



## PRIVACY POLICY STUDENTS & TEACHERS - ENGAGE

- We do not collect or store personal information for unregistered students and teachers.
- Newline Engage does not require students to register or login. No personal details are required to use the service.
- Students of any age can use the service without registration.
- Teachers with students under the age of 16 if you need students to register with Newline Engage, please read our Regulation (EU) 2016/679 (General Data Protection Regulation) compliance notice below.
- While joining a class, students enter a name to help teachers identify them. Aliases or nicknames can be used.
- No information is disclosed or sold to third parties.
- No cookies are used to track and no tracking-based promotions or advertisements are displayed.
- Online analytics services are used to gauge site performance and user behavior anonymously.
- Newline Engage is hosted within the European Union. A more detailed privacy statement is included below.
- Regulation (EU) 2016/679 (General Data Protection Regulation) Compliance

Last Updated: Jan 01 2023

Newline Engage does not collect any personal information if used without registration. GDPR mandated parental consent is required only if teachers or institutions require their students to register.

This policy is in accordance with the Regulation (E.U.) 2016/679, General Data Protection Regulation ("GDPR") and outlines our practices world-wide regarding the personal information of all students under 14 13. For more information about GDPR and general tips about protecting children's online privacy, please visit OnGuard Online.

Children consent and legal guardians authorization.

With regard to school-based activities, GDPR admits the validity of the consent given by minors provided they are at least 16 , exclusively. For any other purposes, parents or legal guardians consent will be necessary for the collection of personal information from children. Schools should always notify parents about these activities. Newline Engage requires schools, districts, or teachers to obtain parental consent. Newline Engage requests students for an email address, or google user id, or Facebook user id to register. This information is collected for controlling access to Newline Engage services.

If you are accessing Newline Engage on behalf of a Class, School or District, the following provisions also apply:

- You represent and warrant that you are solely responsible for complying with the GDPR requirements to secure parental consent for accessing applications which require personal information from children under 16.
- You may need to obtain verifiable parental consent ("Consent") from all parents whose children will be accessing Newline Engage and provide a copy to us upon our request.
- When obtaining such consent, you undertake to provide parents with a copy of our Privacy Policy.

## E.U. member States Compliance

- Member States Policy: GDPR allows member States to set a lower age to accept as valid, the consent given by minors in absence of a further authorization by the minor parents or legal guardians. If your residence is localized in any of the countries detailed below, please be aware that any mentions to the age of 16 made in this document, must be substituted by the following age limits:
  - France and Greece: 15 years
  - Spain: 14 years
  - Denmark, Portugal, Sweden and UK (disregarding its abandonment of the UE): 13 years.

Please be aware that any duties and obligations required from you according to this document, will also be claimable from you with respect to the aforementioned limits.

**Ownership of Student Records:** Any and all Student Records provided to Newline Engage, or to which Newline Engage has been granted access, are and shall remain the sole property of the School District or local educational agency (collectively, "School District") that provided or granted access to such records.

**Student-Generated Content:** Pupil content can be downloaded by the LEA and pupils. The system may remove pupil content for service efficiency reasons and to abide by the requirement for removal of data when no longer needed to provide service.

Pupils and LEA will be unable to download removed content. Date for content removal is advertised to the pupil and LEA. Pupils can move pupil generated content by downloading from LEA-provided accounts and uploading to a personal account.

**Third Party Access and Use:** Newline Engage prevents third parties working directly or contracted with us from accessing or utilizing any student record under Newline Engage's control (internal network). Newline Engage does not use any information in a student record for any purpose other than those required or specifically permitted by the Newline Engage Terms and Conditions and Privacy Policy Statement.

**Parent and Student Review Procedures:** Newline Engage allows pupils and parents to request review of the information stored by Newline Engage by sending a request to [support@newline-interactive.com](mailto:support@newline-interactive.com).

**Security and Confidentiality of Student Records:** Newline Engage stores student login records in a secure database in the cloud with encryption at rest and for in-flight data. Access to the records is limited only to employees needing access to run the service.

**Unauthorized Disclosure:** In the unlikely event any Student login records are inadvertently compromised via an outside data breach or for any other reason, Newline Engage shall notify the School District that owns such records immediately upon the discovery of such inadvertent disclosure. The School District may in turn notify affected parents, legal guardians, or eligible students as the School District deems appropriate.

**Post-Contract Data Deletion:** Any and all Student Records provided to Newline Engage, or to which Newline Engage has been granted access, are and shall remain the sole property of the School District or local educational agency (collectively, "School District") that provided or granted access to such records. Schools have the right to review, have deleted and/or refuse to permit further collection or use of the student's information upon request.

Newline Engage hereby certifies that, upon the termination of a service contract with a School District, it shall isolate and permanently delete any and all Student login records belonging to such School District that may remain on the System, unless the School District or applicable regulations require the retention of such data, in which case the records shall be deleted upon the expiration of the retention period.

**GDPR and member States Compliance:** Newline Engage offers School Districts interfacing with Newline Engage Systems the means to comply with their obligations under the GDPR and member States regulations, by enabling Authorized Users to inspect and review Pupil Records and to correct any inaccuracies therein as described in Section 4 of this Statement.

**Prohibition Against Targeted Advertising:** Newline Engage will never use any student identifiable information in direct targeted advertising for any product or service. Furthermore, Newline Engage does not sell, trade, or rent any element of personally identifiable information to any third party.

## **PRIVACY NOTICE**

**Last updated January 1, 2023**

Thank you for choosing to be part of our community at Epiphani Inc ("Company", "we", "us", or "our"). We are committed to protecting your personal information and your right to privacy.

If you have any questions or concerns about this privacy notice, or our practices with regards to your personal information, please contact us at [support@newline-interactive.com](mailto:support@newline-interactive.com).

When you visit our website <https://newline-engage.com> (the "Website"), and more generally, use any of our services (the "Services", which include the Website), we appreciate that you are trusting us with your personal information. We take your privacy very seriously. In this privacy notice, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy notice that you do not agree with, please discontinue use of our Services immediately.

This privacy notice applies to all information collected through our Services (which, as described above, includes our Website), as well as any related services, sales, marketing or events.

Please read this privacy notice carefully as it will help you understand what we do with the information that we collect.

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### **1. WHAT INFORMATION DO WE COLLECT?**

#### **Personal information you disclose to**

We collect personal information that you voluntarily provide to us when you register on the Website, express an interest in obtaining information about us or our products and Services, when you participate in activities on the Website.

The personal information that we collect depends on the context of your interactions with us and the Website, the choices you make and the products and features you use. The personal information we collect may include the following:

**Personal Information Provided by You.** We do not collect or store personal information for unregistered students and teachers. For registered users, we collect their names and email addresses.

**Social Media Login Data.** We may provide you with the option to register with us using your existing social media account details, Facebook, and Google. If you choose to register in this way, we will collect the information described in the section called "[HOW DO WE HANDLE YOUR SOCIAL LOGINS](#)" below.

When you create a paid account with Newline Engage, or initiate a financial transaction, we will use a third-party payment processor to process the payment. We do not collect your credit card number, expiration date, or pin number. We only retain subscribed plan information. The third-party payment processor retains payment information. Please note that we do not control and are not responsible for personal information collected by third party payment processor. We strongly recommend that you review their privacy policy at the time of check-out. You may review their [privacy policy](#) and [terms of service](#) here as well.

## **2. HOW DO WE USE YOUR INFORMATION?**

We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.

We use personal information collected via our Website for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- To facilitate account creation and logon process. If you choose to link your account with us to a third-party account (such as your Google or Facebook account), we use the information you allowed us to collect from those third parties to facilitate account creation and logon process for the performance of the contract. See the section below headed "[HOW DO WE HANDLE YOUR SOCIAL LOGINS](#)" for further information.
- To manage user accounts. We may use your information for the purposes of managing our account and keeping it in working order.

### **3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?**

Newline Engage prevents third parties working directly or contracted with us from accessing or utilizing any student record under Newline Engage's control (internal network). Newline Engage does not use any information in a student record for any purpose other than to comply with laws, to provide you with services, to protect your rights, or to fulfill business obligations.

We may process or share your data that we hold based on the following legal basis:

**Consent:** We may process your data if you have given us specific consent to use your personal information for a specific purpose.

**Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

### **4. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?**

No cookies are used to track and no tracking-based promotions or advertisements are displayed.

### **5. HOW DO WE HANDLE YOUR SOCIAL LOGINS?**

If you choose to register or log in to our services using a social media account, we may have access to certain information about you.

Our Website offers you the ability to register and login using your third-party social media account details (like your Microsoft or Google logins). Where you choose to do this, we will receive certain profile information about you from your social media provider. The profile information we receive include your name, and email address.

We will use the information we receive only for the purposes that are described in this privacy notice or that are otherwise made clear to you on the relevant Website. Please note that we do not control, and are not responsible for, other uses of your personal information by your third-party social media provider. We recommend that you review their privacy notice to understand how they collect, use and share your personal information, and how you can set your privacy preferences on their sites and apps.

## **6. HOW LONG DO WE KEEP YOUR INFORMATION?**

We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **7. HOW DO WE KEEP YOUR INFORMATION SAFE?**

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. Although we will do our best to protect your personal information, transmission of personal information to and from our Website is at your own risk. You should only access the Website within a secure environment.

- Newline Engage stores student login records in a secure database in the cloud with encryption at rest and for in-flight data. Access to the records is limited only to employees needing access to run the service.

## **8. HOW WILL WE NOTIFY OF A BREACH?**

Notification of Breach and Unauthorized Release

- Notify of any breach of security resulting in an unauthorized release of student data or teacher or principal data, in the most expedient way possible and without unreasonable delay but no more than seven (7) calendar days after we have discovered or been informed of the breach or unauthorized release. (Users will be notified at their registered email addresses).



- We will provide as much information as possible about the incident, including but not limited to: a description of the incident, the date of the incident, the date we discovered or was informed of the incident, a description of the types of protected data involved, an estimate of the number of records affected, what we have done or plan to do to investigate the incident, stop the breach and mitigate any further unauthorized access or release of Protected Data, and contact information for our representatives who can assist affected individuals that may have additional questions.

Please refer to our detailed [Data Breach Policy](#).

## 9. WHAT ARE YOUR PRIVACY RIGHTS?

You may review, change, or terminate your account at any time.

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm).

If you are resident in Switzerland, the contact details for the data protection authorities are available here: <https://www.edoeb.admin.ch/edoeb/en/home.html>.

If you have questions or comments about your privacy rights, you may email us at [support@newline-interactive.com](mailto:support@newline-interactive.com).

### Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Contact us using the contact information provided.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with applicable legal requirements.

**Opting out of email marketing:** You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list – however, we may still communicate with you, for example to send you service-related emails that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes. To otherwise opt-out, you may:

- Access your account settings and update your preferences.
- Contact us using the contact information provided.

## 10. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

## 11. SPECIFIC PRIVACY RIGHTS

### What categories of personal information do we collect?

We have collected the following categories of personal information in the past twelve (12) months:

Category	Examples	Collected
A. Identifiers	Contact details, such as name, email address	YES
B. Personal information categories	Name, contact information, education, employment, employment history and financial information	YES (Name and Email only)
C. Protected classification characteristics	Gender and date of birth	NO
D. Commercial information	Transaction information, purchase history, financial details and payment information	NO
E. Biometric information	Fingerprints and voiceprints	NO

F. Internet or other similar network activity	Browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems and advertisements	NO
G. Geolocation data	Device location	NO
H. Audio, electronic, visual, thermal, olfactory, or similar information	Images and audio, video or call recordings created in connection with our business activities	NO
I. Professional or employment-related information	Business contact details in order to provide you our services at a business level, job title as well as work history and professional qualifications if you apply for a job with us	NO
J. Education Information	Student records and directory information	NO
K. Inferences drawn from other personal information	Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics	NO

We may also collect other personal information outside of these categories in instances where you interact with us in-person, online, or by phone or mail in the context of:

- Receiving help through our customer support channels
- Participation in customer surveys or contests; and
- Facilitation in the delivery of our Services and to respond to your inquiries.

#### **How do we use and share your personal information?**

More information about our data collection and sharing practices can be found in this privacy notice.

You may contact us by email at [support@newline-interactive.com](mailto:support@newline-interactive.com), or by referring to the contact details at the bottom of this document.

If you are using an authorized agent to exercise your right to opt-out, we may deny a request if the authorized agent does not submit proof that they have been validly authorized to act on your behalf.

#### **Will your information be shared with anyone else?**

We may use your personal information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be "selling" of your personal data.

Epiphani Inc has not disclosed or sold any personal information to third parties for a business or commercial purpose in the preceding twelve (12) months. Epiphani Inc will not sell personal information in the future belonging to website visitors, users and other consumers.

## **Your rights with respect to your personal data**

### Right to request deletion of the data - Request to delete

You can ask for the deletion of your personal information. If you ask us to delete your personal information, we will respect your request and delete your personal information, subject to certain exceptions provided by law, such as (but not limited to) the exercise by another consumer of his or her right to free speech, our compliance requirements resulting from a legal obligation or any processing that may be required to protect against illegal activities.

### Right to be informed - Request to know

Depending on the circumstances, you have a right to know:

- whether we collect and use your personal information;
- the categories of personal information that we collect;
- the purposes for which the collected personal information is used;
- whether we sell your personal information to third parties;
- the categories of personal information that we sold or disclosed for a business purpose;
- the categories of third parties to whom the personal information was sold or disclosed for a business purpose; and
- the business or commercial purpose for collecting or selling personal information.

In accordance with applicable law, we are not obligated to provide or delete consumer information that is de-identified in response to a consumer request or to re-identify individual data to verify a consumer request.

### Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights

We will not discriminate against you if you exercise your privacy rights.

### Verification process

Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. These verification efforts require us to ask you to provide information so that we can match it with the information you have previously provided us. For instance, depending on the type of request you submit, we may ask you to provide certain information so that we can match the information you provide with the information we already have on file, or we may contact you through a communication method (e.g. phone or email) that you have previously provided to us. We may also use other verification methods as the circumstances dictate.

We will only use personal information provided in your request to verify your identity or authority to make the request. To the extent possible, we will avoid requesting additional information from you for the purposes of verification. If, however, if we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity, and for security or fraud-prevention purposes. We will delete such additionally provided information as soon as we finish verifying you.

### Other privacy rights

- you may object to the processing of your personal data
- you may request correction of your personal data if it is incorrect or no longer relevant, or ask to restrict the processing of the data
- you may request to opt-out from future selling of your personal information to third parties. Upon receiving a request to opt-out, we will act upon the request as soon as feasibly possible, but no later than 15 days from the date of the request submission.

To exercise these rights, you can contact us by email at [support@newline-interactive.com](mailto:support@newline-interactive.com), or by referring to the contact details at the bottom of this document. If you have a complaint about how we handle your data, we would like to hear from you.

## **12. DO WE MAKE UPDATES TO THIS NOTICE?**

Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

### **13. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?**

If you have questions or comments about this notice, you may contact our Data Protection Officer (DPO), by email at [support@newline-interactive.com](mailto:support@newline-interactive.com), or by post to:

Newline Interactive Europe  
Ronda de Poniente 2, 1B  
28760, Tres Cantos, Madrid  
Spain

### **HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?**

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information, please visit: [support@newline-interactive.com](mailto:support@newline-interactive.com). We will respond to your request within 30 days.

## **DATA BREACH POLICY**

### **What Is a Personal Data Breach?**

Data breaches may be caused by the following (but not limited to)

- Human error includes unauthorized access or disclosure of sensitive information to wrong recipients.
- Malicious causes include hacking incidents / Illegal access to cloud services where personal data is stored.
- Computer System Error causes include errors or bugs in Newline Engage and/or failure of cloud services, cloud computing or cloud storage security / authentication / authorization systems.

### **Responding to a Data Breach**

Upon being notified of a (suspected or confirmed) data breach, the Data Breach Team should immediately activate the data breach & response plan.

Newline Engage's data breach management and response plan are:

1. Confirm the Breach
2. Contain the Breach
3. Assess Risks and Impact
4. Report the Incident
5. Evaluate the Response & Recovery to Prevent Future Breaches

## 1. Confirm the Breach

The Data Breach Team (DBT) should act as soon as it is aware of a data breach. Where possible, it should first confirm that the data breach has occurred. It may make sense for the DBT to proceed Contain the Breach on the basis of an unconfirmed reported data breach, depending on the likelihood of the severity of risk.

## 2. Contain the Breach

The DBT should consider the following measures to Contain the Breach, where applicable:

- Establish whether steps can be taken to limit any damage caused by the breach.
- Prevent further unauthorized access to the system.
- Reset passwords if accounts and / or passwords have been compromised.
- Isolate the causes of the data breach in the system, and where applicable, change the access rights to the compromised system and remove external connections to the system.

## 3. Assess Risks and Impact

Knowing the risks and impact of data breaches will help determine whether there could be serious consequences to affected individuals, as well as the steps necessary to notify the individuals affected.

## 4. Reporting Breaches

All members of staff have an obligation to report actual or potential data protection compliance failures. This allows us to:

- Investigate the failure and take remedial steps if necessary.
- Maintain a register of compliance failures.
- Notify the school districts of any compliance failures that are material either in their own right or as part of a pattern of failures.

support@newline-interactive.com will notify any affected school districts without undue delay after becoming aware of a personal data breach.

We will provide as much information as possible about the incident, including but not limited to

## 5. Preventing Future Breaches

Once the data breach has been dealt with, Newline Engage will consider its security processes with the aim of preventing further breaches. In order to do this, we will:

- Establish what security measures were in place when the breach occurred Assess whether technical or organisational measures can be implemented to prevent the breach happening again.
- Consider whether there is adequate staff awareness of security issues and look to fill any gaps through training or tailored advice.
- Consider whether its necessary to conduct a privacy or data protection impact assessment.
- Consider whether further audits or data protection steps need to be taken to update the data breach register.

### **Continuous Monitoring**

We will monitor the effectiveness of this and all of our policies and procedures and conduct a full review and update as appropriate. Our monitoring and review will include looking at how our policies and procedures are working in practice to reduce the risks posed to our users.



# Privacy Policy – CAST +

This Privacy Policy covers the use of Newline Cast + of Newline Interactive Inc. Use of Newline Cast + and all materials made available by Newline (including, without limitation the Tutorial provided with the Software) are subject to the terms and conditions of this Privacy Policy. You must read and agree to the terms of this Privacy Policy prior to accessing or using Newline Cast +. Newline Interactive, Inc. is referred to as "Newline" and each individual is referred to as "You" (and "Your") or "User". Users may include, but are not limited to teachers, administrators, installers, consultants, and any other user provided with authorized access to Newline Cast +.

This page is used to inform users regarding our policies with the collection, use, and disclosure of Personal Information if anyone decided to use our Service.

If you choose to use our Service, then you agree to the collection and use of information in relation to this policy. The Personal Information that we collect are used for providing and improving the Service. We will not use or share your information with anyone except as described in this Privacy Policy.

The terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, unless otherwise defined in this Privacy Policy.

## Information Collection and Use

For a better experience while using our Service, we may require you to provide us with certain personally identifiable information, including but not limited to picture, audio. The information that we request is retained on your device and is not collected by us in any way.

## Log Data

We want to inform you that whenever you use our Service, in case of an error in the app we collect data and information on your phone called Log Data. This Log Data may include information such as your device's Internet Protocol ("IP") address, device name, operating system version, configuration of the app when utilizing our Service, the time and date of your use of the Service, and other statistics. The Log Data will only be recorded on your device unless you actively send it to us.

## Cookies

Cookies are files with small amount of data that is commonly used an anonymous unique identifier. These are sent to your browser from the website that you visit and are stored on your device's internal memory. This Services does not use these "cookies" explicitly. However, the app may use third party code and libraries that use "cookies" to collect information and to improve their services. You have the option to either accept or refuse these cookies and know when a cookie is being sent to your device. If you choose to refuse our cookies, you may not be able to use some portions of this Service.

**Security** We value your trust in providing us your Personal Information, thus we are striving to use commercially acceptable means of protecting it. But remember that no method of transmission over the internet, or method of electronic storage is 100% secure and reliable, and we cannot guarantee its absolute security.

**Children's Privacy** We do not knowingly collect personal identifiable information from children under 16. In the case we discover that a child under 13 has provided us with personal information, we immediately delete this from our servers. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us so that we will be able to do necessary actions.

## **Changes to This Privacy Policy**

We may update our Privacy Policy from time to time. Thus, you are advised to review this page periodically for any changes. We will notify you of any changes by posting the new Privacy Policy on this page. These changes are effective immediately, after they are posted on this page.

## **Updates**

Newline reserves the right to updates to Newline Cast + ("Updates") "over the air" or by other electronic means as deemed appropriate by Newline. Updates may install automatically or may require manual installation in which event Newline will provide you with notice and instructions necessary to install the Update. You agree to reasonably assist Newline in the manual installation of any Update. Updates may constitute a modification to the content or use experience with respect to Newline Cast + and you agree to any such modification.

# Privacy Policy – Display Note

## Background

DisplayNote Technologies Limited understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website [www.displaynote.com](http://www.displaynote.com) and uses our products or service and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Services. If you do not accept and agree with this Privacy Policy, you must stop using Our Services immediately.

## 1. Definitions and interpretation

In this Policy, the following terms shall have the following meanings:

<b>"Account"</b>	means an account required to access and/or use certain areas and features of Our Services;
<b>"Cookies"</b>	means a small text file placed on your computer or device by Our Services when you visit certain parts of Our Services and/or when you use certain features of Our Services. Details of the Cookies used by Our Services are set out in section 13, below;
<b>"Our Services"</b>	means collectively the software products, online services, and websites owned and operated by the company.
<b>"Personal Data"</b>	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Services. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation ("GDPR"); and
<b>"We/Us/Our"</b>	Means DisplayNote Technologies Limited, a limited company registered in Northern Ireland under company number NI610261, whose registered address is The Concourse 3 Building, Queens Road, Belfast, Northern Ireland, BT3 9DT, and whose main trading address is The Concourse 3 Building, Queens Road, Belfast, Northern Ireland, BT3 9DT.

## 2. Information about us

- 2.1 Our Services are owned and operated by DisplayNote Technologies Limited, a limited company registered in Northern Ireland under company number NI610261, whose registered address is The Concourse 1 Building, Queens Road, Belfast, Northern Ireland, BT3 9DT and whose main trading address is The Concourse 1 Building, Queens Road, Belfast, Northern Ireland, BT3 9DT.
- 2.2 Our VAT number is GB125654319.

### **3. What does this policy cover?**

This Privacy Policy applies only to your use of Our Services. Our Services may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

### **4. Your rights**

4.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:

- 4.1.1 The right to be informed about Our collection and use of personal data;
- 4.1.2 The right of access to the personal data We hold about you (see section 12);
- 4.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 14);
- 4.1.4 The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact us using the details in section 14);
- 4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;
- 4.1.6 The right to data portability (obtaining a copy of your personal data to reuse with another service or organization);
- 4.1.7 The right to object to Us using your personal data for particular purposes; and
- 4.1.8 Rights with respect to automated decision-making and profiling.

4.2 If you have any cause for complaint about Our use of your personal data, please contact us using the details provided in section 14 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

4.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

### **5. What data do we collect?**

Depending upon your use of Our Services, We may collect some or all of the following personal data (please also see section 13 on Our use of Cookies and similar technologies):

- 5.1 name;
- 5.2 date of birth;
- 5.3 business/company name
- 5.4 job title;
- 5.5 contact information such as email addresses and telephone numbers;
- 5.6 demographic information such as postcode, preferences, and interests;

- 5.7 financial information such as credit/debit card numbers;
- 5.8 IP address;
- 5.9 web browser type and version;
- 5.10 operating system;
- 5.11 a list of URLs starting with a referring site, your activity on Our Services, and the site you exit to;

## **6. How do we use your data?**

6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 7, below.

6.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:

6.2.1 Providing and managing your Account;

6.2.2 Providing and managing your access to Our Services;

6.2.3 Personalising and tailoring your experience with Our Services;

6.2.4 Supplying Our products and services to you (please note that We require your personal data in order to enter into a contract with you);

6.2.5 Personalising and tailoring Our products and services for you;

6.2.6 Replying to emails from you;

6.2.7 Supplying you with emails that you have opted into (you may unsubscribe or opt out at any time by clicking on the unsubscribed link within all emails or contacting [privacy@displaynote.com](mailto:privacy@displaynote.com))

6.2.8 Market research;

6.2.9 Analysing your use of Our Services to enable Us to continually improve Our Services and your user experience;

6.3 With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email, telephone, or post with information, news, and offers on Our products and services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

6.4 Third parties (including Mailchimp and HubSpot) whose content appears on Our Services may use third-party Cookies, as detailed below in section 13. Please refer to section 13 for more information on controlling Cookies. Please note that We do not control

the activities of such third parties, nor the data they collect and use, and advise you to check the privacy policies of any such third parties.

6.5 You have the right to withdraw your consent to Us using your personal data at any time and to request that We delete it.

6.6 We do not keep your personal data any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):

6.6.1 Personal data that you have submitted and opted into within a website form or marketing mailing list be retained within our marketing mailing lists held in our marketing automation platforms, Mailchimp and HubSpot. By opting into a marketing list, you acknowledge that the information you provide will be transferred to Mailchimp for processing in accordance with their Privacy Policy and Terms.

6.6.2 By downloading whitepapers and eBooks from our resources page on Our Services and opting into a marketing list, you acknowledge that the information you provide will be transferred to HubSpot for processing in accordance with their Privacy Policy and Terms.

6.6.3 If you submit a form request to be contacted by our sales team or to book a demo, your personal data will be held within Zoho.com our CRM systems. You acknowledge that the information you provide will be transferred to Zoho.com for processing in accordance with their Privacy Policy and Terms.

6.6.4 Your data will be held for a minimum of 5 years or more and will be retained unless you choose to unsubscribe from our lists. You can unsubscribe at any time by clicking on the unsubscribe button in all emails from us or sending an email to [privacy@displaynote.com](mailto:privacy@displaynote.com).

## **7. How and where do we store your data?**

- 7.1 We only keep your personal data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it.
- 7.2 Some or all of your data may be stored outside of the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). You are deemed to accept and agree to this by using Our Services and submitting information to Us. If We do store data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR.
- 7.3 Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Services.

## **8. Do we share your data?**

8.1 We may sometimes contract with third parties to supply services to you on Our behalf. These may include payment processing, delivery of goods, search engine facilities,

advertising, and marketing. In some cases, third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.

8.2 We may compile statistics about the use of Our Services including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymized and will not include any personally identifying data, or any anonymized data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.

8.3 The third-party data processors used by Us and listed below are located outside of the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). Where We transfer any personal data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR including:

8.3.1 Mailchimp – is used as our marketing automation platform. By opting into a marketing list, you acknowledge that the information you provide will be transferred to Mailchimp for processing in accordance with their Privacy Policy and Terms.

8.3.2 HubSpot – is used as our second marketing automation platform. By downloading whitepapers and eBooks from our resources page on Our Services and opting into a marketing list, you acknowledge that the information you provide will be transferred to HubSpot for processing in accordance with their Privacy Policy and Terms.

8.3.3 Zoho.com – Zoho CRM is used for our customer relationship management system. If you submit a form request to be contacted by our sales team or to book a demo, your personal data will be held within Zoho.com our CRM systems. You acknowledge that the information you provide will be transferred to Zoho.com for processing in accordance with their Privacy Policy and Terms.

8.4 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

## 9. What happens if our business changes hands?

9.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.

9.2 In the event that any of your data is to be transferred in such a manner, you will be contacted in advance and informed of the changes. When contacted you will be given the choice to have your data deleted or withheld from the new owner or controller.

## **10. How can you control your data?**

- 10.1 In addition to your rights under the GDPR, set out in section 4 when you submit personal data via Our Services, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details to [privacy@displaynote.com](mailto:privacy@displaynote.com) and by managing your Account.
- 10.2 You may also wish to sign up for one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you from receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receive.

## **11. Your right to withhold information**

- 11.1 You may access Our Services without providing any data at all. However, to use all features and functions available on Our Services you may be required to submit or allow for the collection of certain data.
- 11.2 You may restrict Our use of Cookies. For more information, see section 13.

## **12. How can you access your data?**

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable, and We will provide any and all information in response to your request free of charge. Please contact Us for more details at [privacy@displaynote.com](mailto:privacy@displaynote.com), or using the contact details below in section 14.

## **13. Our use of Cookies**

- 13.1 Our Services may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Services and to provide and improve Our products and services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data are protected and respected at all times.
- 13.2 By using Our Services you may also receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than Us. Third-party Cookies are used on Our Services for website analytics only. For more details, please refer to section 6, above, and to section 13.6 below. These Cookies are not integral to the functioning of Our Services



and your use and experience of Our Services will not be impaired by refusing consent to them.

- 13.3 All Cookies used by and on Our Services are used in accordance with current Cookie Law.
- 13.4 Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Services may not function fully or as intended.
- 13.5 The following first party Cookies may be placed on your computer or device:

Name of Cookie	Purpose	Strictly Necessary
SESS#	Preserves user's states across page requests	Yes

The following third-party Cookies may be placed on your computer or device:

Name of Cookie	Provider	Purpose
cfduid	hs-analytics.net	Used by the content network, Cloudflare, to identify trusted web traffic.
_cfduid	hs-scripts.com	Used by the content network, Cloudflare, to identify trusted web traffic.
_cfduid	Hubspot.com	Used by the content network, Cloudflare, to identify trusted web traffic.
_cfduid	Zopim.com	Used by the content network, Cloudflare, to identify trusted web traffic.
_cfduid	Zopim.io	Used by the content network, Cloudflare, to identify trusted web traffic.
Lang	Cdn.syndication.twimg.com	Remembers the user's selected language version of a website.

- 13.6 Our Services use analytics services provided by Google Analytics, HubSpot, Zopim, Pubmatic, and Casalemedia. Website analytics refers to a set of tools used to collect and analyze anonymous usage information, enabling Us to better understand how Our Services are used. This, in turn, enables Us to improve Our Services and the products and services offered through it. You do not have to allow Us to use these Cookies, however, whilst Our use of them does not pose any risk to your privacy or your safe use of Our Services, it does enable Us to continually improve Our Services, making them a better and more useful experience for you.
- 13.7 The analytics service(s) used by Our Services use(s) Cookies to gather the required information.
- 13.8 The analytics service(s) used by Our Services use(s) the following Cookies:

Name of Cookie	First / Third Party	Provider	Purpose
_ga	First	Displaynote.com	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.
_gat	First	Displaynote.com	Used by Google Analytics to throttle request rate.
_gid	First	Displaynote.com	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.
AWSALB	Third	Zopim.com	Unclassified.
_hssc	First	Displaynote.com	Collects anonymous statistical data related to the user's website visits, such as the number of visits, average time spent on the website, and what pages have been loaded. The purpose is the segment the website's users according to factors such as demographic and geographical location, in order to enable media and marketing agencies to structure and understand their target groups to enable customized online advertising.

_hssrc	First	Displaynote.com	Collects anonymous statistical data related to the user's website visits, such as the number of visits, average time spent on the website, and what pages have been loaded. The purpose is the segment the website's users according to factors such as demographic and geographical location, in order to enable media and marketing agencies to structure and understand their target groups to enable customized online advertising.
_hstc	First	Displaynote.com	Collects anonymous statistical data related to the user's website visits, such as the number of visits, average time spent on the website, and what pages have been loaded. The purpose is the segment the website's users according to factors such as demographic and geographical location, in order to enable media and marketing agencies to structure and understand their target groups to enable customized online advertising.
_ptq.gif	Third	Hubspot.com	Sends data to the marketing platform HubSpot about the visitor's device and behavior. Tracks the visitor across devices and marketing channels.
_zlcmid	First	Displaynote.com	Preserves user states across page requests.
_hjIncludedInSample	First	Displaynote.com	Determines if the user's navigation should be registered in a certain statistical placeholder.
ads/ga-audiences	Third	Google.com	Used by Google AdWords to re-engage visitors that are likely to convert to customers based on the visitor's online behavior across websites.

Ads/user-lists/#	Third	Google.com	Unclassified
AdServer/Pug	Third	Pubmatic.com	Unclassified
c	Third	Rubicanproject.com	Unclassified
CMDD	Third	Casalemedia.com	Collects anonymous data related to the user's visits to the website, such as the number of visits, average time spent on the website, and what pages have been loaded, with the purpose of displaying target ads.
CMID	Third	Casalemedia.com	Collects anonymous data related to the user's visits to the website, such as the number of visits, average time spent on the website, and what pages have been loaded, with the purpose of displaying target ads
CMPRO	Third	Casalemedia.com	Unclassified
CMPS	Third	Casalemedia.com	Collects anonymous data related to the user's visits to the website, such as the number of visits, average time spent on the website, and what pages have been loaded, with the purpose of displaying target ads.
CMRUM3	Third	Casalemedia.com	Collects anonymous data related to the user's visits to the website, such as the number of visits, average time spent on the website, and what pages have been loaded, with the purpose of displaying target ads.

CMSC	Third	Casalemedia.com	Collects anonymous data related to the user's visits to the website, such as the number of visits, average time spent on the website, and what pages have been loaded, with the purpose of displaying target ads
CMST	Third	Casalemedia.com	Collects anonymous data related to the user's visits to the website, such as the number of visits, average time spent on the website, and what pages have been loaded, with the purpose of displaying target ads

- 13.9 In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.
- 13.10 You can choose to delete Cookies on your computer or device at any time, however, you may lose any information that enables you to access Our Services more quickly and efficiently including, but not limited to, login and personalization settings.
- 13.11 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

#### **14. Contacting us**

If you have any questions about Our Services or this Privacy Policy, please contact us by email at [privacy@displaynote.com](mailto:privacy@displaynote.com), by telephone at 02890 730 480, or by post at The Concourse 3 Building, Queens Road, Belfast, Northern Ireland, BT3 9DT. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 12, above).

#### **15. Changes to our Privacy Policy**

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Services and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Services following the alterations. We recommend that you check this page regularly to keep up-to-date.