

# InfoDesk, Inc. Privacy Policy

## General Information

InfoDesk's global privacy policy sets how we handle your personal information if you're an InfoDesk user with a mission of protecting the individual's privacy on the Internet. InfoDesk has created this Privacy Statement to demonstrate our firm commitment to the individual's right to data protection and privacy. This Privacy Statement outlines how we handle information that can be used to directly or indirectly identify an individual ("Personal Data"). It applies across all of InfoDesk's products and services.

Within this privacy policy, InfoDesk, Inc. may be referred to as 'we' or 'us' or 'our' or 'InfoDesk'.

The data controller of our products and services is InfoDesk, Inc., 660 White Plains Rd, Suite 300, Tarrytown, New York 10591, USA ("InfoDesk"). InfoDesk Group's data protection officer is Marc Epstein ([privacy@infodesk.com](mailto:privacy@infodesk.com)).

The scope of this 'policy' covers our privacy policy in regards to personal data used to run our Products and Services and nothing else. 'User terms' refers the rules for using each of the products. Consenting to our privacy policy applies to all Products and Services. Please refer to InfoDesk's public website privacy policy in regards to marketing and sales use of personal data.

## Types of Personal Information Collected

We collect certain personal information about users of our products and services. The most common types of information we collect include things like: Email Address, First Name, Last Name, IP address and any personal data sent by your employer on your behalf (department, location, etc.).

## Collection of personal information

We collect your personal information when you or your employer provide it to us during user registration to subscribe to a newsletter, email list, submit feedback, fill out a survey, or send us a communication.

## Personal information we collect about you from others

Although we generally collect personal information directly from you, on occasion, we also collect certain categories of personal information about you from other sources. In particular:

- a. your Employer, which may provide information about you when you link, connect, or login to your account with Single Sign-On (SSO) and they send us information such as

your first name, last name, email address, department, location, etc. The information varies and is controlled by your Employer

## Usage of Personal Information

We will use your personal information:

- a. To fulfil a contract, or take steps linked to a contract: in particular, in facilitating and processing transactions that take place within our Products and Services, like when you receive an email newsletter from our curated service
- b. Where this is necessary for purposes which are in our legitimate interests. These interests include:
  - I. operating the Products and Services;
  - II. providing you with services described in the Products and Services;
  - III. verifying your identity when you sign in to any of our Products or Services;
  - IV. responding to support tickets, and helping facilitate the resolution of any disputes;
  - V. updating you with operational news and information about our Products and Services e.g. to notify you about changes to our Products or Services, website disruptions or security updates;
  - VI. carrying out technical analysis to determine how to improve the Products and services we provide;
  - VII. monitoring activity of our Products and Services, e.g. to identify potential fraudulent activity and to ensure compliance with the user terms that apply to the products and services;
  - VIII. managing our relationship with you, e.g. by responding to your comments or queries submitted to us on the Products and Services or asking for your feedback or whether you want to participate in a survey;
  - IX. managing our legal and operational affairs (including, managing risks relating to content and fraud matters);
  - X. training InfoDesk staff about how to best serve our user community;
  - XI. improving our products and services.
  - XII. providing general administrative and performance functions and activities; and
- c. Where you give us consent:
  - I. reporting on your activity within our Products and Services that will be sent to your Employer; and
  - II. providing you with marketing information about products and services which we feel may interest you; and
  - III. customising our services and products, like improving the functionality (pop-up control) that appear on our Products and Services – where this involves the use of cookies or similar technologies – in order to provide a more personalised experience.
- d. For purposes which are required by law.

e. For the purpose of responding to requests by government, a court of law, or law enforcement authorities conducting an investigation.

## Disclosure of Personal Information

We may disclose personal information to the following recipients:

- a. Subcontractors and service providers - like Mailchimp ([Privacy Policy](#)) and Amazon Web Services (AWS) ([Privacy Policy](#)), to send email newsletters which have a global presence ;and
- b. authors of any items or services made available to you, so they can facilitate support and license validation, who maybe located in any of the countries our products are available in;
- c. regulators and government authorities in connection with our compliance procedures and obligations;
- d. a purchaser or prospective purchaser of all or part of our assets or our business, and their professional advisers, in connection with the purchase;
- e. a third party to meet legal requirements, including complying with court orders, valid discovery requests, valid subpoenas, and other appropriate legal requests.
- f. a third party, in order to enforce or defend our rights, or to address financial or reputational risks;
- g. a rights holder in relation to an allegation of intellectual property infringement or any other infringement; and
- h. other recipients where we are authorised or required by law to do so.

## Transfer and/or Storage of Personal Information

InfoDesk and the third-party service providers we use reside within as well as outside of the European Economic Area (the “EEA”). As a consequence, whenever InfoDesk is using or otherwise processing your Personal Data for the purposes set out in this Privacy Statement, InfoDesk may transfer your Personal Data to countries outside of the EEA including to such countries in which a statutory level of data protection applies that is not comparable to the level of data protection within the EEA. In order to protect your information, we take care where possible to work with subcontractors and service providers who we believe maintain an acceptable standard of data security compliance.

## Personal Information Security

We store personal information on secure servers that are managed by us and our service providers like AWS and Mailchimp. Personal information that we store or transmit is protected by security and access controls, including username and password authentication, two-factor authentication, and data encryption.

## Retrieval of Personal Information

You can access some of the personal information that we collect about you by logging in to your account. You also have the right to make a request to access other personal information we hold about you and to request corrections of any errors in that data. You can also close the account you have with us for any of our Products or Services at any time. To make an access or correction request, contact our data protection officer using the contact details at the end of this policy. Personal information requests may take up to 72 hours for completion.

## Marketing and Your Personal Information

Marketing Data and Customer Data are kept in entirely separate databases. We will not use, or allow anyone else to use, Customer Data to contact any individual or company for marketing purposes except as directed by that individual or company.

We will not use Contact Information for products and services for marketing purposes. If you have consented to receive marketing communications from us, we will only use the data provided to us explicitly for that purpose.

Marketing data is used only as permitted by applicable law and our Marketing and Web Site Privacy Policy, located at <http://www.infodesk.com/privacy-policy>. For more information about privacy and marketing data, consult our policy or contact us at [privacy@infodesk.com](mailto:privacy@infodesk.com)

You can ‘opt-out’ of such communications if you would prefer not to receive them in the future by using the “unsubscribe” facility provided in the communication itself.

You also have choices about cookies, as described below.

## Cookies and web analytics

For more information about how we use cookies, web beacons and similar technologies see our cookie policy [here](#).

When using our Products and Services, there’s certain information that’s recorded which is generally anonymous information and does not reveal your identity. If you’re logged into your account some of this information could be associated with your account including the following kinds of details:

- a. your IP address or proxy server IP address’
- b. the domain name you requested
- c. the name of your internet service provider is sometimes captured depending on the configuration of your ISP connection
- d. the date and time of your visit to the product and services
- e. the length of your session
- f. the pages which you have accessed
- g. the number of times you access our site within any month
- h. the file URL you look at and information relating to it
- i. the website which referred you to our Products and Services
- j. the operating system which your computer uses

## Information About Children

Our Sites are not suitable for children under the age of 16 years, if you are under 16 we ask that you do not use our Products or Services or give us your personal information.

## Links to other websites.

InfoDesk products and services may contain links to 3rd party (meaning non-InfoDesk Group companies) websites, products or services. InfoDesk is not responsible for the privacy practices or the content of websites, products or services outside InfoDesk. Therefore, we recommend that you carefully read the privacy statements of such foreign sites.

## Personal Information Retention

How long we keep information we collect about you depends on the type of information, as described in further detail below. After such time, we will delete your information. If this is not possible, then we will securely store your information and isolate it from any further use until deletion is possible.

We retain information from deleted accounts as necessary for our legitimate business interests, to comply with the law, prevent fraud, collect fees, resolve disputes, troubleshoot problems, assist with investigations, enforce the terms of service and take other actions permitted by law. The information we retain will be handled in accordance with this Privacy Policy.

When we have no ongoing legal or legitimate business need to process your Personal Information, we securely delete the information or anonymise it or, if this is not possible, then we will securely store your Personal Information and isolate it from any further processing until deletion is possible. We will delete this information from the servers at an earlier date if you so request, as described in "Your Data Rights" below.

If you provide information to our customers as part of their use of the Subscription Service, our customers decide how long to retain the personal information they collect from you. If a customer terminates its use of the Subscription Service, then we will provide customer with access to all information stored for the customer by the Subscription Service, including any Personal Information provided by you, for export by the customer according to our agreement with our customer. After termination, we may, unless legally prohibited, delete all customer information, including your Personal Information, from the Subscription Service.

Personal information removal may take up to 72 hours.

## Policy Updates

We will need to change this policy from time to time to ensure that it reflects the latest legal requirements and any changes to our privacy management practices.

When we do change the policy, we'll make sure to notify you about such changes, where required. A copy of the latest version of this policy will always be available on this page.

## European Economic Area User Rights

For the purposes of applicable EU data protection law (including the General Data Protection Regulation 2016/679 (the “**GDPR**”), we are a ‘data controller’ of your personal information.

## Your Data Rights

If we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. You may withdraw your consent by sending in a request to [privacy@infodesk.com](mailto:privacy@infodesk.com).

In some instances, we may retain some data even if you withdraw your consent. For example, where we require your personal information to comply with legal or contractual obligations, then provision of such data is mandatory: if such data is not provided, then we will not be able to manage our contractual relationship with your employer, or to meet obligations placed on us.

Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal.

You can request access, correction, updates or deletion of your personal information. You are also entitled to ask us to port your personal information that we have collected (i.e. to transfer in a structured, commonly used and machine-readable format, to you). If you request InfoDesk to delete your Personal Data, you may not be able to continue to use any InfoDesk product or service.

All requests for personal information may take up to 72 hours to process.

If you have unresolved concerns, you also have the right to complain to data protection authorities about our collection and use of your personal information. The relevant data protection authority will be the data protection authority of the country: (i) of your habitual residence; (ii) of your place of work; or (iii) in which you consider the alleged infringement has occurred. Contact details for data protection authorities in the EEA, Switzerland and certain non-European countries (including the US and Canada) are available [here](#).)

## Contact Information

If you have any questions about our privacy practices or the way in which we have been managing your personal information, please contact InfoDesk in writing at 660 White Plains Road, Tarrytown, New York 10591, attention. Data Protection Officer or [privacy@infodesk.com](mailto:privacy@infodesk.com).

Thank you for taking the time to read our privacy policy, it is important that you understand how InfoDesk uses your personal information.

**Both personal information and personal data have the same meaning in the context of this Privacy Policy.**

**InfoDesk Privacy Policy Version 1, Effective Date: 25 May 2018**