



# Privacy Statement

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## 1 Who We Are

TransVault Software (“TransVault”) develops and operates advanced proprietary solutions that allow businesses to migrate, manage, and obtain unique and valuable insights into their data and Microsoft Office 365 and Azure environments, with the goals of making them more productive and helping them meet compliance needs.

TransVault is a trading division of SevernSoft Limited, company number 01870663, headquartered in the UK.

## 2 Introduction

TransVault is committed to protecting your privacy.

This privacy statement explains what personal data TransVault collects, processes and shares when you use our website, consent to share information with TransVault at industry events or use TransVault solutions.

Below is more information.

## 3 Data Collected

### WEB SITE

When using this website (or visiting us at events), you may consent to share the following information with us:

- Your first and last name
- Your company
- Your job title
- Your business email address – if you use a personal email, we will seek to amend this to a business email address where possible
- Your business phone number
- Project related information – e.g. archive migration platforms & volumes
- Business address information – city, state/county/province, ZIP/Postal code, country
- Information about your core business – reseller, professional services etc.

**IMPORTANT:** The personal information we collect does not typically exceed what would appear on your company business card. We do not collect or store any high risk personal data (e.g. credit card details or passwords) or sensitive personal data.

Furthermore, we are the sole owners of any information collected. We will not sell or rent this information to anyone.

#### **How we use your data**

The personal information you provide is used expressly for:

- **Responding to your requests and providing customer service** – The data collected from enquiry forms or email enquiries will only be shared with another party with your consent or as necessary to provide any solution information you have requested. For example, TransVault does not sell its email archive migration software directly. This means that in order to respond to your request, we may need to share your data with an authorized TransVault Partner. Your data will be stored in our Customer Relationship Management (CRM) system. This is to ensure you are serviced in a professional and expedient way.
- **Keeping you updated:** Where you've given us permission, we will send occasional marketing emails featuring technical insights and event invitations relating to the solutions and subject areas covered in this website. This information is held on our Active Campaign marketing platform. You can stop our marketing communications at any time, upon which your details will be deleted.
- **Improving our website.** To improve the layout of our web content and make life easier for you (e.g. by pre-filling forms if you've previously visited our site) we use certain cookies. *See section on Cookies below.*

See also the section entitled [Your Rights and Requests](#).

## Cookies

When using this website we automatically collect data about you via Cookies. Cookies help us to provide a better digital service for you by delivering additional digital services to you (such as the Chat feature), as well as information about site usage. Types of information we gather via use of Cookies when you use this site (not limited to):

- Location
- Browser
- Platform
- Device
- IP Address
- Hostname
- User Agent
- Past Visits
- Past Chats
- Time on Site

The personal information we collect automatically on this site using cookies:

- Is only ever collected and stored by the system in question, it is not moved, processed or shared anywhere else, and only the TransVault employees responsible for running the service have access to it – it is not stored on our CRM system, for example, or inform any of the ongoing Sales or Marketing communications we might have with you in the future
- Is only used to provide and improve site services, such as our Chat service.

## Third-party data processors

Active Campaign – (Privacy Policy) Active Campaign is a third-party data processor and is used to manage our enquiry forms and newsletter subscriptions. If you have subscribed to our email updates, your email address will remain within Active Campaign's database until you specifically request removal from the list although we periodically review how long we retain data.

ZenDesk Chat (Privacy Policy) To provide real-time responses to your queries we ask that you provide your contact details in advance. These may be pre-filled to make life easier for you.

LinkedIn, Twitter, YouTube and other social networks These services provide social buttons and similar features which we use on our website – such as the “Share on LinkedIn” and “Tweet” buttons. To do so we embed code they provide, and that we do not control ourselves. For sharing functionality to work, these social network companies use your social profiles and you must be logged in. Your login details and other personal social network details are not shared with us at any given time, nor do we control how those networks use it. Social networks, therefore, could know that you’re viewing this website if you use their services (that isn’t to say they do, but their policies may change).

## PLATFORM

As a provider of Services, TransVault may receive, process or store certain information, including personal information, on behalf of our Clients.

The data TransVault collects will include, but is not limited to, data that is made available by Microsoft’s services, Client’s systems on which our software is installed, and any other third-party service for which the Client requires TransVault to provide the service.

This data may include information from the end points and other systems, tools or devices that Clients manage or monitor using our Services, and end user data related to individual’s activities on Client’s network and systems.

It may also include event logs, end user information (such as IP address, email address and computer name), and other data where relevant to a support service request or to facilitate improvement of the Platform.

Client understands that TransVault, in performing the required technical steps to provide the Service, may process the Client Data over a public or private network and will take due care to treat that data in accordance with generally accepted good practice.

## 4 Data Protection

In agreeing to our Terms of Service (see separate document), the Client confirms that it is the Data Controller for the information for which TransVault will be a Processor with respect to EU data protection law and other relevant legislation.

Client further confirms and warrants to TransVault that the Client has all the rights, power and authority necessary to grant the above rights and that use of the Client Data will not breach the rights of any third party.

- TransVault represents, warrants and covenants that it will treat all Client Data in accordance with TransVault’s applicable privacy policies, privacy statements and applicable law.
- TransVault will not use, sell, rent, transfer, distribute or otherwise disclose or make available Client Data for TransVault’s own purposes or for the benefit of any person or entity other than Client without Client’s prior written consent expressly authorizing the specific use and/or disclosure.
- TransVault shall notify Client of any unauthorized access or other data breach involving Client Data.

## 5 Breach

We will report any unauthorised data breach of this website's database or the database(s) of the TransVault Platform to any and all relevant persons and authorities within seventy four (72) hours of the breach if it is apparent that personal data stored in an identifiable manner has been copied or removed.

Client is responsible for all use of the Platform and Client Data by its End Users, and for their compliance with this Agreement. Any breach of this Agreement by such End Users (e.g. if the End User misappropriates, loses, discloses, or compromises the security of your data on this Platform) shall be deemed to have been a breach by Client.

## 6 Relevant Legislation

Along with our business and internal computer systems, this website the TransVault Platform are designed to comply with the following national and international legislation with regards to data protection and user privacy:

- UK Data Protection Act 1988 (DPA)
- EU Data Protection Directive 1995 (DPD)
- EU General Data Protection Regulation 2018 (GDPR)

Compliance with the above legislation, all of which are stringent in nature, means it is likely to be compliant with the data protection and user privacy legislation set out by many other countries and territories as well.

If you are unsure about whether this site or the TransVault Platform is compliant with your own country of residences' specific data protection and user privacy legislation you should contact us for clarification.

## 7 Your Rights and Requests

- Right to rectification – You can request that we edit any information at any time by emailing us at [DPO@TransVault.com](mailto:DPO@TransVault.com).
- Right to be forgotten – After receiving a request to be forgotten, as long as TransVault does not require retention of any or all of the information specified under grounds of Legitimate Business Interest (such as for accounting and support purposes), we will permanently delete your record and all data associated with it within 30 days of receiving the request. If the request requires further clarification or cannot be fulfilled in full, we will notify you, again within 30 days of receiving the request.
- Right of portability – If requested, we will export your data so it can be transferred to a third party.
- Right to object – At any time, you may object (via opt-out) to your personal data being used for specific purposes such as direct marketing.
- Right of access – We're transparent about the data we have and how we use it. You can contact us at any time if you'd like to access to your data or if you have any questions about your data and how we're using it.

## 8 Any Questions?

If you have any questions about this privacy policy or your personal data, please write to us by email to [DPO@TransVault.com](mailto:DPO@TransVault.com).

## 9 Updates to this Policy

We may update this privacy policy from time-to-time, particularly as technology changes. We will notify you of any changes to our privacy policy by email.