

BUILD BEACON – PRIVACY NOTICE (INCL. COOKIES)

January 2023

At Build Beacon Ltd (referred to as “**Build Beacon**”, “**we**”, “**us**” and “**our**”), we are committed to protecting the privacy of our Clients and Visitors.

This is the Privacy (and Cookies) Notice (“**Notice**”) for the website www.buildbeacon.com and our Services (“**Services**”).

This Notice explains how Build Beacon uses and protects information from which any individual can be identified, such as names, contact details and ID data (Personal Information). To the extent that any Personal Information is collected, it will be held in confidence and in accordance with the Data Protection Legislation (please refer below).

If you are in the UK or the EU, we are the data controller, unless otherwise stated.

1. Contacting us

If you have any questions, comments, and requests regarding this Notice you can get in touch with us via e-mail at info@buildbeacon.com.

2. What Personal Information do we collect & how do we use it?

This Privacy Notice will apply to you if:

- you visit and browse our website (we’ll refer to you as a “**Visitor**”)
- you order products and Services with us and use our website to generate and post content online (we’ll refer to you as a “**Client**”)
- you engage with us for any other reasons (e.g. make enquires by e-mail, website contact form, or if you form part of our supply chain)

When you engage with us (e.g. sending us e-mails) you may provide Personal Information (e.g. name, e-mail address) about yourself or others. Where you make use of our website, we may also collect information about your use of the website (e.g. your IP address and choice of web browser).

We will only use Personal Information, which is provided to us, or otherwise obtained by us, as set out in this Notice. The Data Protection Legislation requires there to be a legal basis for us to collect and use your Personal Information. We will state the legal basis in each section below as applicable.

Where you provide Personal Information on behalf of another individual, you are responsible for notifying that individual that you have provided their Personal Information to us and directing them to this Notice as to how we will process their Personal Information.

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are consent, contractual obligation, and if we have a legitimate interest. Please refer to Section 3 (Legal bases) for more information.

2.1 Automatically collected information

Each time you visit our website, whether you're just browsing, or you have an account, we will automatically collect information from you. This includes technical information, information about your visit and location data:

Technical information

Technical information may include the phone number, Internet Protocol (IP) address, login information, browser type and version, browser plug-in types and versions, device IDs, social log-in ID/email address, time zone setting, operating system and platform, hardware version, device

settings (e.g. language and time zone), file & software names and types (associated with your device and/or the Services), battery & signal strength, information relating to your mobile operator or Internet Service Provider (ISP).

Information about your visit

Information about your visit may include the full Uniform Resource Locators (URL), clickstream to, through and from our Website (including date and time), pages and services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), traceable campaign links (e.g. in emails, or via tracking URLs), and methods used to browse away from the page.

Location data

Location data includes country location (based on your full or partial IP address and/or Google Analytics information) which we use to provide location services (if you ask or permit us to), so that we can deliver content, advertising or other services that are dependent on knowing where you are, like checking for fraudulent transactions.

Location data may be collected in combination with device ID, so we can recognise your mobile browser or device when you return to the Service.

How we use automatically collected information

- To understand how individuals use our website, and how we can improve it
- To ensure that content from our website is presented in the most effective manner for you and for your devices

Legal basis

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

- We have a legitimate interest

2.2 Enquiries, complaints, troubleshooting, and technical issues

Information we collect

To process enquiries, complaints, troubleshooting, and technical issues we collect *contact* and *communications* information.

Contact information includes basic contact information you provide about yourself and other identified individuals. This includes:

- First and last name
- Company name (if applicable)
- E-mail address
- Telephone and/ or mobile number
- Business address
- Social media handle (for example, if you engage with us on social media)

Communications information includes your correspondence with us (e.g. if you contact us to obtain a quotation). This includes:

- E-mails
- Website contact form enquiries and requests
- Texts
- Social media messaging
- Calls
- Letters
- Any “in-person” conversations you have with us

How we use the information

- To contact you in response to your enquiry
- To contact you in response to an information request about our Services
- To refer an issue to the appropriate technical authority so that they can attempt to resolve the problem and/ or contact you for more information (e.g. a third party web developer about a technical query/ request)
- To handle a complaint

Legal basis

Under the General Data Protection Regulation (GDPR), the lawful basis we rely on for processing this information will be:

- We have a legitimate interest (for general enquiries, complaints, and troubleshooting [if you are not a Client])
- We have a contractual obligation (for engagement relating to placing an order with Build Beacon, or complaints and technical issues and troubleshooting [if you’re a Client])

2.3 Product and service orders

Information we collect

To process product and service orders we collect *contact* and *communications* information.

Contact information includes basic contact information you provide about yourself and other identified individuals. This includes:

- First and last name/s
- Company name/s (if applicable)
- Your role on the project
- Project name
- The project address
- E-mail address/s
- Telephone and/ or mobile number/s
- Business address
- Billing address (if different to the business address)

Communications information includes your correspondence with us (i.e. if you contact us to initiate a product and/ or service order). This includes:

- E-mails
- Texts
- Social media messaging

- Calls
- Letters
- Completed product and/ or service order forms
- Any “in-person” conversations you have with us

How we use the information

- To contact you in response to a product and/ or service order
- To contact you in response to an information request about our Services
- To setup your project account and/ or project
- To invoice you the applicable value of the product and/ or Services
- Provide you with technical and other service updates (e.g. if we update any of our agreements or will be carrying out scheduled maintenance)

Legal basis

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

- We have a contractual obligation

2.4 Client uploads to the Build Beacon platform

Information we collect

To process Client uploads we collect *contact* and *content* information.

Contact information includes information you upload about yourself and other individuals. *Contact* information may be displayed in documents you upload or uploaded directly to the relevant project page.

Content information is information that is uploaded to a project page that is not *Contact* information.

How we use the information

- We will host the project page on which the information is publicly displayed until such a time that you request removal of the information or request removal of the project page
- Provide Client support
- Send e-mail notifications to project subscribers when information is uploaded to the project page
- Perform data analytics to ensure that Clients and Visitors get the best possible experience when using the Build Beacon service and website
- To check that the content uploaded is in accordance with our User Agreement

Legal basis

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

- We have a contractual obligation

2.5 E-mail subscriptions

To process e-mail subscriptions, we collect *contact* information.

Contact information includes basic contact information you provide about yourself:

- First and last name
- E-mail address

How we use the information

- We will notify you when the project page to which you've subscribed is updated

Legal basis

- Your consent

3. Legal bases

Your consent

If you've subscribed to receive e-mail notifications about project updates, we'll use your Personal Information (name and e-mail address) to communicate with you.

You can opt-out of receiving notifications at any time by selecting "unsubscribe" at the foot of the notification e-mail.

We have a contractual obligation

We collect, store, and process your Personal Information if:

- It is necessary for performing a contract you have with us (e.g. the User Agreement) for Services we provide
- It is necessary for setting up a contract with us

We have a legitimate interest

We may process your personal information if it is necessary for our legitimate interests or the legitimate interests of a third party, provided those interests are not outweighed by your rights and interests.

Our legitimate interests include:

- Dealing with enquiries and troubleshooting
- Handling complaints about our website or Services
- Gaining your feedback and reviews
- Gaining insights into how you use our Services
- Delivering, developing, and improving our Services
- Enhancing, customising, or modifying our Services and communications
- Implementing and improving our security measures
- Growing our business and informing our marketing strategy
- Marketing and promoting our Services to a company you work for or provide Services to

4. How we share your personal information

Where it is necessary for the performance of our contract with you or for our internal business processes, we may share your Personal Information with certain third parties, such as our professional advisors, service providers, product suppliers, regulatory bodies, auditors, technology providers and any duly authorised agents or related, associated, or affiliated companies of the foregoing for the same purposes.

By submitting your Personal Information to us, you acknowledge that such third parties may receive and process your Personal Information. We ask all third parties to treat your Personal Information securely and in accordance with this Notice and will take reasonable steps to enforce this. We will never sell your data.

In addition, it may be necessary to disclose your Personal Information if we are under a duty to disclose your Personal Information in order to comply with any legal obligation (such as anti-money laundering or anti-terrorist financing obligations), carry out an internal investigation, enforce the Terms and Conditions of our website and any other agreement, or protect the rights, property, or safety of Build Beacon, our customers, directors, employees or other personnel.

In exceptional circumstances, if we are sold or merged with another company we may disclose your information to a potential buyer, including your Personal Information and other information concerning your relationship with us, so that they can continue to provide the Services you have requested.

5. How we protect your information

Our website uses secure end-to-end encryption to protect your information. All connections into our platform are secured using industry standard security and encryption.

Where you have chosen a password which allows you to access certain parts of the website, you are responsible for keeping this password confidential. We advise that you do not share your password with anyone.

Unfortunately, the transmission of information on the internet is not completely secure and, although we will take steps to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted via the website; any transmission is therefore at your own risk.

6. How we store your information

All information you provide to us is securely stored. We may transfer your personal information outside the UK/ EEA to store it, to enable us to provide our Services to you, to facilitate the operation of our business (where it is in our legitimate interests and we have concluded these are not overridden by your rights), and where we are legally required to do so.

We will put legal protections in place to safeguard personal data transfers in compliance with data protection laws. We may transfer your personal information outside the UK/ EEA, including to the key organisations listed below:

- Xero Limited (United Kingdom). Transfer Safeguard – EU adequacy.
- VistaPrint. Transfer Safeguard – EU adequacy.
- Google LLC (Google Cloud, Google Ads/ Analytics). Transfer Safeguard – [Google Cloud Standard Contractual Clauses](#), and [Google Ads Standard Contractual Clauses](#)

- Newfold Digital Inc [Bluehost] (United States). Transfer Safeguard – [Standard Contractual Clauses](#)

We update our service providers from time to time and will update this Notice accordingly.

7. How long we keep your information for

We will only keep your Personal Information for as long as we are reasonably required to do so and, in any event, only for as long as the Data Protection Legislation allows.

8. External websites

Build Beacon may, from time to time, contain links to external websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies/ notices. Build Beacon does not accept any responsibility or liability for these policies or any content on external websites and does not necessarily endorse the views expressed within them. Build Beacon has no control over the availability of any of these websites. Please check each website's policies before you submit any personal information to these websites.

9. Aggregated data

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you, and you cannot be re-identified). This anonymised data (for example, aggregated statistics) is no longer personal data, and we may keep and use this anonymised information indefinitely without further notice to you.

We use this to help us provide, develop, and improve our services, including to:

- better understand how people use our Services
- provide our Clients with information about our Services, including user statistics (e.g. total numbers, broad demographics statistics)
- develop useful insights and improvements to the Services

10. Your personal data rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your information in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal data in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at **info@buildbeacon.com** if you wish to make a request.

11. Updating this Notice

This Notice was last updated on 31st January 2023.

We may update this Notice from time to time and will post any changes on this page.

If we make substantial changes to this Notice, we will notify you through e-mail correspondence.

12. Cookie notice

Cookies are small pieces of data that are downloaded to your computer or mobile device when you visit a website or application. Cookies help us to analyse web traffic and identify which pages of our website are being used. Our website also uses cookies to respond to you as an individual so that it can tailor its operations to your needs by gathering and remembering information about your preferences. We only use this information for statistical analysis purposes and then it is removed from our systems.

A cookie does not give us access to your computer or any information about you, other than information about how you use the website and the Personal Information you choose to share with us (including Personal Information you automatically share with us by way of your browser settings).

You can manage cookie use via your browser settings (this will allow you to refuse the setting of all or some cookies) and your browser provider may ask you to confirm your settings. Note, however, that if you block all cookies (including essential cookies) via your browser settings you may not be able to access all or parts of our website.

13. Complaints

Should you have any queries or complaints in relation to how we use your Personal Information, please contact us at **info@buildbeacon.com**.

If you have any concerns, you have the right to lodge a complaint with the Information Commissioner's Office (ICO). The ICO is the supervisory authority in the UK and can provide additional information about your rights, the obligations of organisations in relation to your Personal Information, and deal with any complaints you may have. Please visit www.ico.org.uk.