

# Aposphere Privacy Statement

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Aposphere is a work management platform that provides teams with the tools to orchestrate their work.

At Aposphere, our mission is your mission. Our customers' trust and partnership are very important to us. Our entire privacy statement provides clarity around how we use your information.

As you use and interact with Aposphere's websites, products, and services, we process information from and about you in order to provide access to our tools, an enhanced experience, and support. That means that we collect, use, transmit, store, share, and erase your information.

This Privacy Statement describes how Aposphere processes your information and explains the choices available to you with respect to your information.

If you have any questions or concerns about how Aposphere processes your information or about this Privacy Statement, you can email us any time at [privacy@aposphere.com](mailto:privacy@aposphere.com).

It's important to us that you're able to clearly understand how we process your information and what rights you have under privacy and data protection laws.

In addition, we also clarify when we would be processors of your data and when we would be the controller (see below in Our Relationship With You).

We welcome any questions, concerns or feedback you may have about the updates to this Privacy Statement.

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## A) Our Relationship With You

Aposphere is the processor/service provider (a provider that processes personal data on behalf of or at the direction of a controller, or other similar designation under the law) and our customer (usually a company or organization) is the controller/business (the entity that decides how and why

information is processed) of the information provided to Aposphere via use of Aposphere. In all other cases, Aposphere is the controller of the information.

For example, if you create an account with

- your corporate email address, your company is the controller of that information.
- a free email domain (like gmail.com) or personal email account, Aposphere is the controller.

Aposphere can be used by companies or by individual users:

If you're using Aposphere through your company, educational institution, or with your company email address, your company or educational institution's own Aposphere administrator is responsible for the accounts associated with that company or institution and can: restrict, suspend, or terminate your access to or ability to use the services, access information about you, access or retain information stored with us (including your organization workspace content and log data about your use of Aposphere), and restrict your ability to edit, restrict, modify, or delete information associated with your use of our products and services.

## B) Our Relationship With You

Aposphere processes information we receive directly from you, automatically collected when you use Aposphere or visit one of our websites, and collected by Aposphere from third parties. However, please note that this Privacy Statement does not apply to the processing of your information by third-parties through your use of any third-party integrations available via our services. Please visit those third-party websites directly for more information on their privacy and data protection practices.

### Information Aposphere Receives Directly From You

#### Information needed to create an account

This includes information that is needed for Aposphere to create an account for you and manage your ability to log in and out of Aposphere:

- Identifiers, such as first and last name and email address
- Your password for Aposphere (hashed) - unique, long, and strong, please
- Information related to a third-party authentication identity provider, such as Google Authenticator

If you upgrade your account to a paid account, Aposphere may collect:

- Billing information, such as name, address, and telephone number
- Financial information, such as credit card information collected by our payment processors on our behalf
- Information about your chosen Aposphere plan

#### Information you provide to us through your use of Aposphere

- Information you provide in portfolios, programmes, projects, models, diagrams, lists, data integration-trackers and datasets as well as workplan-tasks.
- Information uploaded to Aposphere, such as attachments

- Profile photo and other information you choose to include to describe yourself, only collected if you do choose to provide it, such as your gender pronouns
- Professional or employment information, such as your title or role at your company
- Any other information you choose to provide while using Aposphere that identifies or can be reasonably associated with you
- Information about your contacts, if you choose to provide it

Other information you may provide to us when you interact with Aposphere in other ways

You may voluntarily provide us with information when you interact with us in other ways, such as when you directly interact with Aposphere staff, such as our sales, user research, or user operations groups. Aposphere may process:

- Your requests, questions, and responses to us via forms or email
- Information you provide in connection with Aposphere sweepstakes, contests, or research studies, if you choose to participate
- Information to verify your identity
- Your date of birth
- Your audio and video, if you participate in a sales call or user research study and do not opt out of call recording, which also involves the collection of biometric information associated with the call recordings
- Information automatically processed when you visit our websites or use one of our mobile or desktop apps
- Information related to your use of Aposphere and our websites

We may also collect the following:

- Metadata and inference information related to your use of Aposphere, our websites, and third-party integrations to better understand the way you work in Aposphere. We may log the actions you take as you use Aposphere, including but not limited to the number of Aposphere organisation-workspaces you work in, the number of portfolios, programmes, projects, models, datasets and tasks you are assigned, when you delete the aforementioned categories or comments within these, the features and embedded content you interact with, the types of files you share, and what, if any, third-party integrations you use.
- Internet network activity, cookies, and similar tracking technologies, including data our servers automatically record, such as your web request, IP address, browser type and settings, referring/exit pages and URLs, number of clicks, date and time stamp information, language preferences, and other such information.
- Information collected as a result of participation in beta testing
- Information about how you interact with our marketing websites, like Aposphere.com, such as where you click, how long you visit a page, your scrolling, mouse hovers, and other data to help us better understand your experience and provide you with the best user experience

- Device information and activity when you use Aposphere via a mobile device, such as the type of device you are using, device IDs, operating system version, and mobile network information, which may include your mobile phone number.
- Derived device geolocation information, such as approximate geographic location inferred from an IP address

#### Information Aposphere Receives from Other Sources

Sometimes Aposphere receives your information from third-parties (other individuals, marketing services, third-party integrations), which may include:

- Information processed from third-party integrations you set up with Aposphere. For example a third-party integration may give us access to information stored in that third party that Aposphere will process to facilitate the integration
- Name, email, and business contact information
- Information about you provided to us from other individuals or users of Aposphere

#### C) How We Use Your Information

Aposphere uses your information to operate our products and services, communicate with you, process transactions when you change Aposphere plans, for security and fraud prevention, and to comply with the law. We may process your information to:

Provide services to you and operate our business

- Maintain, provide, and improve our products and services
- Help us better understand user interests and needs, and customize Aposphere for you
- Analyze and research how you interact with our websites and applications
- Protect Aposphere and you, for example:
  - Securing our systems and products against fraud or unauthorized activity
  - Identifying, troubleshooting, and fixing bugs and errors
  - Complying with global laws and regulations
- Investigate (in good faith) alleged violations of our User Terms of Service
- Comply with a valid legal subpoena, request, or other lawful process that meets the requirements of our Guidelines or that we otherwise determine is necessary to respond to
- If you use Aposphere as part of an organization, company, or academic institution, Aposphere will process your personal information as required by our contract with your organization or academic institution. Those contractual terms may differ from, and take precedence over, the uses described in this Privacy Statement.

In addition, we use information about your use of Aposphere, account information (such as your email address and name), and information related to third-party integrations to:

- Communicate with you:
  - About Aposphere by phone, text, email, or chat

- To share important notices and updates, product changes, and other necessary notices such as security and fraud alerts
- To advertise or market Aposphere services to you. You have the ability to unsubscribe from promotional communications at any time
- Facilitate reporting and analyze performance of the Aposphere platform or features available in Aposphere
- Provide webinars or public presentations
- Demonstrate Aposphere or provide you access to a demo Aposphere instance
- Process your information at your direction
- Provide cross-device management of your account. For example, we may locate or try to locate the same unique users across multiple browsers or devices (such as smartphones or tablets), or work with service providers that do this, in order to save your preferences across devices and analyze usage of our products and services. If you wish to opt out of Google's ability to locate you across devices in this way, you may install the Google Analytics Opt-out Browser Add-on.

Provide you with support and get your feedback

- Respond to your requests for information
- Help identify and troubleshoot any issues with your account and answer your questions
- Resolve support requests
- Provide you with reports about usage
- Survey your opinions through surveys, research studies, and questionnaires

Combined Information

Unless otherwise prohibited by law, we may combine the information that we collect through your use of our products and services with information that we receive from other sources, both online and offline, and use that combined information as set out above.

Aggregated and De-identified data

We may aggregate and/or de-identify information related to your use of Aposphere (such as how many portfolios, programmes, projects, models, datasets and tasks you created) so that such information can no longer be linked to you or your device. We may use such aggregated and de-identified data for any purpose, including but not limited to for research and marketing purposes, and may also share such data with any third parties, including advertisers, promotional partners, sponsors, event promoters, and/or others.

Legal bases for processing. For more information about the legal bases Aposphere relies on to process your information, please visit [Other Important Information](#).

D) How We Share Your Information

We need to share the information we collect about you to make our products and services run smoothly and to operate our business under the following conditions:

- **Service Providers and Subprocessors.** We may provide access to or share your information with select third parties that use the information on our behalf to assist in providing Aposphere’s services, website, and features. These third parties provide a variety of services to us, including without limitation sales, marketing, provision of content and features, advertising, analytics, research, data storage, security, fraud prevention, and other services.
- **Advertising and Marketing.** We may provide information collected when you visit an Aposphere website (such as email addresses) to service providers, who may “match” this information in de-identified form to cookies (or mobile ad identifiers) and other proprietary IDs, in order to provide you with more relevant Aposphere ads when you visit other websites.
- **Because you ask us to share.** We may disclose your information to third parties when you ask us to do so. This includes when you connect Aposphere with other tools via our available integrations.
- **Consistent with your settings within our products and services.** Please note that the information you submit through and share in Aposphere may be viewable by other users in your workspace, team, division, organization, depending on the specific settings you have selected and if an organization has been created for your domain.
- **Affiliates and Subsidiaries.** We may share the information we collect within the Aposphere family of companies to provide Aposphere’s services to you.
- **Business Transfers.** If the ownership of all or substantially all of our business changes, or all or some of our assets are sold as part of a bankruptcy or other proceeding, we may transfer your information to the new owner so that the services can continue to operate. In such case, your information would remain subject to the promises and commitments contained in this Privacy Statement until the acquiring party updates it. If such transfer is subject to additional mandatory restrictions under applicable laws or agreements, Aposphere will comply with those restrictions.
- **Compliance with legal obligations.** To comply with a valid legal request, or other lawful process we will notify individuals or customers of that request unless: we are prohibited from doing so by law or court order; or there are exceptional circumstances, such as an emergency involving the risk of bodily injury or death to a person or group of people or potential harm to minors.
- **If you have one, your company’s own Aposphere account administrator.** If you’re using Aposphere in connection with an organization, academic institution, or company domain, your company’s own Aposphere account administrator can export data associated with the domain they manage if they have a subscription plan that allows them to do so.
- **Public Forums.** Our public forums, such as the Aposphere community forum, make it possible for you to upload and share comments or feedback publicly with other users. Any information that you submit through such public forums is not confidential, and Aposphere may use it for any purpose (including in testimonials or other Aposphere marketing materials). Any information you post openly in these ways will be available to the public at large and potentially accessible through third-party search engines. Such information can be read, collected and/or used by other users, and it could be used to send you unsolicited messages.

We use and share the categories of information we collect from and about you consistent with the various business purposes we discuss throughout this Privacy Statement. We do not share your information with third parties for their own direct marketing purposes. We do not sell your information as defined under applicable law.

#### E) Protection, Storage, Transfer & Retention of Your Information

##### Security

Aposphere takes technical and organizational measures to protect your information against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access. However, no method of transmission over the Internet, and no means of electronic or physical storage, is absolutely secure, and so we cannot ensure or warrant the security of that information. We are constantly reviewing and improving our safeguards.

##### Storage

When you use Aposphere, some information about you will be stored in European Economic Area (EEA), UK (United Kingdom) and Switzerland.

##### Transfer of Your Information across EEA, UK, and Switzerland

When you use our products and services, information about you will be held in EEA, UK and Switzerland where currently all of Aposphere's data processing occurs. We may also transfer information that we collect about you to third party processors across borders from your country or jurisdiction to other countries or jurisdictions around the world.

Aposphere uses appropriate technical and operational safeguards for cross-border transfers of personal data collected in the EEA, UK, and Switzerland, as required by applicable local law.

Aposphere commits to resolve complaints about your privacy and our collection or use of your personal data. If you have any questions or complaints regarding this privacy policy please contact Aposphere at: [privacy@aposphere.com](mailto:privacy@aposphere.com).

Aposphere will take reasonable and appropriate steps necessary to ensure that any third party who is acting as a "data processor" is processing the personal data we entrust to them in a manner that is consistent with principles of GDPR.

##### Data Retention

We will retain your information for the period necessary to fulfill the purposes outlined in this Privacy Statement, to make our products and services available to you, or as instructed by you, unless a longer retention period is required or permitted by law.

#### F) Other Important Information

##### Use by children under 16

If you are under the age of 16, you may not have an Aposphere account or use Aposphere's products or services. We do not knowingly process any information from, or direct any of our products or services to, children under the age of 16.

##### Marketing Practices and Choices

If you receive email from us, we may use certain analytics tools, such as clear GIFs, to capture data, such as when you open our message or click on any links or banners our email contains. This data allows us to gauge the effectiveness of our communications and marketing campaigns.

You may instruct us not to use your contact information to contact you by email, postal mail, or phone regarding products, services, promotions, and special events that might appeal to your interests by contacting us at the “Aosphere Contact Info” section below. In commercial email messages, you can also opt out by following the instructions located at the bottom of such emails.

Please note that, regardless of your request, we may still use and share certain information as permitted by this Privacy Statement or as required by applicable law. For example, you may not opt out of certain transactional, operational, or service-related emails, such as those reflecting our relationship or transactions with you.

#### Legal Bases for Processing Your Information

Our legal basis under the General Data Protection Regulation (GDPR) and associated relevant Data Protection legislation in the UK and Switzerland, for collecting and using your information described above will depend on the particular type of information and the specific context in which we collect it. Some examples of legal bases for processing that we rely on are:

- Where use of your information is necessary to perform our obligations under a contract with you (for example, to comply with the User Terms of Service which you accept by using Aosphere’s services or to fulfill the terms of a contract signed with companies)
- Where use of your information is necessary for our legitimate interests or the legitimate interests of others (for example, to provide security, operate our products and services, prevent fraud, analyze use of and improve our products and services, and for similar purposes)
- Where use of your information is necessary to comply with a legal obligation
- Where we have your consent to process data in a certain way

#### G) Your Privacy Rights

##### Your Privacy Rights

Aosphere users from around the world use our products to bring clarity to their work. Regardless of what country you’re located in, we respect your ability to know, access, correct, export, restrict the processing of, and delete your information, and have extended those rights globally. We will not discriminate against you for exercising your privacy rights.

##### Information About Your Rights

Upon your request, and subject to applicable legal exceptions, we will:

- provide access to and/or a copy of certain information we hold about you
- prevent the processing of your information for promotional purposes (including any direct marketing processing based on profiling)
- update information which is out of date or incorrect
- delete certain information which we have about you



- restrict the way that we process and disclose some of your information
- transfer your information to a third party provider of services
- revoke your consent for the processing of your information

Aposphere does not sell your data.

#### Exercising Your Rights

We will need to verify your identity and may need to verify your relationship with Aposphere (for example, if you're an administrator of an Aposphere Organization or Workspace and you're making a request on behalf of another individual) for security and to prevent fraud.

We may take additional steps to verify that you are authorized to make the request. If you are an end user of Aposphere's services and not a direct customer of Aposphere (for example, your company uses Aposphere and you're an employee or authorized representative of that company), you should direct requests relating to your information to the administrator of your company's Aposphere account. We will redirect you to your administrator or notify the administrator directly. To exercise your privacy rights, please contact us at [privacy@aposphere.com](mailto:privacy@aposphere.com). Please note, however, that certain information may be exempt from such requests in some circumstances, which may include if we need to keep processing your information for our legitimate interests or to comply with a legal obligation.

#### H) Changes To Our Privacy Statement

We will update this Privacy Statement to make sure it accurately reflects our data collection and use practices, our amazing features, advances in technology, or as applicable laws require. We will comply with applicable legal requirements regarding providing you with notice and/or consent when we make such changes, depending on the type of change made.

#### I) Contact Us and Privacy Questions

If you wish to contact us or if you have any questions about or complaints in relation to this notice, please contact us at [privacy@aposphere.com](mailto:privacy@aposphere.com).