



## PRIVACY POLICY

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**Written by Dom Taylor (Operations Director)**

**This document outlines how Proactive (Activate Management Ltd), headquartered at Minerva Mill, Station Road, Alcester and affiliates (hereon referred to as “Proactive”), handles your data, be it personal or other information. As far as possible, we’ve used plain English to explain how we respect your privacy and why you should trust us with your data.**

This Privacy Policy applies to all products, services and websites provided by Proactive (collectively referred to as the “**Proactive Service**”), except where otherwise noted.

The Proactive Service is provided to two distinct groups. Firstly, our Service provides a platform and set of tools that enables people, companies and organisations to store and view data about incidents, hazards, and checklists that have been submitted to the platform by users (**Customers**), and secondly to groups who are able to submit data through, the provided platform and web app (**Users**). Proactive receives and handles information differently for customers and users, so we have split this Privacy Policy into two dedicated sections, one for each group.

## SECTION 1: PRIVACY FOR CUSTOMERS

E.g. Sports Club, Schools, Individual Coach account holders

### Our approach to your data

- **Your data is yours.** Proactive regards all content that you create within your account on the Proactive Service (reports, user accounts, email addresses etc.) as being your private property, owned wholly by you. Proactive does not sell your content or data to anyone, and we only process and make your data available as needed to provide the Proactive Service, except for a limited set of circumstances (e.g. Proactive is compelled by a law, or if you've given us permission to do so).
- **Your data is hosted on databases within the UK.** The Proactive Platform is hosted by NamesCo under the management of Magic Torch Collective (ICO 13175947)
- **Proactive is committed to processing and storing your data securely.**

### Information that Proactive collects

Proactive collects information relating to you and your use of the Proactive Service from varieties of sources which are listed below, along with details of how we use this information.

### Information we collect directly from you

- **Registration information.** You need to create a Proactive account before you can access the Proactive service. Our account signup collects your company name, an admin name, and 1 main contact email address.
- **Billing information.** If you make a payment to Proactive, we require that you provide your billing details, including name, address, email address and financial information corresponding to your selected method of payment (e.g. a credit card number and expiration date). If you provide a billing address, we will regard that as the location of the account holder. Proactive does not store or log any sensitive cardholder data provided by you. Proactive utilises the Stripe Payment Platform for payments but can also provide invoicing for direct payment
- **App data from users.** We store the data you and your app users upload, import and otherwise submit to us.
- **Other data you intentionally share.** We may store or collect your personal information or data if you explicitly send it to us for specified purposes. For example, if you give us a customer testimonial or participate in a Proactive sponsored marketing event.
- **We don't share, sell or use your users' information.** Proactive will not contact your users via email or other means unless you specifically request us to do so, or if we wish to share important updates and the addition of new features on Proactive. We will not sell or make available your users' contact or other information to any third parties, aside from what is necessary to provide the Proactive Service.

## Information we collect indirectly or passively

- **Usage data.** Like most software services today, Proactive collects usage data about you whenever you interact with our services. This can include which Proactive areas/pages you visit, what you click on, when you performed those actions, and so on.
- **Device data.** Proactive collects data from the device you use to access our services, such as your IP address, operating system version, device manufacturer and model, and browser type. We may also infer your geographic location based on your IP address.
- **Referral data.** If you arrive at a Proactive website from an external source (such as a link on another website or in an email), Proactive records information about the source that referred you to us.
- **Information from third parties.** Proactive may collect your personal information or data from third parties, if you have given permission to those third parties to share your information.
- **Information from page tags.** Proactive uses third-party tracking services that employ cookies and page tags (also known as web beacons) to collect aggregated and anonymized data about visitors to our websites. This data includes usage and user statistics.

## How Proactive uses collected information

To Proactive, your data is private and owned by you. Proactive does not use your data other than as described in this Privacy Policy unless we have your written consent. We do not sell or make available your app data to third parties, beyond what is necessary to provide the Proactive Service, without your permission.

Proactive may on occasion use system data to provide information to external parties for example for research or statistical analysis. If your data is used in this format, it will be completely anonymised and will not contain any personal or company information without your written consent

The specific ways that Proactive uses collected information are listed below. See the next part of this Privacy Policy to understand how your information may be shared.

## To provide the Proactive Service to you

- Customer support is the most common reason for us accessing your data, since often Proactive will need to view your account, data and users to provide training, advice and troubleshooting.
- Our connectors (“Share a report”) options and any APIs we build give you the option to export and import data between the Proactive Service and other external applications. When using connectors, you may be disclosing your data to the individuals or organisations responsible for operating and maintaining such third-party applications and sites. Proactive does not own or operate the external services that you choose to connect with, and you should review the privacy policies of such external services to

ensure you are comfortable with the ways in which they may use the data you share with them.

## **To manage the Proactive Service**

Proactive may use your account information and app data for these limited, internal-only purposes:

- **To maintain, monitor and enhance the Proactive Service.** We perform internal statistical and other analyses on data we collect, including usage data, device data, referral data, app data and information from page tags, to measure user behaviour and trends, to understand how people use the Proactive Service, and to monitor, troubleshoot and improve the Proactive Service, including to prioritise, plan and evaluate new features. Proactive may use your data for internal-only purposes designed to keep our services secure and operational, such as for troubleshooting and testing purposes, and for service improvement, marketing, research and development purposes.
- **To enforce our Terms of Use.** Occasionally Proactive may need to review data in your account to determine whether there is a breach to our contractual terms.
- **To prevent potentially illegal activities.**
- **To create new functionality, services or content.** Proactive may internally review your app designs and data for the purpose of creating new features, support content or services. Proactive may look at related statistics such as app usage, form entry counts, to publish interesting observations about these for training or marketing purposes. When Proactive does so, neither individual customers nor app users will be identified or identifiable unless we have obtained their permission.
- **To contact you about your service or account.** Proactive may occasionally send you communications of a transactional nature (e.g. service-related announcements, billing-related matters, changes to our services or policies, welcome emails when you first register). You are prevented from opt-out of this type of communication since it is required to provide our services to you.
- **To contact you for marketing purposes.** Proactive will send you promotional emails only if you consent to us contacting you for this purpose. You can opt out of these communications at any time by clicking on the “unsubscribe” link in these emails.
- **To respond to legal requests and prevent harm.** If Proactive receives a legal request, we may need to inspect the data held to determine the appropriate response.

## **Who Proactive shares your data with**

We recognise that you have entrusted Proactive with safeguarding the privacy of your information. Because that trust is extremely important to us, the only time Proactive will disclose or share your personal information or user data with a third party is when Proactive has done one of three things, in accordance with applicable law:

- (a) given you notice, such as in this Privacy Policy.

(b) obtained your express consent, such as through an email or other form of communication; or

(c) anonymised or aggregated the information so that individual persons or other entities cannot reasonably be identified by it. Where required by law, Proactive will obtain your express consent prior to disclosing or sharing any personal information.

We may share:

- **Your data with our sub-processors.** We use third-party service providers (“sub-processors”) to help us provide you with the Proactive Service. Proactive gives these sub-processors access to your data, but only to the extent necessary for them to perform their services for us. Proactive also implements reasonable contractual and technical protections to ensure that your personal information and data remains confidential, is used only for the provision of their services to us and is handled in accordance with this Privacy Policy. Examples of sub-processors include payment processors, web hosting services, email providers, and analytics tools. A list of our sub-processors can be emailed on request.
- **Your email address with your organisation.** If the email address under which you’ve registered your account belongs to or is controlled by an organisation, Proactive may disclose that email address to that organisation to assist the organisation with its Proactive account administration. Don’t use a work email address for the Proactive Service unless you are authorised to do so and are therefore comfortable with this potential disclosure.
- **Aggregated or anonymised data with third parties to improve or promote the Proactive Service.** We ensure that no person can be reasonably identified or linked to any data we may share with third parties for the improvement or promotion of Proactive services.
- **Your data if required or permitted by law.** Proactive may disclose your information as required or permitted by law, or when Proactive believes that disclosure is necessary to protect our rights, protect your safety or the safety of others, and/or to comply with a judicial proceeding, court order, or other legal process served on us.
- **Your information if there’s a change in our business ownership or structure.** If ownership of all or substantially all of Proactive’s business changes, or if Proactive undertakes a corporate reorganisation, including a merger, acquisition or consolidation or any other action or transfer between Proactive entities, you expressly consent to Proactive transferring your information to the new owner or successor entity so that we can continue providing the Proactive Service. If required, Proactive will notify the applicable data protection agency in each jurisdiction of such a transfer in accordance with the notification procedures under applicable data protection laws.

## Your data rights

You can exercise the following rights over the data you store or process on the Proactive Service:

- **Update your account details.** You can immediately update your account information, and that of your users, via the provided organisation and user editing pages.
- **Access and correct personal information.** As an account administrator, you may access and correct certain personal information that Proactive holds about you by visiting the provided user edit page. Some users and other individuals may have certain legal rights to ascertain if we hold personal information about them, to access personal information we hold about them, and to pursue its correction, update, amendment or deletion in appropriate circumstances. Depending on the information involved, these rights may be exercised through the user or organisation edit pages previously mentioned. For all other cases, requests to exercise these rights may be directed to our support team. These rights are subject to some exceptions, such as where executing the request would have an unreasonable impact on the privacy of other individuals. Proactive will respond to requests to exercise these rights within a reasonable time and, where required by law or where we deem it otherwise appropriate and practicable to do so, we will honour your request.
- **Download/backup your app data.** Proactive provides functionality to export your app data in a variety of formats. This allows you to create your own backups or conduct offline data analysis.
- **Cancel your account.** To cancel and delete your account, please contact our support team. Deleting your account will cause all the data in the account to be permanently deleted from our systems within a reasonable time period, as permitted by law, and will disable your access to the Proactive Service. Proactive will respond to any appropriate request to access, correct, update or delete your personal information within the time period specified by law, if applicable, or without excessive delay. Proactive will promptly fulfil requests to delete personal information unless the request is not technically feasible or such data is required to be retained by law, in which case Proactive will anonymise such data instead. When an organisation cancels their account with Proactive, we will provide them with a “Data File” containing all data collected and stored within the Proactive system. It is worth noting that data (such as incident/accident data) may be required by law and should be kept according to statutory requirements.

### **Proactive’s data retention timeframes**

We retain your data for as long as you have an account on the Proactive Service, or to comply with our legal obligations, resolve disputes, or enforce our agreements.

- **Deletion of your Proactive Service account.** You can request our support team to delete your account and all associated data at any time. After you initiate the deletion of your account, the account is disabled immediately, but the account and associated data may be held in our database for a period of up to 90 days. You can contact our support team within that time frame to request the account be restored. After your account is permanently deleted, Proactive won’t be able to restore it or the associated

data. Proactive will provide the named Customer contact with a data file containing all the data collected within reporting carried out on the Proactive system.

- **App user account deleted by an account administrator.** Your nominated administrator users can delete app user accounts at any time. This disables the target user account immediately, but the user and associated data is retained by Proactive until the customer account is cancelled, and the associated data file is provided to the customer.

## Security and other important information

- **Changes to this Privacy Policy.** Proactive may modify this Privacy Policy at any time. Proactive will notify you by publishing the changes on the Proactive website and web app. If Proactive determines the changes are significant, you will be provided with additional, prominent notice as is appropriate under the circumstances, such as via email or in another conspicuous manner reasonably designed to notify you. If, after being informed of these changes, you do not cancel your subscription and continue to use Proactive services, you will be considered as having expressly consented to the changes in the Privacy Policy. If you disagree with the terms of this Privacy Policy or any updated Privacy Policy, you may close your account at any time.
- **Security.** Proactive takes security seriously and we're committed to processing your personal information and data with respect and integrity. However, regardless of the protections and precautions undertaken, there is always a risk that your personal information may be viewed and used by unauthorised third parties because of collecting and transmitting your data through the Internet. If you have any questions about the security of your personal information, contact our support team. Proactive has also published a technical data sheet regarding the main technical information at Proactive.
- **Data locations.** We use NamesCo to host customer accounts and they are named as our data hosting server provider.
- **Cookie Notification.** Proactive and our partners use cookies and similar technologies on our websites. Cookies are small bits of data we store on the device you use to access our services so Proactive can recognise repeat users. Each cookie expires after a certain period of time, depending on what we use it for. Proactive uses cookies and similar technologies for:
  - **For security reasons.** We store your login details in an encrypted cookie to authenticate your identity and to keep you logged into the Proactive Service.
  - We don't believe that cookies are bad, but you can still choose to remove or disable cookies via your browser. Note that if you choose to disable cookies received from our web backend, you will not be able to log in there, since we require cookies to be enabled for the security reasons above. By using our websites and agreeing to this Privacy Policy, you expressly consent to the use of cookies as described in this policy.
- **Blogs and Forums.** Proactive websites may offer publicly accessible blogs and community forums. You should be aware that any information you provide in these

areas might be read, collected, and used by others who access them. Proactive is not responsible for any personal information you choose to submit in these areas of our site. To request removal of your personal information from our blog or community forum, contact our support team. In some cases, Proactive may not be able to fulfil your request and an explanation will be provided. Commenting systems on our blogs may be managed by a third-party application that may require you to register to post a comment. Please review that application's privacy policy to learn how the third party uses your information.

- **Social Media Features.** Proactive websites may include social media features or widgets, such as the Facebook Like button. Use of these features may allow them to collect your IP address, detect which page you are visiting on our site, and set a cookie to enable the feature to function properly. Your interactions with these features are governed by the privacy policy of the third party providing it.
- **Safety of Children.** Proactive services are not intended for and may not permissibly be used by individuals under the age of 16. Proactive does not knowingly collect personal information from persons under 16 or allow them to register. If it comes to our attention that Proactive has collected personal information from such a person, Proactive may delete this information without notice. If you have reason to believe that this has occurred, please contact our support team.
- **English version only.** The English language version of this Privacy Policy is authoritative. Any translations of this policy that we may provide are for convenience only.

### **Notices for European Union and United Kingdom users**

- **Personal data.** For users located in the EU, references to “personal information” in this policy are equivalent to “personal data” as defined in prevailing EU data protection regulations.
- **IP addresses.** Our servers may record the incoming IP addresses of visitors to Proactive websites and services, whether or not the visitor has a Proactive account and store the IP addresses in log files. Proactive uses these log files for purposes such as system administration and maintenance, record keeping, tracking referring web sites, inferring your location, and security purposes (e.g. controlling abuse, spam and DDOS attacks). Proactive may also store IP addresses along with certain actions you take on our system. By agreeing to this Privacy Policy, you expressly consent to Proactive using your IP address for the above purposes. If you wish to opt out from the above consent to use your IP address, you must cancel your account (if you have one) and/or not interact with apps created on the Proactive Service if requested to do so.
- **Data controller.** Proactive is the data controller for registration, billing and other account information that we collect from Proactive Service users in the EU. However, the data controller for all submitted reports and data is the customer (organisations responsible for allocating users to the platform). The customer determines how their information (reports/checklists) are distributed and used. Proactive only processes data in accordance with the instructions and permissions (including those given under



this Privacy Policy) provided by the customer to their users when they create and administer their service to their users.

- **Accessing and correcting your personal data.** You have the right to access and correct the personal information that Proactive holds about you. This right may be exercised by visiting the provided “edit user” pages or by contacting our support team.
- **Your responsibilities.** By using the Proactive Service, you agree to comply with adequate data protection requirements when collecting and using your data, such as requirements to inform respondents about the specific uses and disclosures of their data. As the controller of your data, you are responsible for actioning this consent as and when required.
- Your data is hosted within the EU. Your data will be hosted exclusively within our UK data centres.

### **You are giving the following express consents**

By accessing this Privacy Policy, you expressly consent to the following:

- You consent to the collection, use, disclosure and processing of your personal data in the manner described in this Privacy Policy, including our procedures relating to cookies, IP addresses and log files.
- You consent to Proactive sharing your personal data with relevant persons working for sub-processors and affiliates when necessary to provide the Proactive Service.
- You consent to our use of cookies as described in this Privacy Policy.

## SECTION 2: PRIVACY FOR APP USERS

### How the Proactive Service applies to you

- **Proactive is the processor of your data; your organisation (customer in this policy) is the controller.** Proactive does not sell or share your submitted data with third party advertisers or marketers. Our interaction with any personal information and other data you submit is purely for the purposes of providing the Proactive Service.
- Your organisation controls your data and instructs us on what to do with the data, which we then perform subject to this Privacy Policy, relevant data protection legislation, and our Terms of Use. If you believe that your organisation is violating our conditions of use, please email us with details of the violation.

### Information that Proactive collects

When you interact with our platform including the web app and web-based dashboard powered by Proactive, we collect and process information relating to you and your use of the Proactive Service from a variety of sources, which are listed below, along with details of how we use this information. All collection and processing of such information is on behalf and upon instructions, including the ones provided in this Privacy Policy, of the customer.

### Information Proactive collects directly from you

- **App data.** Proactive collects and stores the app data that you interact with, modify or submit. Your organisation is responsible for this data and manages it. The web app may ask you to provide personal information or data. If you have any questions about this request, please contact your organisation directly, as Proactive is not responsible for the level of use of the web app and does not control your own organisations privacy policies and procedures. Your organisation may have their own privacy policy for you to refer to and you should always adhere to their policy, which will always supersede the privacy policy provided by Proactive.
- **Information about your subjects.** The Proactive app is designed to allow staff (users) to report incidents, hazards, and complete checks. As such it is likely that users will submit personal information (about other non-users) regarding those persons who are involved with or are affected by the incident or hazard. As such users must ensure that the data they submit is done so in line with their organisations privacy policy. Subjects of reports should be made aware of the organisations use of Proactive and should be provided with access to their data in line with the organisations and Proactives privacy policy and processes.

### Information we collect indirectly or passively

- **User account information.** You will usually require a Proactive account before you can access forms or checklists created on the Proactive Service. Your organisation account administrator will normally create your user account, and in doing so will

provide us with your name, and email address. These details are required to provide you with app user access on the Proactive Service.

- **Usage data.** Proactive collects usage data about you whenever you interact with the Proactive Service. This may include which web pages you visit, what you click on, when you performed those actions, and so on. Additionally, as with most websites today, Proactive servers keep log files that record data each time a device accesses those servers. The log files contain data about the nature of each access, including originating IP addresses, internet service providers, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system versions, and timestamps. Note that Proactive does not link this usage data to your submitted app data.
- **Device data.** Proactive collects data from the device you use to access our services, such as your IP address, operating system version, device make and model, performance information, and browser type. Proactive may also infer your geographic location based on your IP address.
- **Referral data.** Proactive may records information about the source that referred you to an app (e.g. a web link or in an invite email).
- **Information from page tags.** Proactive uses third-party tracking services that employ cookies and page tags (also known as web beacons) to collect aggregated and anonymised data about visitors to our websites. This data includes usage and user statistics.

### **How Proactive uses collected information**

- The data from your app interactions is owned and managed by your organisation, and Proactive treats that information as private to the organisation. Please contact the organisation directly to understand how the individual, company or organisation uses your app data.
- Your organisation may provide you with a privacy policy or notice when you use Proactive and we encourage you to review such information to understand how your organisation wants you to access and handle information submitted through Proactive, this same policy would also identify how your organisation will handle your data.
- Proactive does not sell or make available app data to third parties, beyond what is necessary to provide the Proactive Service, without customers instruction and Proactive does not use any contact details collected in our customers' apps to contact persons recorded in said app data.
- Proactive also uses the information collected from you, including usage data, device data, referral data and information from page tags to manage and improve our services, for research purposes, and for the various purposes described in this Privacy Policy.

### **Who Proactive shares your data with**

Proactive will share your app data and interactions with third parties only as described in this Privacy Policy.

## Proactive discloses:

- **Your data to your organisation.** Your app data and interactions (e.g. report submissions) will be provided to the customer. Contact your organisation (customer) directly to understand how they might use your app data.
- **Your data to third parties as necessary to provide the Proactive Service.** Please see Section 1 of this Privacy Policy to understand how Proactive processes app data on behalf of customers, and to whom Proactive may disclose app data.

## Your Data Rights

- **To access and correct your app data and/or personal information, contact your organisation (customer).** Proactive does not control your data, we only collect and processes your data on behalf of organisations. Contact the organisation if you have any questions about their use of Proactive, or if you want to access, update, or delete anything in the app data you have provided. Proactive provides organisations with tools to maintain the data they collect through their reports You may request access to and correction of the personal information we hold about you by contacting customer support, and Proactive will respond to your request for access or correction within a reasonable time and, where reasonable and practicable to do so, Proactive will provide access to your personal information in the manner requested by you. However, in most cases Proactive cannot provide you with this access or correction, since app data is owned by your organisation, and giving you access may conflict with this ownership or have an unreasonable impact on the privacy of other individuals.
- **Opt out of using Proactive-powered apps.** Your use of Proactive-powered apps is voluntary and can be stopped at any time by you. Note that your employer or organisation may require you to use Proactive-powered apps as part of your activities for them, in which case you will need to address your concerns about Proactive-powered apps to them.

## Security and other important information

- **Changes to this Privacy Policy.** Proactive may modify this policy at any time and you will be notified by publishing the changes on this website. If Proactive determines the changes are significant, you will be provided with additional, prominent notice as is appropriate under the circumstances, such as via email or in another conspicuous manner reasonably designed to notify you. If, after being informed of the changes, you continue to use the Proactive Service, you will be considered as having expressly consented to the changes in our Privacy Policy. If you disagree with the terms of this Privacy Policy or any updated Privacy Policy, you may request your account be deleted by your organisation administrator, or by contacting our support team.
- **Security.** Proactive takes security seriously and we're committed to processing your personal information and data with respect and integrity. However, regardless of the protections and precautions undertaken, there is always a risk that your personal information may be viewed and used by unauthorized third parties because of

collecting and transmitting your data through the Internet. If you have any questions about the security of your personal information, contact our support team.

- **Data locations.** We use NamesCo to host customer accounts and they are named as our data hosting server provider.
- **Cookie Notification.** Proactive and our partners use cookies and similar technologies on our websites. Cookies are small bits of data we store on the device you use to access our services so Proactive can recognise repeat users. Each cookie expires after a certain period, depending on what we use it for. Proactive uses cookies and similar technologies for:
  - **For security reasons.** We store your login details in an encrypted cookie to authenticate your identity and to keep you logged into the Proactive Service.
  - We don't believe that cookies are bad, but you can still choose to remove or disable cookies via your browser. Note that if you choose to disable cookies received from our web backend, you will not be able to log in there, since we require cookies to be enabled for the security reasons above. By using our websites and agreeing to this Privacy Policy, you expressly consent to the use of cookies as described in this policy.
- **Blogs and Forums.** Proactive websites may offer publicly accessible blogs and community forums. You should be aware that any information you provide in these areas might be read, collected, and used by others who access them. Proactive is not responsible for any personal information you choose to submit in these areas of our site. To request removal of your personal information from our blog or community forum, contact our support team. In some cases, Proactive may not be able to fulfil your request and an explanation will be provided. Commenting systems on our blogs may be managed by a third-party application that may require you to register to post a comment. Please review that application's privacy policy to learn how the third party uses your information.
- **Social Media Features.** Proactive websites may include social media features or widgets, such as the Facebook Like button. Use of these features may allow them to collect your IP address, detect which page you are visiting on our site, and set a cookie to enable the feature to function properly. Your interactions with these features are governed by the privacy policy of the third party providing it.
- **Safety of Children.** Proactive services are not intended for and may not permissibly be used by individuals under the age of 16. Proactive does not knowingly collect personal information from persons under 16 or allow them to register. If it comes to our attention that Proactive has collected personal information from such a person, Proactive may delete this information without notice. If you have reason to believe that this has occurred, please contact our support team. This section is different to the information that is provided below which refers to information you submit about children through the system.
- **Information provided about children.** By its nature Proactive may involve the gathering of data about young people, this may be in the form of incident reporting which is obviously sensitive information. Users must ensure that they are aware of the

data protection policy from their organisation and any special provision for the gathering and sharing of data of young people. This data should be monitored more closely, and Proactive will ensure that our systems are designed to maintain the safety and security of this sensitive data.

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### **Notices for European Union and United Kingdom users**

- **Personal data.** For users located in the EU, references to “personal information” in this policy are equivalent to “personal data” as defined in prevailing EU data protection regulations.
- **IP addresses.** Our servers may record the incoming IP addresses of visitors to Proactive websites and services, whether the visitor has a Proactive account, and store the IP addresses in log files. Proactive uses these log files for purposes such as system administration and maintenance, record keeping, tracking referring web sites, inferring your location, and security purposes (e.g. controlling abuse, spam and DDOS attacks). Proactive may also store IP addresses along with certain actions you take on our system. By agreeing to this Privacy Policy, you expressly consent to Proactive using your IP address for the above purposes. If you wish to opt out from the above consent to use your IP address, you must cancel your account (if you have one) and/or not interact with apps created on the Proactive Service if requested to do so.
- **Data controller.** Proactive is the data controller for registration, billing and other account information that we collect from Proactive Service users in the EU. However, the data controller for all app data is the organisation that assigns use of the Proactive platform. The organisation determines how their accounts are designed, distributed and used. Proactive only processes app data in accordance with the instructions and permissions (including those given under this Privacy Policy) configured by the organisation when they create and administer their accounts.
- **Accessing and correcting your personal data.** You have the right to access and correct the personal information that Proactive holds about you. This right may be exercised by visiting the provided “edit user” pages controlled by your organisation or by contacting our support team.
- **Your responsibilities.** By using the Proactive Service, you agree to comply with adequate data protection requirements when collecting and using your app data, such as requirements to inform respondents/subjects of reports about the specific uses and disclosures of their data.
- **Your data is hosted within the EU.** Provided your organisation has specified the United Kingdom or an EU country as your organisation’s location at signup for the Proactive Service, and then your data will be hosted exclusively within the UK.

## **You are giving the following express consents**

By accessing Proactive you are indicating your acceptance of this Privacy Policy, you expressly consent to the following:

- You consent to the collection, use, disclosure and processing of your personal data in the manner described in this Privacy Policy, including our procedures relating to cookies, IP addresses and log files.
- You consent and agree that Proactive and our various affiliates and sub-processors may process your data in countries, which do not have data protection laws that provide the same level of protection as in European Economic Area countries. Proactive commits to having contracts in place with these affiliates and sub-processors that include similar requirements as prevailing EU data protection legislation. Your consent is voluntary, and you may revoke your consent by opting out at any time. If you opt-out, we will no longer be able to provide you with the Proactive Service.
- You consent to Proactive sharing your personal data with relevant persons working for sub-processors and affiliates when necessary to provide the Proactive Service.
- You consent to your information being accessed and shared with the 'Customer' detailed in this document and for whom the service is provided. Please refer to your organisations own privacy policy for details of how they will handle your data
- You consent to our use of cookies as described in this Privacy Policy.