

Privacy Notice – Applicable Business Services

This Privacy Notice will inform you about the information we process, about you whilst you utilise business services provided by Applicable, and in some respects, after you cease using those services. In delivery of our business services information, at times we serve as the data controller and at times as data processors. By law, we are required to provide you with information about us, about why and how we use your data, and about the rights you have over your data.

Who are we?

We are Applicable Ltd (Applicable), a company registered in England and Wales (Company No. 03426111 whose registered office is at 3rd Floor 28-28 Hammersmith Grove London W6 7HA. Our main office of operation is 3120-3130 Great Western Court, Bristol, BS34 8HP. You can contact us by post FAO Data Protection Officer at the above address or by email at dpo@applicable.com.

Following the UK's exit from the European Union, as of the 1st January 2021 we are required to provide a Data Protection Representative within the EEA allowing data subjects to raise matters directly to this representative for the purposes of the EU GDPR. Applicable have appointed DataRep to undertake this role on our behalf and they can be contacted by email at applicable@datarep.com or at the postal address locations at the end of this Notice. Please note that when mailing enquiries, it is essential that you mark your letters for attention of 'DataRep' and not Applicable Ltd, but please refer clearly within your correspondence to Applicable Ltd.

How do we use your personal data?

As part of utilising business systems

Applicable provide hosted and cloud business services e.g. Skype for Business, Microsoft Teams etc. through channels to end user organisations. Within your role at such organisations, you may utilise the online IT systems provided. The utilisation of such systems results in information of the usage being captured and recorded in the system history and related logs. This information is held for our legitimate interests around business contract delivery, quality of service delivery and legitimate interests around subjects such as cyber-security and crime prevention.

Information relating to security logs with Applicable's Security Incident and Event Management (SIEM) solution involves storage on Applicable servers currently located within secured third party datacentres within the UK, USA, Singapore, and Australia. A third-party supplier aids in the review and reporting on these logs and as these services are provided from the USA and India. These activities constitute an international transfer. The hosting locations and review supplier are appropriately contracted including data protection elements, have necessary Technical and Organisational Measures in place to meet the GDPR (EU and/or UK) / Data Protection Act 2018 requirements for their service.

Circumstances for quality of service or incident resolution could also result in log information being shared with a supplier for achieving resolution. In such instances the

supplier will have been GDPR (EU and/or UK) validated and the country from which the support will be provided will be also be validated as being within the UK or Europe (EEA), an approved country for data privacy protection or additional evidence provided that necessary GDPR required technical and organisational measures are in place for the information to be shared.

All information is held in line with Applicable's Retention Policy.

We do not use the information gathered to make any automated decisions that might affect you.

Your rights over your information

By law, you can ask us what information we hold about you, request to have access to it, and you can ask us to correct it if it is inaccurate.

In those cases where we process your information for contractual reasons, you can ask us to give you a copy of the information.

If you believe we are not using your information lawfully, you can ask us to stop using it for a period of time. In some circumstances, you may have the right to ask us to erase your personal data.

We apply the same high level of data privacy and rights to all employees in all our countries of operation.

To submit a request by email or post, please use the contact information provided in this Notice.

Your right to complain

If you have a complaint about our use of your information, we would prefer if you raise it with us in the first instance as this would provide us the opportunity to put it right. Should you need to escalate a complaint you should:

In the UK, as escalation you can contact the Information Commissioner's Office via their website at www.ico.org.uk/concerns or write to them at:

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

In the EU, as escalation you can contact the Autoriteit Persoonsgegevens (formerly known as the College Bescherming Persoonsgegevens) via their website at <https://autoriteitpersoonsgegevens.nl/en> or write to them at:

Autoriteit Persoonsgegevens
PO Box 93374
2509 AJ Den Haag
The Netherlands

DataRep Contact Addresses

Country	Address
Austria	DataRep, City Tower, Brückenkopfgasse 1/6. Stock, Graz, 8020, Austria
Belgium	DataRep, Place de L'Université 16, Louvain-La-Neuve, Waals Brabant, 1348, Belgium
Bulgaria	DataRep, 132 Mimi Balkanska Str., Sofia, 1540, Bulgaria
Croatia	DataRep, Ground & 9th Floor, Hoto Tower, Savska cesta 32, Zagreb, 10000, Croatia
Cyprus	DataRep, Victory House, 205 Archbishop Makarios Avenue, Limassol, 3030, Cyprus
Czech Republic	DataRep, IQ Ostrava Ground floor, 28. října 3346/91, Ostrava-mesto, Moravska, Ostrava, Czech Republic
Denmark	DataRep, Lautruphøj 1-3, Ballerup, 2750, Denmark
Estonia	DataRep, 2 nd Floor, Tornimäe 5, Tallinn, 10145, Estonia
Finland	DataRep, Luna House, 5.krs, Mannerheimintie 12 B, Helsinki, 00100, Finland
France	DataRep, 72 rue de Lessard, Rouen, 76100, France
Germany	DataRep, 3rd and 4th floor, Altmarkt 10 B/D, Dresden, 01067, Germany
Greece	DataRep, 24 Lagoumitzi str, Athens, 17671, Greece
Hungary	DataRep, President Centre, Kálmán Imre utca 1, Budapest, 1054, Hungary
Iceland	DataRep, Kalkofnsvegur 2, 101 Reykjavík, Iceland
Ireland	DataRep, The Cube, Monahan Road, Cork, T12 H1XY, Republic of Ireland
Italy	DataRep, BPM 335368, Via Roma 12, 10073 , Ciriè TO, Italy
Latvia	DataRep, 4th & 5th floors, 14 Terbatas Street, Riga, LV-1011, Latvia
Liechtenstein	DataRep, City Tower, Brückenkopfgasse 1/6. Stock, Graz, 8020, Austria
Lithuania	DataRep, 44A Gedimino Avenue, 01110 Vilnius, Lithuania
Luxembourg	DataRep, BPM 335368, Banzelt 4 A, 6921, Roodt-sur-Syre, Luxembourg
Malta	DataRep, Tower Business Centre, 2nd floor, Tower Street, Swatar, BKR4013, Malta
Netherlands	DataRep, Cuserstraat 93, Floor 2 and 3, Amsterdam, 1081 CN, Netherlands
Norway	DataRep, C.J. Hambros Plass 2c, Oslo, 0164, Norway
Poland	DataRep, Budynek Fronton ul Kamienna 21, Krakow, 31-403, Poland
Portugal	DataRep, Torre de Monsanto, Rua Afonso Praça 30, 7th floor, Algès, Lisbon, 1495-061, Portugal
Romania	DataRep, 15 Piața Charles de Gaulle, nr. 1-T, București, Sectorul 1, 011857, Romania
Slovakia	DataRep, Apollo Business Centre II, Block E / 9th floor, 4D Prievozska, Bratislava, 821 09, Slovakia
Slovenia	DataRep, Trg. Republike 3, Floor 3, Ljubljana, 1000, Slovenia
Spain	DataRep, BPM 335368, Avd. Castilla La Mancha N° 70-1 (Nave A), 45270, Mocejon-Toledo, Spain
Sweden	DataRep, S:t Johannesgatan 2, 4th floor, Malmo, SE - 211 46, Sweden