

Worldr Technologies Limited Privacy Policy

1. About this Privacy Policy

Worldr Technologies Limited, a company registered in England with company number 12295525 (“**Worldr**”, “**we**”, “**our**” or “**us**”) is the ‘data controller’ of the personal data described below. Our address is: 346a Farnham Road, Slough, United Kingdom, SL2 1BT.

This Privacy Policy explains why and how we process your personal data, whether you are:

- a visitor to our website (<https://worldr.com>) or our social media pages;
- part of an account management / IT support team at an organisation we sell our products and services to (including where we communicate with you by email or telephone). This organisation (“**your organisation**”) could be your employer or other organisation or entity with whom you are connected, who has purchased an enterprise licence to deploy Worldr’s technologies; or
- (in very limited circumstances) an end user of Worldr application software such as our Worldr Core Messenger or Worldr for MS Teams (“**App**”) subject to the applicable Worldr App End User License Agreement (“**EULA**”) <https://worldr.com/tnc.pdf>.

In this Privacy Policy, “**you**” refers to any individual whose personal data we process in accordance with the General Data Protection Regulation, as implemented in the United Kingdom where Worldr is established (the “**GDPR**”).

Please note that, if you are an end user of the App, we do not host any software or data (including personal information) for and on behalf of your organisation. This means that every time you send a message, make a call, or share a file with Worldr or with Worldr for MS Teams enabled, this data never leaves your own organisation’s firewall or hosting environment (as applicable). As such, the personal data we have access to and may process about you is very limited, and you will need to contact your organisation if you want to access copies of messages, etc.

This Privacy Policy was last updated in January 2022. We reserve the right to update this Privacy Policy from time to time. Any updates will be published at <https://worldr.com/pp.pdf>

2. Personal data we may collect and the purposes for which we use that data

Information you provide to us – you may provide us with personal data, if you are an existing or potential account manager / IT team member within your organisation, when you sign up to join our waiting list (<https://worldr.com/products>) or otherwise contact us (sales@worldr.com) to enquire about our products and services. This data may include your name, contact details (email address and telephone number) and information about your organisation.

We use this information to communicate with you about our products and to provide our services to your organisation, as is necessary for the performance of our contract with your organisation and on the basis of our legitimate interest in promoting our business (via our

website and social media pages and, occasionally, via direct marketing to your organisation, e.g. where we send you the Worldr newsletter about new product features, etc. by email).

Information we collect automatically – we may collect data about your device (including your IP address) when you visit our website, and use this to facilitate your interactions with our website or our social media pages, as is necessary for our legitimate interest in providing a fully functioning website.

We may also collect technical information about the devices you use to run the App, in accordance with the EULA. Please note that we never collect personal data about end users through the App and we have no access to messages, calls or files exchanged when the App is in use.

Information from your organisation – we may also receive information about you from your organisation, if they have identified you to us as their member of staff for App licensing purposes, or as part of a report to us made for troubleshooting purposes, etc. We do not require, and we will not ask your organisation for, any personal data about end users but they may provide us with certain of your details, e.g. for App licensing and support purposes. Please note that we will process that personal data on your organisation's behalf as a 'data processor' and your organisation remains responsible for your privacy in any such scenario.

3. When we may share your personal data with others

We may share your personal data to third parties in the following circumstances:

- our employees, contractors and/or professional advisers, for the purpose of connecting you to the right members of staff who can help you with enquiries about our products and services, to improve those products and services, to obtain advice from our professional advisers, or if this is necessary to enforce any applicable terms and conditions or agreements for our products and services;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation (for example, if required to do so by a court order or for the purposes of prevention of fraud or other crime – but again noting that we do not have access to any messages, calls or files shared using our software, including the App); and
- we may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation.

If we do share your personal data with a third party, we will take steps to ensure that your privacy rights are protected in accordance with this Privacy Policy.

4. How we keep your personal data secure (including if it is transferred outside the UK / EEA)

We do not collect or host any personal data in connection with the App; it is for your organisation to arrange for this and they may choose where to store that data on servers owned or controlled by them.

In relation to the limited personal data for which we are a data controller (regarding website visitors, account managers and IT staff within your organisation), we host the majority of such data on secure servers located in the UK / EEA where personal data is protected by robust data protection laws, including the GDPR. We take all appropriate technical and organisational measures to ensure the effective and secure processing of your personal data.

Where we use third parties to process personal data on our behalf, we will ensure that there are appropriate agreements in place to provide the same data security standards that we have at Worldr. You can find out more about the protection given to your personal data [(including when it is transferred outside the UK / EEA)] by contacting us using the contact details below.

5. How long we keep your personal data

Our current data retention policy is to delete or destroy (to the extent we are able to) personal data after the following periods:

- Records relating to a contract with us – seven years from either the end of our contract with your organisation or the date you last used our products or placed an order with us; and
- Marketing and sales contact records – four years from the date of your last interaction with us, if your organisation has not proceeded to purchase our products or services.

For any category of personal data not specifically defined in this Privacy Policy, and unless otherwise specified by applicable law, we will typically retain that information for at least six years from the date of our receipt of it. The retention periods stated in this notice can be prolonged or shortened as may be required (for example, where archived copies of records are required for legal, tax or regulatory purposes).

6. Your privacy rights

With respect to your personal data for which we are the data controller, the GDPR gives you rights to:

- request access to, and copies of, the personal data that we hold about you;
- require us to correct the personal data we hold about you if it is incorrect;
- require us to erase your personal data, in certain circumstances;
- require us to restrict our data processing activities, in certain circumstances;
- where our processing is based on your consent, you may withdraw that consent;
- where our processing is carried out by automated means, to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you (including for the purpose of you transmitting that personal data to another data controller); and
- to object, on grounds relating to your particular situation, to any of our processing activities where you feel this has a disproportionate impact on your rights.

Please note that these rights are not absolute and we may be entitled or required to refuse requests where exceptions apply. If you wish to exercise any of these rights, please contact us using the contact details below.

If you are not satisfied with how we are processing your personal data, you can make a complaint to a data protection supervisory authority in the EU / UK, including the data protection regulator in the EU / UK country where your organisation is based. For the UK, this is the Information Commissioner's Office ("ICO"). The ICO's contact details can be found on their website at: <https://ico.org.uk/>.

7. Contact us

If you would like to contact us with your views about our privacy practices, or with any enquiry or complaint relating to your personal information or how it is processed by Worldr, you can do so using the details below:

- Email: info@worldr.com
- Post: 346a Farnham Road, Slough, United Kingdom, SL2 1BT