

BRIDGEX TECHNOLOGY LIMITED PRIVACY NOTICE**About this Privacy Notice**

We are BridgeX Technology Limited (“BridgingX” and “BridgeX”), a company registered in England and Wales under company number 12133528 with registered address Suite 3, 4-6 High Street, Windsor, Berkshire, England, SL4 1LD. We take the privacy of your information very seriously. This notice is designed to tell you about our practices, as data controller, regarding the collection, use and disclosure of personal data which may be collected in person from you, obtained via our website, apps or collected through other means such as by an online form, email, or telephone communication.

In general, our services relate to the provision of a software-as-a-service platform to users on an enterprise basis, providing a single point of visibility and control for contractual relationships throughout their lifecycle. Please visit the [website](#) for more information on the offerings we provide.

This notice applies to personal data: 1) provided by our clients (which may include the organisation who has subscribed to our software service on an enterprise basis and for whom you work) or our prospective clients and their staff; 2) provided by you (for instance whether you are an end-user who is using the services under your employer’s subscription and have registered an account with us or you are simply visiting the BridgingX website); 3) collected directly by us through publicly available information; and 4) relating to third party suppliers of BridgingX, but this notice does not apply to information we hold in relation to our employees and staff, or in respect to personal data which we hold as “processor” (see the heading “**Important Note**” below). In this notice “**you**” refers to any individual whose personal data we hold or process.

Some features of our service include artificial intelligence or machine-learning functionality (“AI Functionality”). When enabled, AI Functionality processes text in order to generate assistive outputs such as search results, summaries or anomaly flags. AI outputs are generated for information purposes only and are not a substitute for professional advice. Inputs and outputs are processed within our contracted cloud environment. We do not use customer inputs or outputs to train general or foundation AI models.

This privacy notice follows the EU General Data Protection Regulation (the “GDPR”), the Data Protection Act 2018 and any other applicable data or privacy legislation. This notice may be updated from time to time and you should check this page regularly for any updates. Changes to this notice are effective when they are posted on this page.

Important Note: If you (whether as our client or as an end-user pursuant to a client’s subscription) are using our services to upload content to our platform and such content includes personal data, e.g. contact details for the parties to a contract, please note that relevant BridgingX user or account holder is the “controller” and we are the “processor” of such personal data. We cannot control and we are not responsible for the use made of that personal data by the relevant user or account holder. In these circumstances where we are acting as processor, our standard Data Processing Agreement (“DPA”) will govern the terms under which we collect and process the relevant personal data and is incorporated into each contract between us and you. The DPA includes details of the scope, nature and purpose of the processing of data, the duration of the processing, the types of personal data processed, the data subjects involved and those contract terms which are required by Article 28 of the GDPR.

Personal data we collect and how we process this data

Below we have set out the categories of data we collect, the legal basis we rely on to process the data and how we process the data:

- Contact and registration information of our users who: 1) have registered with us or whose details have been passed to us on behalf of their employer or organisation for whom they work (you may for example be a client who has subscribed to our services on an enterprise basis or an end-user of the

services); 2) submit an enquiry to us; or 3) subscribe to our newsletter. Contact information may include your name, surname, company name, job title/role, email address, username, address, telephone ("**Contact Information**").

If you subscribe to a newsletter or other regular information we provide, we will process your Contact Information on the basis that you have consented to this and will only send our newsletter to you for as long as you continue to consent.

Otherwise, we process this information to provide our services and communicate with you (including with respect to customer care and support) on the basis of performing our contract with you or on the basis of our legitimate interest in providing our services to you.

- Information which we hold because you are a client of ours ("**Client Information**") and which we process during the course of providing our services to you.

We process this information on the basis of the performance of our contract with you or on the basis of our legitimate interest in providing our services to you.

- A record of any correspondence or communication between you and us ("**Communication Information**").

We process this information when we monitor our relationship with you and provide services to you on the basis of the performance of our contract with you or on the basis of our legitimate interest in providing our services to you.

- Financial information which we hold in the context of providing/receiving services from you ("**Financial Information**") such as billing and banking information.

We process this information when we provide or receive services (as the case may be) on the basis of the performance of our contract with you or on the basis of our legitimate interest in providing our services to you.

- Information which we hold because you are a third party supplier relevant to the services we provide to our clients and end-users (you may for example be a professional adviser, payment processor or marketing software provider) ("**Supplier Information**").

We process this information (including contact and financial information), on the basis of the performance of our contract with you or on the basis of our legitimate interest in providing our services to you.

- **Cookie Information.** A cookie is a small text file which asks permission to be placed on your computer's hard drive or mobile device. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site.

Where applicable and necessary, we process Cookie Information on the basis that you have consented to this in order to improve or communicate with you about our services and/or to customise the website according to your personal interests. Otherwise and for other technical information (such as IP address data), we process this on the basis of our legitimate interest in providing our services to you. For more information, please see our [Cookie Policy](#).

- **Marketing information.** We may hold information about you in order to provide information about our services. This may include names, job titles, email addresses, phone numbers, addresses, and other information ("**Marketing Information**").

We process this information in order to improve our services, communicate with you about our services or for market research purposes, on the basis of our legitimate interests in communicating with you about our services or on the basis that you have consented to receiving the information.

- You may also collect and process data relating to your use of the software service and contracts and transactions managed using the software service and to aggregate and combine that data with other data we hold for the purposes of analysing the software service and providing information and reports to our subscribers. We undertake that any such information will not contain any personal data and will not relate to any identified individual and will only be provided to third parties on an aggregated, anonymised basis.

AI inputs and outputs. If AI Functionality is enabled, we process the text you submit to AI features and the resulting outputs, together with minimal technical metadata (for example timestamps and a pseudonymous user identifier) to deliver the feature, provide support and ensure security. Lawful basis: performance of our contract with the client, and our legitimate interests in providing secure and effective services. We do not use AI inputs or outputs to train general or foundation AI models.

We may collect information from you directly, from the organisation for whom you work (such as your contact information and job title/role) or from another third party. If we obtain your personal data from a third party, your privacy rights under this notice are not affected and you are still able to exercise the rights contained within this privacy notice.

Data Retention

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

- Following an enquiry with us, we will remove your Contact Information and Communication Information from our CRM system after a period of 3 years unless you subsequently subscribe to our services with us.
- In respect of records relating to a contract with us - 7 years from either the end of the contract or the date you last used our services (whichever is later).
- In respect of Cookie Information and save for any essential cookies– such data is removed after 2 years. After such period, only aggregated data (from which all personal data has been removed) is stored by us.
- In respect of Marketing Information – 3 years from the last date on which you have interacted with us.
- In respect of AI interaction logs – retained for Rights in relation to automated decision making and profiling for support and security, then deleted or irreversibly anonymised.

For any category of personal data not specifically defined in this notice, and unless otherwise specified by applicable law, the required retention period for any personal data will be deemed to be 7 years from the date of receipt by us of that data. The retention periods stated in this notice can be prolonged or shortened as may be required (for example, in the event that legal proceedings apply to the data or if there is an on-going investigation into the data).

We review the personal data (and the categories of personal data) we are holding on a regular basis to ensure the data is still relevant to our business and is accurate. If we discover that certain data we are holding is no longer necessary or accurate, we will take reasonable steps to correct or securely delete this data as may be required.

If you wish to request that data we hold about you is amended or deleted, please see below for your privacy rights.

Sharing your information

We may disclose information to third parties in the following circumstances:

- We may work with other professionals and providers in providing and delivering our services to you, such as Microsoft Azure and other service technology providers.
- If you are a user of our services, from time to time we may share certain data with our clients (i.e. the organisation for whom you work) for statistical and analytical purposes. For instance, on a broader level, we may aggregate certain data with other users' data and create analytics reports for such organisations however individuals would not be identifiable through such reports.
- In order to enforce any terms and conditions or agreements for our services that may apply.
- If we are sub-contracting services to a third party we may provide information to that third party in order to provide the relevant services.
- We may disclose information to our group companies (as the case may be).
- 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).
- 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.
- To protect our rights, property and safety, or the rights, property and safety of our users or other third parties. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- Cloud AI service providers acting as sub-processors to deliver AI Functionality. These providers are bound by contract to process personal data only on our instructions and not to use inputs or outputs to train general or foundation AI models.

If we do supply your personal data to a third party we will take steps to ensure that your privacy rights are protected and that such third party complies with the terms of this notice.

Security

We will take all reasonable steps to ensure that appropriate technical and organisational measures are carried out in order to safeguard the information we collect from you and protect against unlawful access and accidental loss or damage. These measures may include (as necessary):

- protecting our servers by both hardware and software firewalls;
- locating our data processing storage facilities in secure locations;
- encrypting all data stored on our server with an industry standard encryption method that encrypts the data between your computer and our server so that in the event of your network being insecure no data is passed in a format that could easily be deciphered;
- when necessary, disposing of or deleting your data so it is done so securely;
- regularly backing up and encrypting all data we hold.
- The same technical and organisational measures apply to AI Functionality and to any AI sub-processors we engage.

We will ensure that our employees and staff are aware of their privacy and data security obligations. We will take reasonable steps to ensure that the employees or staff of third parties working on our behalf are aware of their privacy and data security obligations.

This notice and our procedures for handling personal data will be reviewed as necessary.

Third party links

Our website may contain links to other sites that are not operated by us. This notice applies to our services only so if you click on a third-party link, we strongly advise you to review that site's privacy policy.

We have no control over and are not responsible or liable for the content, privacy policies or practices of any third-party sites or services.

Your privacy rights

With respect to your personal data, you have:

- **The right to be informed** - a right to know about our personal data protection and processing activities, details of which are contained in this notice
- **The right to access** - the right to request a copy of any personal data that we have about you
- **The right to rectification** - the right to request a correction of any errors in or update of the personal data that we have about you
- **The right to erasure** (also referred to as the '*right to be forgotten*') - the right to request that your personal data is deleted from our records
- **The right to restrict processing**- the right to request that we no longer process your personal data in certain ways, whilst not requiring us to delete the same data
- **The right to object to processing** - the right to request that your personal data will not be processed
- **The right to data portability** - the right to request that your personal data be transferred or exported to another organisation
- **The right to withdraw consent** - the right to withdraw any permission you have given us to process your personal data
- **Rights in relation to automated decision making and profiling**-
 - We do not use automated decision-making that produces legal or similarly significant effects about you. AI Functionality is assistive only and any decisions remain with users and our clients.
 - The right not to be subject to automated decision-making (including profiling) when those decisions have a legal (or similarly significant effect) on you
 - The right to request that your personal data will not be used to contact you for direct marketing purposes

All Subject Access Requests and other requests or notifications in respect of your above rights must be sent to us in writing via our [contact page](#) or by post to Data Officer, BridgeX Technology Limited, Suite 3, 4-6 High Street, Windsor, Berkshire, England, SL4 1LD.

We will endeavour to comply with such requests as soon as possible but in any event we will comply within one month of receipt (unless a longer period of time to respond is reasonable by virtue of the complexity or number of your requests).

Data breaches

If personal data we hold about you is subject to a breach or unauthorised disclosure or access, we will report this to our data protection manager or officer (if an officer has been appointed) and the Information Commissioner's Office (ICO) (as necessary).

If a breach is likely to result in a risk to your data rights and freedoms, we will notify you as soon as possible.

Transferring your information outside the EEA

We will not transfer your personal data in a systematic way outside of the European Economic Area or UK (together referred to as the “EEA”) but there may be circumstances in which certain personal data is transferred outside of the EEA, in particular:

- From time to time some of our data processors may be based outside the UK or EEA. Where this occurs we put in place appropriate safeguards for international transfers, such as the EU Standard Contractual Clauses and the UK International Data Transfer Addendum, and we require our processors to provide an adequate level of protection for personal data. A copy of the relevant safeguards is available on request.
- By way of example our server infrastructure is provided by cloud providers, including but not limited to Microsoft Azure, and is hosted in the United Kingdom by default (for example UK South and UK West). If your organisation requests hosting or processing outside the UK or EEA we will implement the appropriate transfer mechanism and notify you in advance.
- If you use our services while you are outside the EEA, your information may be transferred outside the EEA in order to provide you with our services or communicate with you.
- We may communicate with individuals or organisations outside of the EEA in providing our services. Those communications may include personal data (such as contact information).
- From time to time your information may be stored in devices which are used by our staff outside of the EEA (but staff will be subject to our cyber-security policies).

If we transfer your information outside of the EEA, and the third country or international organisation in question has not been deemed by the EU Commission to have adequate data protection laws, we will provide appropriate safeguards and we will be responsible for ensuring your privacy rights continue to be protected as outlined in this notice.

Contact us

If at any time you would like to contact us with your views about our privacy practices, or with any enquiry or complaint relating to your personal data or how it is handled, you can do so via our [contact page](#) or by post to Data Officer, BridgeX Technology Limited, Suite 3, 4-6 High Street, Windsor, Berkshire, England, SL4 1LD.

Complaints

If we are unable to resolve any issues you may have or you would like to make a further complaint, you can contact the Information Commissioner’s Office by visiting <http://www.ico.org.uk/> for further assistance.