

# GARRISON APP PRIVACY POLICY

## 1 Information About Us

- 1.1 The Garrison App is owned and provided by Garrison Technology Limited, a limited company incorporated under the laws of England and Wales with registration number 09286531, whose registered address is 117 Waterloo Road, London, SE1 8UL, United Kingdom ("**Garrison**", "**we**", "**us**" and/or "**our**").
- 1.2 Our Data Protection Officer may be contacted by email at [dpo@garrison.com](mailto:dpo@garrison.com).

## 2 The Garrison App Privacy Policy

- 2.1 Garrison has created this Privacy Policy to help you and your Organisation to understand what information, including Personal Data, we receive and how such information is used. Personal data is, in simple terms, any information about you that enables you to be identified ("**Personal Data**"). Personal Data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.
- 2.2 The Garrison App is intended for use by organisations that have engaged Garrison under a service contract ("**Organisation**" or "**Customer**") and their employees, contractors, members, or other participants ("**End User**", "**you**", or "**your**"). The Garrison App allows your Organisation's IT administrator (your "**IT Administrator**") to install, configure and manage your Organisation's instance of the Garrison System and allows End Users to access services provided by the Garrison System.
- 2.3 The Garrison System consists of two elements: a) the present Garrison App; and b) the Garrison components installed on the Customer's (your Organisation's) premises forming part of your Organisation's infrastructure ("**On Prem Infrastructure**") (collectively, the "**Garrison System**"). The On Prem Infrastructure is installed, configured and managed entirely by your Organisation's IT Administrator.
- 2.4 The Garrison App allows you to access and interact with the Garrison System from various locations and devices. The Garrison App will not work on your device until your IT Administrator provides you with access to the Garrison System.
- 2.5 During your use of the Garrison System your Organisation may receive information, including Personal Data, as described below. By installing the Garrison App on a device, you and your Organisation accept and are bound by this Privacy Policy. If you do not accept this Privacy Policy, you must stop using the Garrison App immediately.

## 3 Garrison as a processor – Information Garrison receives from your Organisation

- 3.1 As a general matter, Garrison does not collect information from you during your use of the Garrison App. Your Organisation is the controller of your Personal Data and other information collected through use of the Garrison System as your Organisation controls what information about you Garrison receives and how we use it. To the extent we receive any information about you, we will be acting as a processor and process such information according to your Organisation's instructions, because your Organisation is the controller.
- 3.2 The Garrison System may collect aggregated statistical and technical information about your device and your use of the Garrison System. Aggregated statistical and technical information may be accessible by your IT Administrator if they activate the logging functionality. If your IT Administrator enables this function and decides to share such information with us, Garrison may receive information about you, your device, and your use of the Garrison System.
- 3.3 To protect the security and integrity of your Organisation's assets, your IT Administrator may require you to use certain processes when connecting to the Garrison App through which your IT Administrator may receive further personal information.

- 3.4 Garrison is not responsible for the privacy or security practices of its Customers.
- 3.5 If you have questions about what information may be accessible or collected by your Organisation, you should contact your Organisation.

#### **4 Third Party Access to Your Information**

- 4.1 We do not share your information with any third party except any Garrison affiliated entities for the purpose of performing Garrison's contract with the Customer (your Organisation). However, the Garrison System may share information with third party service providers who are contracted to provide services for your Organisation. Third party service providers may provide hosting services, support services, and other services for your benefit and the benefit of your Organisation.
- 4.2 If you have questions regarding how your Organisation shares information with third parties, you should contact your Organisation.
- 4.3 The Garrison App may be used to give you access to other websites. Please note that we have no control over how your data is processed by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

#### **5 Location Data and Privacy Settings**

- 5.1 Garrison does not receive your geolocational information.

#### **6 International Data Transfers**

- 6.1 Your organisation or your third party providers who are contracted to provide services for your Organisation may use Personal Data shared by the Garrison System in a way that involves a transfer outside the UK and the EEA. If you have questions regarding if and how your organisation transfers your personal information outside the UK and the EEA, you should contact your Organisation.

#### **7 Cookies, Tracking Information and other Web Technologies**

- 7.1 The Garrison App does not use automatic collection tools, such as cookies, embedded web links and web beacons to send information back to Garrison. However, applications or programs that are deployed in the Garrison System may use automatic collection tools to collect information, including Personal Data and other information or device information, about you and your use of the Garrison System. Information and data collected, used, and transmitted by third party applications and services are governed by their own privacy policies.
- 7.2 We encourage you to learn about the privacy policies of all products, services, and applications prior to interacting with them in the Garrison System.

#### **8 Deletion of the Garrison App**

- 8.1 You may choose to delete the Garrison App from your device. If you do so you will lose your ability to access services provided by the Garrison System from your device.
- 8.2 Note that deleting the Garrison App from your device may not delete all of your data stored inside the Garrison System nor data that is already stored in your logs. To fully delete the data in the Garrison System you will need to contact your Organisation.

#### **9 Data Retention**

- 9.1 As required by law, Garrison shall not retain any Personal Data for any longer than is necessary in light of the purpose(s) for which that data is being processed to support Garrison service contract obligations towards the Customer, including (but not limited to) troubleshooting.

## 10 Your rights

- 10.1 Under Data Protection Legislation, you have the following rights:
- a) the right to be informed about our collection and use of your Personal Data;
  - b) the right to access the Personal Data held about you;
  - c) the right to have your Personal Data rectified if any of your Personal Data held is inaccurate or incomplete;
  - d) the right to be forgotten: the right to ask to delete or otherwise dispose of any of your Personal Data;
  - e) the right to restrict: the right to prevent the processing of your Personal Data;
  - f) the right to object to the use of your Personal Data for particular purposes;
  - g) the right to withdraw consent: where your consent is relied upon as the legal basis for using your Personal Data, you are free to withdraw that consent at any time;
  - h) the right to data portability: if you have provided Personal Data directly, and it is being used with your consent, or for the performance of a contract, and that data is processed using automated means, you can ask for a copy of that Personal Data to re-use with another service or business in many cases; and
  - i) rights not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects or significantly affects you. We will never process your Personal Data in this way.
- 10.2 Garrison as a data processor will act in accordance with your Organisation's instructions. For more information about use of your Personal Data or exercising your rights as outlined above, please contact your Organisation.
- 10.3 Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

## 11 How Do I Contact You?

- 11.1 We welcome the opportunity to cooperate with your Organisation if needed. Our Data Protection Officer may be contacted by email at [dpo@garrison.com](mailto:dpo@garrison.com).