



## Privacy Policy

We are **GlobeISMS Ltd.**, Our primary business is to provide security and compliance management services to client organizations.

Our primary business is “Managed Cybersecurity Services”.

This means that we process information given to us by other parties. In order to do this, we enter contracts with organizations. And it is those organizations (the “**Organization**”) that control the personal data and have responsibilities to you as the *data controller*. We are also under obligations to ensure your data is processed properly.

When acting as the data ‘Processor’ we are provided with the following personal data by the ‘Organization’ we are contracted to;

Name  
Email address  
Mobile number  
Address (if present)

It is important you have read and understood the Organization’s privacy policy and please contact the Organization for more details about the terms upon which we process data on their behalf.

Where we directly control your data, for example enquiry forms on Our Website, we set out details below.

### **SO WHAT IS THIS DOCUMENT?**

This document is called a ‘Privacy statement’ and this tells you how We use personal data We process. In places this document also clarifies how We treat personal data that We process on behalf of other Organizations.

Please read this document carefully to understand our views and practices regarding your personal data and how We will treat it. By visiting <https://www.globelms.com> and/or by downloading and using our app, you are accepting and consenting to the practices described in this policy.

For the purpose of the Data Protection Act 2018 (and any successor or replacement legislation) (the **Act**), the data processor/controller is **GlobeISMS Ltd.** You can contact Our Group Data Protection Officer at [dpo@globeisms.com](mailto:dpo@globeisms.com)



## INFORMATION WE PROCESS ABOUT YOU AS A DATA PROCESSOR

In order to access our software (the **Service**), users must confirm the following information to validate their identity (**Login Details**) and create an account:

- a. Email address – Account ID
- b. Full Name (First name and given name)

They must then create a user defined Password in order to access the service.

## INFORMATION WE PROCESS ABOUT YOU AS A DATA CONTROLLER

- **General information you give us.** This is information that you give us by filling in enquiry forms on our website (**our site**) or using our support services. The information you give us may include your name, address, e-mail address and phone number and other information.
- **Information We collect about you.** With regard to each of your visits to our site or our app We will automatically collect the following information:
  - **Technical Information.** Including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
  - **Location information.** We may also use GPS technology to determine your current location. Some of our location-enabled services require your personal data for the feature to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose. You can withdraw your consent at any time by disabling location sharing services on your device.
  - Information about your visit, including the full Uniform Resource Locators (URL).

## WHY DO WE HAVE YOUR DATA?

We provide an engagement platform allowing educational material and compliance validation and review process for third party organization. If you use the Service we require Login Details in order to authenticate your access to the Service.

We also process a range of personal data as part of the Service. This is processed for the functionality of the Service We are providing, as We are obliged to do so under a contract with an organization, and We do so with a legitimate business interest.

All information given is held on our servers located in an ISO27001 accredited data center. We are also SOC2 and HITRUST accredited and have in place a stringent security policy covering all aspects of information management and continuously review and audit our processes.

The following security measures shall be implemented by the Processor, as a minimum:

- Data encryption in transit
- Data encryption at rest

- Role-based access control
- Multi-factor authentication
- Regular backups
- Monthly 3rd party vulnerability scanning
- Intrusion detection system
- Intrusion prevention system
- Firewall protection
- Anti-virus on all IRIS Software Group computers and laptops
- Business continuity plan

#### **HOW LONG DO WE HOLD YOUR DATA FOR?**

The information we store from you is held for the following lengths of time:

- **GlobeISMS Account Data** – Your data will be held whilst you have a connection to an organization.
- In the event that you have no connection as a staff user for a period of 30 days or more, your user data will be automatically deleted. Your User data will also be removed if you delete your own account.
- **General Information You Give Us**. – Data collected as part of completion of an enquiry form etc. is held for a maximum period of 24 months and will only be used for marketing communications where consent, at the time of submitting the form via the website (Our Site), is provided.
- As a staff of a third-party organization, you should be contacting your organization for support in the 1<sup>st</sup> instance. Any data collected through app store reviews will be held on the respective stores for the life span of the app
- **Payment Process** – Information collected for the Know Your Customer (KYC checks) process are retained, as required by respective laws and regulation for each country, generally for a minimum of 7 years.

#### **COOKIES**

Our website and app use cookies to distinguish you from other users. This helps us to provide you with the most effective experience when you browse our website and allows us to improve our site. For detailed information on the cookies We use and the purposes for which We use them see our Cookie Policy at <https://www.globeisms.com>.

#### **USES MADE OF THE INFORMATION**

We use information held about you in the following ways:

- **Information you give to us.** We will use this information:
  - to carry out our contractual obligations to perform the Service and as part of a legitimate business purpose;
  - to notify you about changes to our service;
  - to ensure that content from our site is presented in the most effective manner



for you and for your computer or device.

- **Information We collect about your device.** We will use this information:
  - to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
  - to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
  - to allow you to participate in interactive features of our service, when you choose to do so;
  - as part of our efforts to keep our site safe and secure;
- **Information We receive from other sources.** We will combine this information with information you give to us and information We collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information We receive).

#### **DISCLOSURE OF YOUR INFORMATION**

In order to provide the service to educational organizations and users (such as staff users and parents) we use the following selected third parties or sub processors. The information provided is only that is necessary to provide the service.:

- AWS SES - Email Sending Service where we provide email address
- Reach, AQL - SMS Sending services where we provide mobile number
- HSBC and PayPal - Payment processing services where we provide email address and name

There may be other instances it may be necessary to disclose information. For example:

- In the event that We sell or buy any business or assets, in which case We may disclose your personal data to the prospective seller or buyer of such business or assets.
- If We or substantially all of our assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If We are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use.

#### **WHERE WE STORE YOUR PERSONAL DATA**

The data that We collect from you will not be transferred to, and stored at, a destination outside your region. We use AWS to only store user data in their respective regions by default. As an Example, all US user's data are stored at Amazon data centers in the US, and all EU users data are stored in data centers in the European Economic Area ("EEA"). By submitting your personal data, you agree to this data storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.



All data stored within the GlobeISMS systems shall be stored in an encrypted format using hash algorithms (AES256 or stronger) ensuring that your data is secure.

All information you provide to us is stored on our secure servers. All interactions with the GlobeISMS service including payment transactions will be encrypted using SSL technology. Where We have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password safe and confidential. We ask you not to share a password with anyone.

#### **YOUR RIGHTS**

As a user, you have the right to ask us not to process your personal data for marketing purposes. We will inform you (before collecting your data) if We intend to use your data for such purposes or if We intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms We use to collect your data. You can also exercise the right at any time by contacting us at [dpo@globeisms.com](mailto:dpo@globeisms.com).

As a user, please contact your organization directly for any data subject rights.

Our service may, from time to time, contain links to websites requested by the organizations we contract with. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that We do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

#### **ACCESS TO INFORMATION**

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act.

#### **CHANGES TO OUR PRIVACY POLICY**

Any changes We make to our privacy policy in the future will be posted on <https://www.globeisms.com>

Please check back frequently to see any updates or changes to our privacy policy.

#### **CONTACT**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [dpo@globeisms.com](mailto:dpo@globeisms.com).