

## PRIVACY POLICY

Current version: December 31, 2020

We hereby inform you that Tritium Software, S.L.'s present Privacy Policy applies to the use of all ForceManager services offered through the Website at <https://forcemanager.net/>, through online and offline mobile devices, and through the desktop application.

The present Privacy Policy also details how we handle and process your data when you access our Website and when you give us your personal data through the available forms.

In order to provide clear and transparent information, we have created different sections in accordance with the data that is processed:

- ForceManager Platform
- Commercial information - marketing
- Applicants to Forcemanager' job openings
- Corporate events
- General

These sections detail the purposes for which we process your data, for how long we will have access to and process your data, with whom we are able to share it, what your rights pertaining to said data are, and additional relevant information, in compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the "European Regulation" or "GDPR"), and the current Organic Law on Data Protection in Spain (LOPD).

For the sake of clarity, the General section applies to all users of our Website and provides a general outline of our data processing policy for those cases not included in the abovementioned specific sections.

Finally, and before proceeding to the specific sections, we hereby inform you that all of them are subject to the following Security Policy. Moreover, all sections, with the exception of the ForceManager Platform that has its own specific content, are subject to the "*Rights of the Data Subject*" part below.

### ***Security***

Tritium Software, S.L. has adopted the necessary security measures to ensure compliance with article 32 of the GDPR. In this sense, Tritium Software, S.L. has established all technical and organizational measures to ensure a level of security appropriate to the risk, taking into the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons.

In any event, Tritium Software S.L. commits to implement measures to:

- a) Guarantee the confidentiality, integrity, availability and resilience of all systems and services.
- b) Restore availability and access to personal data in a timely manner in the event of a physical or technical incident.
- c) Verify, evaluate and assess the effectiveness of technical and organizational measures on a regular basis in order to guarantee the security of processed data.
- d) Pseudonymize and encrypt personal data where necessary.

For more information please refer to our Security Policy located at: <https://forcemanager.net/info/privacy/>

### ***Rights of the Data Subject***

We inform you that you have the right to request Tritium Software, S.L. to confirm if it is processing your personal data. You have the right to access your personal data, the right to request the rectification of incorrect data, or to request us to erase unnecessary data at any time. You may also request the portability of your personal data and restrict its use. In said even your data will only be held for the purpose of exercising or defending claims. Under certain circumstances, or personal reasons, you may object to processing of your data. In said event, Tritium Software, S.L. will refrain from processing your data unless for legitimate purposes, or for the purpose of exercising or defending any potential claims. Said rights may be exercised by sending a letter to Tritium Software, S.L. at Calle Josep Irla i Bosch 1-3, 08034, Barcelona, or by sending an email to [gdpr@forcemanager.net](mailto:gdpr@forcemanager.net). Identification may be required (national identity card, passport or equivalent) to prove your identity. Any claims relating to the handling and processing of your personal data can be sent to the Spanish Data Protection Agency ([www.agpd.es](http://www.agpd.es)).

Tritium Software, S.L. reserves the right to modify the present Privacy Policy at any time, and, when required to do so by law, we will inform you of those changes. In the event substantial changes are made, we will notify you of the update in advance, via email or through our ForceManager platform.

## **FORCEMANAGER PLATFORM**

### **Company details for Tritium Software**

TRITIUM SOFTWARE, S.L. (also "ForceManager")

C/Josep Irla i Bosch 1-3, 08034 Barcelona

B-64685092

Phone: +34 931 173 886

Email: [gdpr@forcemanager.net](mailto:gdpr@forcemanager.net)

Tritium Software S.L. is only responsible as per the processing of the contact information and invoicing data of its Clients.

As per the Data, as this term is defined in the General Terms and Conditions of Contract and Use set forth by Tritium Software, S.L. (and for your convenience, detailed in sections b) to e) below, all included), Tritium Software S.L. is the Data Processor. As such, Tritium Software, S.L.' responsibility is limited to comply with mentioned General Terms and Conditions and, where appropriate, with any specific Data Processing Agreement entered into.

By means of the acceptance of the present Privacy Policy, the Client and User accept and expressly consent to the collection, use, processing and, where appropriate, transfer of data to third parties, in accordance with the terms stated herein.

For the avoidance of doubt, references to Tritium Software, S.L. or ForceManager shall be understood to be made to any of the companies within the ForceManager' group, in case the Services are directly contracted to one of them.

**Categories of data that we process:**

- a) Client' contact details and invoicing data, including postal and/or email addresses (Client data)
- b) User contact details
- c) Information based on the User's commercial activity in order to provide certain features included in the ForceManager platform, once activated:
  - Geographic location
  - Date, duration and speaker for telephone calls
  - Received and issued communications
  - Issued voice commands
  - Provided photographs
  - Details of video-calls held through solutions integrated in the Platform, such as time, length and content of those calls, with the possibility to include the complete recording of those calls, regardless of whether they have been made with the video (camera) option activated or deactivated.
  - Other information relating to user commercial activity
- d) Multimedia content sent to the platform
- e) Third-party data and information, for which the Client is responsible, that is uploaded to the ForceManager platform by the Client or User.

The Client and, where appropriate, the User may unsubscribe for the features detailed in point c) above, through the personalized settings on the application or by contacting Tritium Software S.L. The Client may also activate new features by contacting Tritium Software S.L. to request a quote. The Client is responsible for informing their users of any changes.

## **Purposes of Data Processing**

The aforementioned data shall be processed by Tritium Software S.L. for the following purposes:

- Managing and maintaining existing Client relationships
- The provision of services contracted by our Clients, including the management, administration, provision, extension and improvement of content, data and services offered by Tritium Software S.L. and other members of our group.
- Designing new services and/or content
- Communicating service updates
- For statistical purposes relating to our services

Once a Client or User has expressly provided consent by activating the corresponding box, their data will also be used to send a) ForceManager Newsletters with sales, technological and industry news and updates, and b) periodical marketing campaigns related to ForceManager products and services.

## **Term of processing**

Tritium Software, S.L. will store and keep the Data during the provision of our Services. Upon termination of Services, Tritium Software S.L. will store all Data for a period of thirty (30) days. Further to this period, we will block all necessary data so that it cannot be directly accessed but it can be made available to Public Administrations, Judges and Tribunals in the event of any subsequent claims, for the corresponding prescription period. Once the prescription period has terminated, all data will be deleted and/or destroyed. Notwithstanding the aforementioned, Tritium Software S.L. may store anonymous data relating to the use of services for the purpose of quality control and improvements.

In the event consent has been given to receive Newsletters and commercial information, Tritium Software S.L. will store client and/or user contact details, as the case may be, unless consent is revoked by the Client or User.

## **Legal Basis**

The Tritium Software S.L. solution/platform enables Clients to process the Data. For this reason, the legal basis for Tritium Software S.L. to act as Data Processor, is the need to render the Services according to our General Terms and Conditions of Use and Services (article 6.1 b) GDPR).

Processing of Client and User contact details for commercial communications purposes is based on their express consent. Clients and Users may revoke their consent at any time by sending an email to [gdpr@forcemanager.net](mailto:gdpr@forcemanager.net). They may also unsubscribe from Newsletters and commercial communications at any time by following the instructions indicated in each message.

## **E-mail and calendar data synchronization**

### ***Access***

Once the user activates the option of “Email Synchronization” in the Settings section of ForceManager platform and connects his ForceManager account with his mailbox, the ForceManager platform can synchronize user’s e-mails messages and/or calendar events.

### ***Use***

Once all user’s e-mails messages are downloaded, ForceManager platform identifies those messages that are related to the user’s commercial activity and are those commercial messages the only ones that are showed in the “Activity” section of the platform (hereinafter the “Commercial Messages”). The rest is deleted and not stored.

As per the calendar events, we make a unidirectional or bidirectional synchronization, as the case might be, between user’s calendar in ForceManager platform and user’s mailbox calendar (hereinafter the “Calendar Events”). Commercial Messages and Calendar events are hereinafter referred as Commercial Data.

Tritium Software, S.L. does not make any use of the Commercial Data except for the storage activity described hereinbelow.

### ***Storage***

Tritium Software, S.L. stores each user Commercial Data in the corresponding ForceManager client’s database. Those databases are located in Amazon Web Services (AWS) servers in Ireland region.

### ***Sharing***

Tritium Software, S.L., does not share the Commercial Data with any third party, nor with any related party within the ForceManager group.

### ***Additional Limits on Use of User’s Commercial Data and other user’s data:***

Notwithstanding anything else in this Privacy Policy, if the user provides ForceManager platform access to the following types of user’s Google data, ForceManager platform’s use of that data will be subject to these additional restrictions:

- ForceManager platform will only use, access to read, write, modify or control Gmail message bodies (including attachments), metadata, headers, and settings to provide a web email client that allows users to compose, send, read, and process e-mails and will not transfer this Gmail data to others unless doing so is necessary to provide and improve these features, comply with applicable law, or as part of a merger, acquisition, or sale of assets.
- ForceManager platform will not use this Gmail data for serving advertisements.
- ForceManager platform will not allow humans to read this data unless we have the user’s affirmative agreement for specific messages, doing so is necessary for security purposes such as investigating

abuse, to comply with applicable law, or for the ForceManager platform's internal operations and even then only when the data have been aggregated and anonymized.

ForceManager platform's use and transfer to any other app of information received from Google APIs will adhere to [Google API Services User Data Policy](#), including the Limited Use requirements<sup>1</sup>.

## **User Identification and Automatically Collected Data**

Tritium Software S.L. may automatically collect certain data about Users when they access and use the ForceManager platform. Said information will not necessarily reveal the identity of the User but it may include user's device information such as: hardware model, device ID, operating system, web browser (such as Firefox, Safari or Internet Explorer), MAC address, IMEI and IP address.

As an example, Tritium Software S.L. may collect and store in its logs, user browser data, language preference, geographical location (in a broad sense, i.e. country or city) and other technical data collected using Cookies, pixel tags and other technology that serves to identify your browser. For more information please refer to our Cookies Policy at <https://forcemanager.net/es/info/cookies/>

In addition, when a Client and, where appropriate, a User submits a sign up form, we may collect data relating to geographic location, including continent, country, city, postcode and location.

The aforementioned data is collected and processed by Tritium Software S.L. for the following purposes:

- To ensure our services are subjected to *quality control measures* and to avoid undesired errors or interruptions of the service.
- *Research and development* - by gathering this data we are able to understand exactly how a User interacts with our services. This data also helps us to personalize, measure and improve our services as well as the content and design of our application, and it enables us to develop more services.
- *To improve the User experience* whilst using the ForceManager application and corporate Website  
- we process this data so that we can provide a personalized service and implement requested preferences.

This data may be collected directly or by means of third-party providers subject to our instructions and the corresponding Data Processing Agreement. Said third-party providers are located both in and outside of the EU, in countries with the adequate guarantees.

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<sup>1</sup> This sentence is in force since February 22, 2021.

The legal basis for the processing of all the aforementioned data is your express consent (article 6.1 a) GDPR).

Tritium Software S.L. will store this data for the duration of the aforementioned purposes unless you revoke your consent, as indicated in the “*Rights*” section below.

### **Whom we share your Data with?**

Our client’s personal data and all data listed above, can be shared with and communicated to ForceManager Ltd., a company domiciled in London (W2 6BD), Paddington 2 Kingdom Street, 6 Fl, United Kingdom and to Sellf, S.r.l. (A Socio Unico) with domicile in Via Sile 41, CAP 31056, Roncade (TV) Italy; and transferred to (i) ForceManager Colombia, S.A.S., a company domiciled in Bogota, Calle 85 N° 11-53 INT. 10 OF.401, Colombia, (ii) ForceManager Inc. a company domiciled in USA, 90 Canal Street, 4<sup>th</sup> Floor, Boston, Massachusetts, 02114, and (iii) ForceManager S. DE R.L. DE C.V. with registered office at México, Calle Girasol 40, Colonia los Angeles Apanoaya, Iztapalapa, 09710, Mexico City, all of them companies of ForceManager’ group, to the extent necessary to fulfil purposes mentioned above. Tritium Software, S.L. has entered into data processing agreements with those companies, which include standard data protection clauses.

In any case, Tritium Software, S.L. takes any and all appropriate measures to maintain the security of your personal data, both throughout the transmission of said data and at destiny, and as a group of companies, it guarantees compliance of data protection regulation in force, including GDPR.

Finally, our service providers may also process the aforementioned data and act as Data Processors under our specific instructions and in compliance with the corresponding Data Processing Agreement, so Tritium Software, S.L. can render the Services according to approved General Terms and Conditions of Contract and Use. Said suppliers provide ancillary services that are required to ensure the proper provision of our services.

In the event any personal data processing needs to be subcontracted to a third party, Tritium Software S.L. shall communicate this in writing and at least one month in advance to our Clients, explaining what data is being subcontracted and who the subcontracting party is, including relevant contact details.

### **Rights**

As regards to our client’s personal data, if any, and users’ personal data, both, clients and users have the right to request Tritium Software, S.L. to confirm if it is processing their personal data. You have the right to access your personal data, the right to request the rectification of incorrect data, or to request us to erase unnecessary data at any time. You may also request the portability of your personal data and restrict its use. In said even your data will only be held for the purpose of exercising or defending claims. Under certain circumstances, or personal reasons, you may object to processing of your data. In said event, Tritium Software, S.L. will refrain from processing your data unless for legitimate purposes, or for the purpose of exercising or defending any potential claims. Said rights may be exercised by sending a letter to Tritium Software, S.L. at Calle Josep Irla i Bosch 1-3, 08034, Barcelona, or by sending an email to

[gdpr@forcemanager.net](mailto:gdpr@forcemanager.net). Identification may be required (national identity card, passport or equivalent) to prove your identity. Any claims relating to the handling and processing of your personal data can be sent to the Spanish Data Protection Agency ([www.agpd.es](http://www.agpd.es)).

As regards to Third-Party Data, as defined in the General Terms and Conditions of Contract and Use, the Client, as the Data Controller, is responsible for managing all data subjects requests, especially when Third-Party Data includes special categories of personal data, with full indemnity for Tritium Software S.L.

## COMMERCIAL INFORMATION - MARKETING

### Data Controller

TRITIUM SOFTWARE, S.L. (also "ForceManager")

C/Josep Irla i Bosch 1-3, 08034 Barcelona

B-64685092

Telephone: +34 931 173 886

Email: [gdpr@forcemanager.net](mailto:gdpr@forcemanager.net)

### Processed data categories include:

- Identifying data
- Contact details
- Postal and/or email addresses
- No sensitive data is processed

### Purposes of Data Processing

We hereby inform you that any and all data supplied to us will be processed and used by Tritium Software, S.L. for the purposes of processing your information request and providing you with the requested technological, operational or commercial data and information on ForceManager products and services, and those of its group entities, including, as the case may be, information about our new products and services or any possible promotions. Once expressly accepted by you, by activating the corresponding box, your data will also be used to send you the ForceManager Newsletter with sales, technological and industry news and updates, as well as periodical marketing campaigns related to ForceManager products and services.

### Term of processing

Tritium Software, S.L. will keep your personal data after receipt of your request unless you file a request to the contrary. This means that your data can be used throughout this period for the aforementioned purposes.

### Legal Basis

You are responsible for the lawfulness and veracity of data filled in in the correspondent form. The processing of your data is based on your explicit consent. Said consent for the processing of your data may be revoked at any time by sending an email to [gdpr@forcemanager.net](mailto:gdpr@forcemanager.net). You may also opt out of



marketing communications at any time by following the instructions contained within each issued communication.

### **Data Recipients**

You consent that your personal data can be shared with and communicated to ForceManager Ltd., a company domiciled in London (W2 6BD), Paddington 2 Kingdom Street, 6 Fl, United Kingdom and to Sellf, S.r.l. (A Socio Unico) with domicile in Via Sile 41, CAP 31056, Roncade (TV) Italy; and transferred to (i) ForceManager Colombia, S.A.S., a company domiciled in Bogota, Calle 85 N° 11-53 INT. 10 OF.401, Colombia, (ii) ForceManager Inc. a company domiciled in USA, 90 Canal Street, 4<sup>th</sup> Floor, Boston, Massachusetts, 02114, and (iii) ForceManager S. DE R.L. DE C.V. with registered office at México, Calle Girasol 40, Colonia los Angeles Apanoaya, Iztapalapa, 09710, Mexico City, all of them companies of ForceManager' group, to the extent necessary to fulfil purposes mentioned above. Tritium Software, S.L. has entered into data processing agreements with those companies, which include standard data protection clauses.

In any case, Tritium Software, S.L. takes any and all appropriate measures to maintain the security of your personal data, both throughout the transmission of said data and at destiny, and, as a group of companies, it guarantees compliance of data protection regulation in force, including GDPR.

Finally, our service providers may also process the aforementioned data and act as data processors under our specific instructions and in compliance with the corresponding Data Processing Agreement. Said suppliers provide ancillary services that are required to ensure the proper functioning of our services and the fulfilment of purposes stated above.

### **APPLICANTS TO FORCEMANAGER' OPENING POSITION**

#### **Data Controller**

TRITIUM SOFTWARE, S.L. (also "ForceManager")

C/Josep Irla i Bosch 1-3, 08034 Barcelona

B-64685092

Telephone: +34 931 173 886

Email: [gdpr@forcemanager.net](mailto:gdpr@forcemanager.net)

#### **Processed data categories include:**

- Identifying data
- Postal and/or email addresses
- Academic and employment records
- No sensitive data is handled

#### **Purposes of Data Processing**

We hereby inform you that any and all data supplied to us will be processed and used by Tritium Software, S.L., for the purposes of processing your job application, for the provision of ForceManager services to

you as an applicant, and, if applicable, to determine if your profile is a match for any other job opening within the ForceManager Group, as detailed below.

### **Term of processing**

ForceManager will maintain a record of your personal data for a period of one (1) year further to receiving your application. This means that throughout this period we may use your data to contact you in the event a suitable position arises.

### **Legal Basis**

The processing of your data is based on your explicit consent. You may review or deactivate your candidate profile, or revoke your consent for the processing of your personal data, at any time by sending an email to [gdpr@forcemanager.net](mailto:gdpr@forcemanager.net).

We normally collect your data directly from you. However, in some cases, your data can be collected through third-parties. In such a case, we will inform you within a reasonable period of time, once your data is collected, but no later than one (1) month from that date.

### **Data Recipients**

In order to determine if your profile is a match for other positions within the ForceManager Group, you consent to the communication of your personal data to ForceManager Ltd., a company domiciled in London (W2 6BD), Paddington 2 Kingdom Street, 6 Fl, United Kingdom and to Sellf, S.r.l. (A Socio Unico) with domicile in Via Sile 41, CAP 31056, Roncade (TV) Italy; and transferred to (i) ForceManager Colombia, S.A.S., a company domiciled in Bogota, Calle 85 N° 11-53 INT. 10 OF.401, Colombia, (ii) ForceManager Inc. a company domiciled in USA, 90 Canal Street, 4<sup>th</sup> Floor, Boston, Massachusetts, 02114, and (iii) ForceManager S. DE R.L. DE C.V. with registered office at México, Calle Girasol 40, Colonia los Angeles Apanoaya, Iztapalapa, 09710, Mexico City, all of them companies of ForceManager' group, to the extent necessary to fulfil purposes mentioned above. Tritium Software, S.L. has entered into data processing agreements with those companies, which include standard data protection clauses.

In any case, Tritium Software, S.L. takes any and all appropriate measures to maintain the security of your personal data, both throughout the transmission of said data and at destiny, and as a group of companies, it guarantees compliance of data protection regulation in force, including GDPR.

We also inform you that your data will be shared with BambooHR LLC, a company with registered office at 335 South 560 West London, UT 84042-1911 USA, that provides a Human Resources software as a service, in compliance with EU-US Privacy Shield and which servers are located in Europe.

Finally, our service providers may also process the aforementioned data and act as data processors under our specific instructions and in compliance with the corresponding Data Processing Agreement. Said suppliers provide ancillary services that are required to ensure the proper functioning of our services and the fulfilment of purposes stated above.

## CORPORATE EVENTS

### Data Controller

TRITIUM SOFTWARE, S.L. (also "ForceManager")

C/Josep Irla i Bosch 1-3, 08034 Barcelona

B-64685092

Telephone: +34 931 173 886

Email: [gdpr@forcemanager.net](mailto:gdpr@forcemanager.net)

### Processed data categories include:

- Identifying data
- Postal and/or email addresses
- Photographs and images taken during your participation in the event
- No sensitive data is handled

### Purposes of Data Processing

We hereby inform you that any and all data supplied to us will be processed and used by Tritium Software, S.L. for the purposes of (i) managing and organizing the event that you have registered for (ii) registering participants (iii) publishing photographs and recorded images of event participants, taken at the event itself, through our website, social media channels or any media channel, (iv) issuing invoices, where appropriate, to event participants and, in general (v) managing and organizing the corporate event.

Once expressly accepted by you, by activating the corresponding box, your data will also be used to send you the ForceManager Newsletter with sales, technological and industry news and updates, as well as periodical marketing campaigns related to ForceManager products and services.

### Term of processing

ForceManager will keep your personal data after receipt of your registration to the event, unless you file a request to the contrary. This means that your data can be used throughout this period for the aforementioned reasons.

### Legal Basis

You are responsible for the lawfulness and veracity of data filled in in the correspondent registration form. The processing of your data is based on your explicit consent. Said consent for the processing of your data may be revoked at any time by sending an email to [gdpr@forcemanager.net](mailto:gdpr@forcemanager.net). You may also opt out of marketing communications at any time by following the instructions contained within each issued communication.

The present consent for use of recorded or photographic images has been granted in accordance with Organic Law 1/1982 of May 5th on the Civil Protection of the Right to Honor, Personal and Family Privacy, and Individual Likeness.

### **Data Recipients**

You consent that your personal data, including photographs and images taken at the event, will be shared through media or social media platforms, as well as through our website at <https://forcemanager.net>.

You also consent that your data may be shared with the sponsors of the event that you have registered for. Said sponsors will process your data for the same reasons as detailed above.

You also consent that your personal data can be shared with and communicated to ForceManager Ltd., a company domiciled in London (W2 6BD), Paddington 2 Kingdom Street, 6 Fl, United Kingdom and to Sellf, S.r.l. (A Socio Unico) with domicile in Via Sile 41, CAP 31056, Roncade (TV) Italy; and transferred to (i) ForceManager Colombia, S.A.S., a company domiciled in Bogota, Calle 85 N° 11-53 INT. 10 OF.401, Colombia, (ii) ForceManager Inc. a company domiciled in USA, 90 Canal Street, 4<sup>th</sup> Floor, Boston, Massachusetts, 02114, and (iii) ForceManager S. DE R.L. DE C.V. with registered office at México, Calle Girasol 40, Colonia los Angeles Apanoaya, Iztapalapa, 09710, Mexico City, all of them companies of ForceManager' group, to the extent necessary to fulfil purposes mentioned above. Tritium Software, S.L. has entered into data processing agreements with those companies, which include standard data protection clauses.

In any case, Tritium Software, S.L. takes any and all appropriate measures to maintain the security of your personal data, both throughout the transmission of said data and at destiny, and as a group of companies, it guarantees compliance of data protection regulation in force, including GDPR.

Finally, our service providers may also process the aforementioned data and act as data processors under our specific instructions and in compliance with the corresponding Data Processing Agreement. Said suppliers provide ancillary services that are required to ensure the proper functioning of our services and the fulfilment of purposes stated above.

## **GENERAL**

### **Data Processing**

In the event of a request by a data subject, only information deemed strictly necessary for identifying and addressing its request shall be collected. Said information will be treated faithfully and lawfully by Tritium Software, S.L. Additionally, personal data may be collected for specific and legitimate purposes and will be processed according to such purposes.

Data collected from each data subject will be appropriate, relevant and non-excessive in relation to the corresponding purposes for each case, and information will be updated whenever necessary.

The data subject will be informed, prior to the collection of their data, of the general terms of the present Policy so that they can provide their express, precise and unequivocal consent for the processing of their data, in accordance with the following aspects.

### **Purposes of Data Processing**

The explicit purposes for which data is processed are detailed in the informative clauses (Basic Data Protection Information) included in each of the data collection channels (website forms, paper forms, conversations, notices or informative messages).

Notwithstanding, personal data shall only be processed in order to provide an effective response to data subject requests, as specified in the form or data collection system used.

If the data subject has expressly provided consent by activating the corresponding box, their data will also be used to send a) ForceManager Newsletters with sales, technological and industry news and updates, and b) periodical marketing campaigns related to ForceManager products and services.

### **Legal Basis**

In general, prior to the processing of personal data, Tritium Software, S.L. must obtain express and unequivocal consent from the data subject by means of the consent clauses incorporated in the various data collection systems.

Notwithstanding, in the event User consent is not collected, the legal basis for our processing of data will be a specific law or regulation authorizing or requiring access and processing of such data by us.

You are responsible for ensuring the veracity and lawfulness of all data included in the form. You may revoke your consent at any time by sending an email to [gdpr@forcemanager.net](mailto:gdpr@forcemanager.net). You may also unsubscribe for commercial communications at any time by following the instructions indicated in each message.

### **Where does the personal data come from?**

As a general rule, personal data is always collected directly from the interested party. However, under specific circumstances, data may be collected through third-parties. In said event, we will inform the interested party in a timely manner once data has been obtained and within one (1) month at the latest.

### **User Identification and Automatically Collected Data**

Tritium Software S.L. may automatically collect certain data about Users when they access the ForceManager corporate Website. Said information may not necessarily reveal the identity of the website user but it may include information about operating system version, web browser (such as Firefox, Safari or Internet Explorer) and geographical location, including, continent, country, city, postal code and specific location.

This data is collected and processed by Tritium Software S.L. for following purposes:

- To *improve your experience* as a user of our website and provide a personalized experience
- To better understand how you use and interact with our website, so we can *improve its design and content*
- To ensure an *adequate quality control*, to avoid undesired errors or interruptions.

This data may be collected directly or by means of third-party providers subject to our instructions and the corresponding Data Processing Agreement. Said third-party providers are located both in and outside of the EU, in countries with the adequate guarantees.

The legal basis for the processing of all data detailed in this section for the aforementioned purposes, is your express consent (article 6.1 a) GDPR).

Tritium Software S.L. will store this data for the duration of the aforementioned purposes unless you revoke your consent, as indicated in the "*Rights of the Data Subject*" section included in the introduction of the present Privacy Policy.

### **Data Recipients**

Your data may be shared with and communicated to ForceManager Ltd., a company domiciled in London (W2 6BD), Paddington 2 Kingdom Street, 6 Fl, United Kingdom and to Sellf, S.r.l. (A Socio Unico) with domicile in Via Sile 41, CAP 31056, Roncade (TV) Italy; and transferred to (i) ForceManager Colombia, S.A.S., a company domiciled in Bogota, Calle 85 N° 11-53 INT. 10 OF.401, Colombia, (ii) ForceManager Inc. a company domiciled in USA, 90 Canal Street, 4<sup>th</sup> Floor, Boston, Massachusetts, 02114, and (iii) ForceManager S. DE R.L. DE C.V. with registered office at México, Calle Girasol 40, Colonia los Angeles Apanoaya, Iztapalapa, 09710, Mexico City, all of them companies of ForceManager' group, to the extent necessary to fulfil purposes for which they have been collected. Tritium Software, S.L. has entered into data processing agreements with those companies, which include standard data protection clauses.

In any case, Tritium Software, S.L. takes any and all appropriate measures to maintain the security of your personal data, both throughout the transmission of said data and at destiny, and as a group of companies, it guarantees compliance of data protection regulation in force, including GDPR.

Finally, and as the case may be, our service providers may also process the aforementioned data and act as data processors under our specific instructions and in compliance with the corresponding Data Processing Agreement. Said suppliers provide ancillary services that are required to ensure the proper functioning of our services and the fulfilment of purposes stated above.