill will justify its decision to you.

Hornbill will base the reasonable fee on the administrative costs of complying with the request. If Hornbill decides to charge a fee Hornbill will contact you promptly and inform you. Hornbill will not comply with the request until Hornbill has received the fee.

If Hornbill refuses to comply with a request for restriction it will inform you without undue delay and within one month of receipt of the request. Hornbill will inform you about:

- the reasons Hornbill is not taking action;
- your right to make a complaint to the ICO or another supervisory authority; and
- your ability to seek to enforce this right through a judicial remedy.

Hornbill will also provide this information if Hornbill requests a reasonable fee or need additional information to identify you.

A request does not have to include the phrase 'request for restriction' or Article 18 of the GDPR, as long as one of the conditions listed above apply.

This presents a challenge as any of our employees could receive a valid verbal request. Hornbill has a legal responsibility to identify that you have made a request to Hornbill and handle it accordingly. Hornbill will consider which of our staff who regularly interact with individuals may need specific training to identify a request.

Hornbill will record details of the requests it receives, particularly those made by telephone or in person. Hornbill will check with you that it has understood your request, as this can help avoid later disputes about how Hornbill have interpreted the request. Hornbill will keep a log of verbal requests.

Hornbill will act upon the request without undue delay and at the latest within one month of receipt.

Hornbill may extend the time to respond by a further two months if the request is complex or Hornbill have received a number of requests from you. Hornbill will let you know within one month of receiving your request and explain why the extension is necessary.

If Hornbill have doubts about the identity of the person making the request Hornbill may ask for more information. Hornbill will only request information that is necessary to confirm who you are. The key to this is proportionality. Hornbill will take into account what data it holds, the nature of the data, and what Hornbill are using it for.

Hornbill will let you know without undue delay and within one month that it needs more information from you to confirm your identity. Hornbill will not comply with the request until it has received the additional information.

RIGHT TO DATA PORTABILITY

The right to data portability allows you to obtain and reuse your Personal Data for your own purposes across different services. It is intended to allow you to move, copy or transfer Personal Data easily from one IT environment to another in a safe and secure way, without hindrance to usability.

The right to data portability only applies:

- to Personal Data you have provided us;
- where the Processing is based on your consent or for the performance of a contract; and
- when Processing is carried out by automated means

Hornbill will provide the Personal Data in a structured, commonly used and machine-readable form. Open formats include CSV files. Machine readable means that the information is structured so that software can extract specific elements of the data. This enables other organisations to use the data.

The information will be provided free of charge.

If you request it, Hornbill may be required to transmit the data directly to another organisation if this is technically feasible. Hornbill will not be required adopt or maintain Processing systems that are technically compatible with other organisations.

If the Personal Data concerns more than one individual, Hornbill will consider whether providing the information would prejudice the rights of any other individual.

Hornbill will respond without undue delay, and within one month.

This can be extended by two months where the request is complex or Hornbill has received a number of requests from you. Hornbill will inform you within one month of the receipt of the request and explain why the extension is necessary.

Where Hornbill is not taking action in response to a request, Hornbill will explain why to you, informing you of your right to complain to the supervisory authority and to a judicial remedy without undue delay and at the latest within one month.

RIGHT TO OBJECT

You have the right to object to:

- Processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- direct marketing (including profiling); and
- Processing for purposes of scientific/historical research and statistics.

If you raise an objection to the Processing of your Personal Data by Hornbill then Hornbill will stop Processing the data unless:

- Hornbill can demonstrate compelling legitimate grounds for the Processing, which override your interests, rights and freedoms; or
- the Processing is for the establishment, exercise or defence of legal claims.

Hornbill will inform you of your right to object at the point of first communication. This will be explicitly brought to the attention of the Data Subject and shall be presented clearly and separately from any other information.

Hornbill will stop Processing Personal Data for direct marketing purposes as soon as it receives an objection. There are no exemptions or grounds to refuse.

Hornbill will deal with an objection to Processing for direct marketing at any time and free of charge.

RIGHTS RELATED TO AUTOMATED DECISION MAKING AND PROFILING

Hornbill does not carry out any automated decision making or profiling.

PROTECTIVE MEASURES

The Board of Directors and senior management of Hornbill are committed to preserving the confidentiality, integrity and availability of Personal Data processed by the company. To that end Hornbill takes the following protective measures:

1. Personal data is only accessible to those authorised to access it and all employees, sub-contractors, project consultants and any other external parties are made aware of their responsibilities to preserve information security, to report security breaches, and to act in accordance with security policies whilst doing so. The consequences of security policy violations are described in Hornbill's disciplinary processes contained within the HR policy. All staff receive information security awareness training and specialist employees will receive appropriately focused training as required to meet Hornbill's business, contractual, and regulatory requirements and obligations.
2. Hornbill is committed to compliance with all national and, where appropriate, international laws relating to the protection of Personal Data and individual privacy (including GDPR); this policy applies to all Personal Data processed by Hornbill. Hornbill continuously reviews and audits operations and security arrangements to ensure Personal Data is processed appropriately by authorised Hornbill personnel.
3. Hornbill maintains rigorous policies in respect to mobile security and requires mobile devices (laptops, mobile computers, PDAs, mobile phones, USB sticks and other similar memory devices) to have: (i) password protection, (ii) where appropriate/possible and to be encrypted, (iii) the most recent operating system and application security-related patches, fixes and updates installed. Hornbill also requires notebook computers are physically protected against theft and damage while in transit, in storage or in use and that, in cases of loss or theft this is reported immediately. Furthermore, Hornbill ensures users are appropriately trained, understand and can carry out their agreed security obligations.
4. Hornbill undertakes vetting of all Hornbill personnel in line with BS7858:2012
5. Hornbill personnel, with access to Personal Data, are provided with and sign a contract of employment which includes a confidentiality agreement covering the various responsibilities and actions required of signatories to avoid unauthorized information disclosure, the permitted use of the information, the signatories' rights in respect of that information and the required actions on termination of the agreement.
6. Hornbill will monitor for, analyse and respond to information security incidents immediately they are seen or experienced and report all such incidents to the Information Security Manager who will be responsible for undertaking an assessment and categorising the reported incident in a timely manner and in accordance with Hornbill's documented operating procedures.
7. Hornbill will report to you any; access to, alteration, disclosure of, accidental or unlawful destruction, or loss to your Personal Data (a "Breach"). An initial report will be made to you. As Hornbill investigates or otherwise becomes aware of further information, and unless restricted by any applicable Law, Hornbill will provide all further information pertaining to the nature and impact of the Breach.

PERSONAL DATA

Hornbill currently act as a Controller of Personal Data for the following distinct groups:

1. Customer's employees or subcontractors' Personal Data

2. Suppliers employees or subcontractors' Personal Data
3. Potential customers employees or subcontractors' Personal Data
4. Individuals who interact with our website

Each of these distinct groups is considered in more detail in the following schedules.

Hornbill prospective employees', current employees' and ex employee's Personal Data is dealt with in a separate privacy policy document.

SCHEDULE 1

CUSTOMERS EMPLOYEES OR SUBCONTRACTORS**What is the purpose for which the data has been collected?**

Hornbill holds Personal Data for the employee's or subcontractors of its customers to enable to it to deliver its products and services to the customer as set out in its contract with that customer. These products and services include amongst others:

1. Provision of Software as a Service
2. Product updates
3. Delivery of support services
4. Delivery of professional services and training
5. Invoicing and credit control
6. License key generation
7. Keeping customers informed about Hornbill and its products and services

What is the lawful basis on which we process the data?

Personal data is held to enable Hornbill to fulfil its contractual obligations to the customer.

What categories of data are obtained and how do we ensure that only data that is needed for the purpose is collected?

We will only hold basic personal information including:

- Name
- Email address
- Telephone number(s)
- Postal address
- Job title
- Authority – e.g. is the individual authorised to bind the customer

Hornbill does not hold any special category data or criminal offence data.

Who are the recipients of the data?

Other than sharing the data with other Hornbill group companies the data is not passed on to any third parties.

Which countries will we transfer the data to?

Hornbill processes the data inside the EEA and the United Kingdom and in other countries where we have employees. If the data originates from another country outside of the EEA and United Kingdom we will process the data in the EEA, the United Kingdom and in the originating country but we will not process the data in any other country except countries where we have employees. Our employees are subject to strict data protection controls.

Where did we get the data from?

The data will be provided to us by the customer.

How do we ensure that the data is kept accurate and up to date?

Hornbill communicates regularly with its customers and as soon as any inaccuracies in the data come to light the data is updated.

How do we ensure that inaccuracies are corrected?

The nature of the data is such that it is used in our daily interactions with the customer so if there are any inaccuracies if they are not corrected it will quickly be picked up and dealt with.

How do we ensure that data that is no longer required for the purpose for which it is collected is deleted?

Customer records are kept for 6 years after the customer's contract is terminated and the records are then destroyed.

How do we ensure that the data is secure?

The Protective Measures outlined above are applied to ensure data is secure

SUPPLIERS EMPLOYEES OR SUBCONTRACTORS**What is the purpose for which the data has been collected?**

Hornbill holds Personal Data for the employee's or subcontractors of its suppliers to enable to it to order and pay for products and services from those suppliers as set out in its contract with each supplier.

What is the lawful basis on which we process the data?

Personal data is held to enable Hornbill to fulfil its contractual obligations to the supplier.

What categories of data are obtained and how do we ensure that only data that is needed for the purpose is collected?

We will only hold basic personal information including:

- Name
- Email address
- Telephone number(s)
- Postal address
- Job title

Hornbill does not hold any special category data or criminal offence data in respect of its suppliers.

Who are the recipients of the data?

Other than sharing the data with other Hornbill group companies the data is not passed on to any third parties.

Which countries will we transfer the data to?

Hornbill processes the data inside the EEA and the United Kingdom and in other countries where we have employees. If the data originates from another country outside of the EEA and United Kingdom we will process the data in the EEA, the United Kingdom and in the originating country but we will not process the data in any other country except countries where we have employees. Our employees are subject to strict data protection controls.

Where did we get the data from?

The data will be provided to us by the supplier.

How do we ensure that the data is kept accurate and up to date?

Hornbill communicates regularly with its suppliers and as soon as any inaccuracies in the data come to light the data is updated.

How do we ensure that inaccuracies are corrected?

The nature of the data is such that it is used in our daily interactions with the supplier so if there are any inaccuracies if they are not corrected it will quickly be picked up and dealt with.

How do we ensure that data that is no longer required for the purpose for which it is collected is deleted?

Supplier records are kept for 6 years after the supplier's contract is terminated and the records are then destroyed.

How do we ensure that the data is secure?

The Protective Measures outlined above are applied to ensure data is secure

POTENTIAL CUSTOMERS EMPLOYEES OR SUBCONTRACTORS**What is the purpose for which the data has been collected?**

Hornbill holds Personal Data for the employee's or subcontractors of its potential customers to enable to it to deliver the necessary pre-sales information and services to the potential customer.

What is the lawful basis on which we process the data?

Personal data is held on the basis of Hornbill's legitimate interests.

What categories of data are obtained and how do we ensure that only data that is needed for the purpose is collected?

We will only hold basic personal information including:

- Name
- Email address
- Telephone number(s)
- Postal address
- Job title / signing authority

Hornbill does not hold any special category data or criminal offence data in respect of its suppliers.

Who are the recipients of the data?

The data is shared with other Hornbill group companies and may also be shared with Hornbill channel partners and other third parties as relevant in the commercial sales process.

Which countries will we transfer the data to?

Hornbill processes the data inside the EEA and the United Kingdom and in other countries where we have employees. If the data originates from another country outside of the EEA and United Kingdom we will process the data in the EEA, the United Kingdom and in the originating country but we will not process the data in any other country except countries where we have employees. Our employees are subject to strict data protection controls.

Where did we get the data from?

The data is (1) collated directly from industry and Hornbill events, where the potential customer has shared their personal information by 'opting-in' for their information to be used for the purpose of receiving marketing or sales information. (2) acquired via GDPR compliant data providers which identify intent at an organisational and individual level to ensure any surfaced information complies with GDPR legitimate interest.

How do we ensure that the data is kept accurate and up to date?

Hornbill communicates regularly with its potential customers and as soon as any inaccuracies in the data come to light the data is updated.

How do we ensure that inaccuracies are corrected?

The nature of the data is such that it is used in our regular interactions with the potential customer so if there are any inaccuracies if they are not corrected it will quickly be picked up and dealt with.

How do we ensure that data that is no longer required for the purpose for which it is collected is deleted?

Potential customer records are kept for 12 months after the sales engagement has come to an end. If the potential customer requests the data will be deleted sooner.

If the potential customer becomes a customer, the records are kept until 6 years as detailed in Schedule 1 above.

How do we ensure that the data is secure?

The Protective Measures outlined above are applied to ensure data is secure

SCHEDULE 4

INDIVIDUALS WHO INTERACT WITH OUR WEBSITE

What is the purpose for which the data has been collected?

Hornbill holds Personal Data for the individuals who interact with our website to enable the effective delivery of relevant information and to personalize the experience when interacting with our website.

Hornbill also collects domain information as part of its analysis of the use of our website. This data allows us to become more familiar with which customers or companies visit our site, how often they visit, and what parts of the site they visit most often. Hornbill uses this information to help improve its web-based offerings. This information is collected automatically and requires no action on your part.

What is the lawful basis on which we process the data?

Personal data is held on the basis of Hornbill's legitimate interests.

What categories of data are obtained and how do we ensure that only data that is needed for the purpose is collected?

We will only hold basic personal information including:

- Name
- Email address
- IP address / Domain Information
- Telephone number(s)
- Postal address
- Job title / signing authority

Hornbill does not hold any special category data or criminal offence data in respect of its suppliers.

Who are the recipients of the data?

We process Personal Data in the EEA, the United Kingdom and other countries where we have employees. We share this data where relevant with other Hornbill Group Companies.

Hornbill may share your anonymised Personal Data with contracted service providers so that these service providers can provide services on Hornbill's behalf, such as analytics and search engine providers that assist us in the improvement and optimization of our websites, online behavioural advertising, email services, and software support services.

Online Behavioural Advertising

Hornbill uses anonymous cookies to track information on your browsing history on hornbill.com, and third-party advertising networks (ADROLL) use the information to serve ads to you on Hornbill's behalf on other sites throughout the Internet. These cookies do not contain personally identifiable information, nor are they linked to any Personal Information collected by Hornbill.

You may opt-out of third-party advertising networks by using the Network Advertising Initiative's (NAI's) multi-cookie opt-out mechanism at: http://www.networkadvertising.org/managing/opt_out.asp. These opt-outs are valid only for the computer and browser combination used to opt-out. Clearing cookies will remove these opt-outs since they stored in cookies.

If you opt-out of an NAI third-party advertising network, you will no longer receive ads based on your browsing history from that network. You may, however, continue to receive generalized online advertising.

However, should you demonstrate an interest in one or more of our products, we may pass your details to one of our officially-appointed partners or resellers. Our partner/reseller agreements ensure that your information is treated confidentially and will not be used to solicit unwanted marketing materials. If you receive unwanted marketing materials from any of our partners or resellers as a result of providing us with your personal information, please let them know that you wish to be removed from their contact list immediately.

Which countries will we transfer the data to?

Hornbill processes the data inside the EEA and the United Kingdom and in other countries where we have employees. If the data originates from another country outside of the EEA and United Kingdom we will process the data in the EEA, the United Kingdom and in the originating country but we will not process the data in any other country except countries where we have employees. Our employees are subject to strict data protection controls.

Where did we get the data from?

The data will be primarily be provided to us by the individual.

Domain information will be collected automatically based on your IP address.

Some pages on our website site use "cookies", which are small files that the site places on your hard drive for identification purposes. These files are used for site and download registration and customization for the next time you visit us. You should note that cookies cannot read data off your hard drive. Your Web browser may allow you to be notified when you are receiving a cookie, giving you the choice to accept it or not. By not accepting cookies, some pages may not function properly and you may not be able to access certain information on this site.

How do we ensure that the data is kept accurate and up to date?

Hornbill relies on the individual to accurately enter the data.

How do we ensure that inaccuracies are corrected?

If an individual advises us there is an error in their data we will immediately correct it.

How do we ensure that data that is no longer required for the purpose for which it is collected is deleted?

Data is deleted once the purpose for which it was collected is finished.

How do we ensure that the data is secure?

The Protective Measures outlined above are applied to ensure data is secure.