



Privacy Policy

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1 - OVERVIEW

Resustain Limited and its related entities (“re:sustain”, “we” or “our”) is committed to protecting and respecting your privacy and your personal data. Personal data is any information relating to an identifiable person.

The following Privacy Policy outlines what personal data re:sustain collects about you when you visit our website resustain.com, when you use our products and services (our “Services”), or when you otherwise do business or make contact with us, what we do with that personal data, how we share it, and how we handle the personal data you place in our products and Services. It also explains the choices available to you regarding our use of your personal data and how you can access and update this personal data.

re:sustain is the controller and responsible for your personal data processed under this Privacy Policy. Our registered office address is:

Sustainable Workspaces
County Hall, 5th Floor
The Riverside Building
Belvedere Road
SE1 7PB

Our website address: <https://resustain.com>

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

2 - WHAT PERSONAL DATA DO WE COLLECT?

2.1 – Personal data you provide to us

We collect personal data when you provide us with such personal data in the course of using our website or Services. This includes:

Identity data including name and title.

Contact data including name; email address and telephone number.

Financial data including bank account and payment details.

Technical data including IP address; browser type and version; time zone settings and location; operating system and platform; and other technology on the device you use when accessing our website.

Profile Data including user name or identifier; and password.

We also collect personal data from you when you subscribe to our newsletter or other marketing. If you make an enquiry through our website, or contact us in any other way, we will keep a copy of your communications with us.

2.1.1 - Sensitive Data (Special Category Data)

We do not collect Special Category Data (as classified in the GDPR Art. (9)). This includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data.

2.1.2 - Our policy toward children

Our Services are not directed to children under 13 and we do not knowingly collect personal data from children under 13. If we learn that we have collected personal data of a child under 13 we will take steps to delete such personal data from our files as soon as possible.

2.2 – Personal data we collect from your use of our Services

We may process your personal data when you do business with us – for example, as a customer or prospective customer, or as a vendor, supplier, consultant, or other third party. For example, we may hold your business contact information and financial account information (if any) and other communications you have with us for the purposes of maintaining our business relations with you.

At certain times, another individual (such as an IT Administrator) may create an account for you and may provide your information, including personal data (most commonly when your company requests that you use our platform). We may collect personal data at the request of our customers and often have no direct relationship with the individuals whose personal data we process. If you are an employee of one of our customers and would no longer like us to process your personal data, please contact your employer. If you are providing information (including personal data) about someone else, you must have the authority to act for them and to consent to the collection and use of their personal data as described in this Privacy Policy.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

2.3 – Personal data we automatically collect

We may also collect certain technical information by automatic means when you visit our website, such as IP address, browser type and operating system, referring URLs, your use of our website, and other clickstream data. We collect this information automatically through the use of various technologies, such as cookies.

3 - HOW WE USE THE PERSONAL DATA WE COLLECT

The personal data we collect is used for the following purposes:

- Operate, maintain and iterate our Services.
- To create and administer records about any online account that you register with us.
- Provide a secure access mechanism to our Services, either through a web application, mobile application or directly through our API.
- To provide you with technical support.
- To improve our website (we continually strive to improve our website offerings based on the information and feedback we receive from you), including to improve the navigation and content of our sites.
- To provide you with information and access to resources that you have requested from us.
- For recruitment purposes, where you apply for a job with us.
- Send promotional communications, such as providing you with information about services, upcoming events, new features and news updates.

Marketing

We may use your personal data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product or service purchase or other transactions.

Legal basis

We process your personal data for the legal basis of:

Performance of contract where we are processing your personal data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract;

Complying with a legal obligation where we are processing your personal data where it is necessary for compliance with a legal obligation that we are subject;

Legitimate interest where the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us;

Consent means processing your personal data where you have signified your agreement by a statement or clear opt-in to processing for a specific purpose. Consent will only be valid if it is a freely given, specific, informed and unambiguous indication of what you want. You can withdraw your consent at any time by contacting us.

4 - USE OF COOKIES

re:sustain and our third party partners may use cookies to save site preferences for future visits; improve and customise services and your experience and to count visits and understand which areas and features of the websites and re:sustain Portal are most popular. Cookies are small files that a website, web application or its service provider transfers to your computers hard drive through your browser (if you permit) that allows the website, web application or service providers systems to identify your browser, store and remember certain information.

You may refuse to accept cookies by activating the setting on your browser that allows you to refuse the setting of cookies.

5 - SECURITY MEASURES

re:sustain implements a variety of security measures to ensure your data is secure and protected, these include but are not limited to:

- Forcing all APIs (REST and Pub/Sub) to operate over encrypted ports (HTTPS and TLS).
- Data encryption between services within the re:sustain cloud.
- File encryption on all database servers.
- Highly restricted access to Production Environments.
- Full enablement of 2FA and MFA across all services.

6 - DATA SHARING

We may, under certain circumstances, share your personal data with third parties:

- We work with trusted third party service providers to provide website, application development, hosting, maintenance, backup, storage, virtual infrastructure, analytics and other services for us. These service providers may have access to or process your personal data for the purpose of providing those services for us. Any sharing of personal data will be in accordance with the purposes set out in this Privacy Policy and applicable laws.

- We may also disclose your information (including personal data) to third parties where we believe it necessary or appropriate under law, for example: (1) to protect or defend our rights, interests, or property or that of third parties; (2) to comply with legal process or judicial orders; (3) to respond to requests from public or government authorities, including for national security and law enforcement purposes; (4) to prevent or investigate possible wrongdoing in connection with the Services or to enforce our Terms of Service; (5) to protect the vital interests of our users, customers, and other third parties.

We may use and share aggregated non-personal data with third parties for marketing, advertising, and analytics purposes.

- We may share personal data with HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.
- We may share personal data with third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

6.1 - Third Party Services used by our Services

We do not sell or trade your personal data or data to third parties.

6.2 - Third Party Services used by our Website

6.2.1 - Google Analytics

Our website and Services uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States . Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using our website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

If you wish to find out more about Google's security practises in relation to Google Analytics, please visit: <https://support.google.com/analytics/answer/6004245>

6.3 - Liability of Onward Transfers

Please be aware that other websites that can be accessed through our website or Services may collect your personal data. The information practices of those third-party websites linked to the website and/or our Services are not covered by this Privacy Policy.

7 - DATA STORAGE AND HOSTING

re:sustain hosts its Services and data within the European Economic Area. The servers and infrastructure upon which re:sustain stores your personal data are within a highly controlled environment and where data is transferred across the internet it is done so securely using industry standards such as HTTPS and TLS.

We do not transfer your personal data outside the European Economic Area.

Whilst re:sustain takes considerable efforts to protect your personal data, no security system is impenetrable and due to the nature of the internet, we cannot provide a complete guarantee that any information, during transmission through the internet or while stored on our systems or otherwise in our care, will be absolutely safe from intrusion by unauthorised third parties, such as hackers.

8 – DATA RETENTION

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

9 - YOUR RIGHTS – ACCESSING YOUR PERSONAL DATA

Under certain circumstances, you have rights under data protection laws in relation to your personal data. If you wish to exercise any of the rights set out below, please contact stuart@resustain.com.

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and

freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10 - CONTACT US

To contact our Data Privacy Officer, please use the following information:

REsustain Limited
Sustainable Workspaces
County Hall, 5th Floor
The Riverside Building

Belvedere road
SE1 7PB

Email: stuart@resustain.com