

Saberr Ltd

Privacy policy

Effective: 12 June 2017

1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors, our customers and the users of our services, including both our Base and CoachBot services; in this policy we explain how we will treat your personal information.
- 1.2 By using our website or services and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

2. Collecting personal information

- 2.1 We may collect, store and use the following kinds of personal information:
 - (a) information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths);
 - (b) information that you provide to us when registering with our website (including your name and email address);
 - (c) information that you provide to us when using the services on our website, or that is generated in the course of the use of those services (including questionnaire answers and comments, and information about the timing, frequency and pattern of service use);
 - (d) information contained in or relating to any communication that you send to us or send through our website (including the communication content and metadata associated with the communication); and
 - (e) any other personal information that you choose to send to us.
- 2.2 Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy.

3. Using personal information

- 3.1 Personal information submitted to us through our website will be used for the purposes specified in this policy or on the relevant pages of the website.
- 3.2 We may use your personal information to:
 - (a) administer our website and business;
 - (b) enable your use of the services available on our website;
 - (c) analyse your questionnaire responses and create reports for you, your

team and for your employer based upon those responses;

- (d) send statements, invoices and payment reminders to you, and collect payments from you;
- (e) send you non-marketing commercial communications;
- (f) send you marketing communications relating to our business or the businesses of carefully-selected third parties which we think may be of interest to you, by post or, where you have specifically agreed to this, by email or similar technology (you can inform us at any time if you no longer require marketing communications);
- (g) provide third parties with statistical information about our users (but those third parties will not be able to identify any individual user from that information);
- (h) deal with enquiries and complaints made by or about you relating to our website;
- (i) keep our website secure and prevent fraud; and
- (j) verify compliance with the terms and conditions governing the use of our website.

3.3 If you use our services, we may use anonymised data based on personal information that you provide to us for the purposes of research and analysis.

4. Disclosing personal information

4.1 We may disclose your personal information to any of our employees, officers, insurers or professional advisers insofar as reasonably necessary for the purposes set out in this policy.

4.2 If you complete a questionnaire in the course of using our services, we will not usually disclose your questionnaire responses to your employer (or to any third party). We may disclose any additional comments that you make to your employer. We will also disclose reports based on those responses. Although such reports are anonymised, it may in a particular case be possible for a person to identify you through the report.

4.3 Personal information that we collect is stored on our web servers. We use cloud-based web services provided by Amazon Web Services and Google Cloud Platform.

4.4 Our services may be integrated with third party services. Details of such integrations are set out on our website from time to time. If you choose to enable the integration of your account on our website with any third party service, then that may entail the supply of personal information to the third party services provider. By enabling any such integration, you agree to the the supply of that personal information to the relevant third party. Such third parties will act as data controllers in their own right in respect of any personal data supplied in this way.

- 4.5 We may disclose your personal information:
- (a) to the extent that we are required to do so by law;
 - (b) in connection with any ongoing or prospective legal proceedings;
 - (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
 - (d) to the purchaser of any business or asset that we are selling; and
 - (e) to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.
- 4.6 Except as provided in this policy, we will not provide your personal information to third parties.

5. International data transfers

- 5.1 Information that we collect may be stored and processed in and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this policy.
- 5.2 Our principal web servers are located within the European Economic Area. However, information that we collect may be transferred to our service providers in the United States of America and Serbia. We will only make such transfers where there is an adequate level of protection for your personal information.
- 5.3 You expressly agree to the transfers of personal information described in this Section 5.

6. Retaining personal information

- 6.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal information.
- 6.2 Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 6.3 Without prejudice to Section 6.2, if you delete your account on our website, then shortly thereafter we will cease to store your information on our live web servers. We retain back-ups of our live database for a period of up to 1 year, after which they are permanently erased.
- 6.4 Notwithstanding the other provisions of this Section 6, we will retain documents (including electronic documents) containing personal data:
- (a) to the extent that we are required to do so by law;
 - (b) if we believe that the documents may be relevant to any ongoing or

prospective legal proceedings; and

- (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

7. Security of personal information

- 7.1 We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.
- 7.2 We will store all the personal information you provide on our secure (password- and firewall-protected) servers.
- 7.3 Information sent to our web server from your browser, or from your browser to our web server, will be protected by encryption technology.
- 7.4 You are responsible for keeping the password you use for accessing our website confidential; we will not ask you for your password (except when you log in to our website).

8. Amendments

- 8.1 We may update this policy from time to time by publishing a new version on our website.

9. Your rights

- 9.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:
 - (a) the payment of a fee (currently fixed at GBP 10); and
 - (b) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).
- 9.2 We may withhold personal information that you request to the extent permitted by law.
- 9.3 You may instruct us at any time not to process your personal information for marketing purposes.

10. Third party websites

- 10.1 Our website includes hyperlinks to, and details of, third party websites.
- 10.2 We have no control over, and are not responsible for, the privacy policies and practices of third parties.

11. Updating information

- 11.1 Please let us know if the personal information that we hold about you needs to be corrected or updated.

12. About cookies

- 12.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 12.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

13. Our cookies

- 13.1 We use both session and persistent cookies on our website.
- 13.2 We use a set of cookies to provide you with our service. These cookies include crsftoken, gsScrollPos, init-email- *, full-name- *, token-*, user-hash- *. They help us to:
- (a) authenticate you (to be able to identify you as a user after logging in);
 - (b) ensure security of the service (so no-one can abuse authentication and impersonate you);
 - (c) customise the user interface (such as to show your name without having to talk to our servers, or to show different content depending on type of user you are and your preferences); and
 - (d) help us load balance the use of our servers.
- 13.3 We also use the following third party cookies on the website:
- (a) we use intercom-session to enable our customer support widget; and
 - (b) we use optimizelySegments, optimizelyBuckets and optimizelyEndUserId to help with the testing of our website and services.

14. Analytics cookies

- 14.1 We use Google Analytics, Segment, Heap and HotJar to analyse the use of our website and services.
- 14.2 Our analytics service providers generate statistical and other information about website use by means of cookies.
- 14.3 The analytics cookies used by our website have the following names: _ga (Google Analytics), _gat, (Google Analytics),ajs_anonymous_id (Segment),ajs_user_id (Segment),ajs_group_id (Segment),_hp2_ses_props (Heap),_hp2_id (Heap),_hjIncludedInSample (HotJar),_hjDoneTestersWidgets (HotJar).
- 14.4 The information generated relating to our website is used to create reports

about the use of our website and our services.

14.5 Our analytics service providers' privacy policies are available at:

<https://www.google.com/policies/privacy/> (Google Analytics),
<https://segment.com/docs/legal/privacy/> (Segment),
<https://heapanalytics.com/privacy> (Heap) and
<https://www.hotjar.com/privacy> (HotJar).

15. Blocking cookies

15.1 Most browsers allow you to refuse to accept cookies; for example:

- (a) in Firefox (version 51) you can block all cookies by clicking "Tools", "Options", "Privacy", selecting "Use custom settings for history" from the drop-down menu, and unticking "Accept cookies from sites"; and
- (b) in Chrome (version 55), you can block all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Content settings", and then selecting "Block sites from setting any data" under the "Cookies" heading.

15.2 Blocking all cookies will have a negative impact upon the usability of many websites.

15.3 If you block cookies, you will not be able to use all the features on our website.

16. Deleting cookies

16.1 You can delete cookies already stored on your computer; for example:

- (a) in Firefox (version 51), you can delete cookies by clicking "Tools", "Options" and "Privacy", then selecting "Use custom settings for history" from the drop-down menu, clicking "Show Cookies", and then clicking "Remove All Cookies"; and
- (b) in Chrome (version 55), you can delete all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Clear browsing data", and then selecting "Cookies and other site and plug-in data" before clicking "Clear browsing data".

16.2 Deleting cookies will have a negative impact on the usability of many websites.

17. Data protection registration

17.1 We are registered as a data controller with the UK Information Commissioner's Office.

17.2 Our data protection registration number is ZA171042.

18. Our details

18.1 This website is owned and operated by Saberr Limited.

18.2 We are registered in England and Wales under registration number 08388093, and our registered office is at C/o Seedcamp, Google Campus, 5 Bonhill Street, London, EC2A 4BX.

18.3 Our principal place of business is at 20 East Rd, London N1 6AD.

18.4 You can contact us:

- (a) by post, using the business address given above;
- (b) using our website contact form;
- (c) by telephone, on the contact number published on our website from time to time; or
- (d) by email, using the email address published on our website from time to time.