

Locana Privacy Policy

Introduction

Locana respects your privacy and is committed to protecting your personal data. This privacy policy will inform you how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below.

Important Information and Who We Are

Purpose of this Privacy Policy

This privacy policy aims to give you information on how Locana collects and processes your personal data through your use of our website at <https://www.Locana.co> or otherwise in the course of your dealings with our business. This policy is designed to fulfil our transparency obligations under the General Data Protection Regulation and the UK Data Protection Act 2018 (together, “**UK/EEA Data Protection Laws**”) with regard to individuals we deal with in the course of our business (excluding our employees, contractors and other staff members).

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

Locana is made up of Locana LLC in the United States of America (whose registered office is located at 8400 East Crescent Parkway, Suite 600, Greenwood Village, CO 80111 and Locana U.K. Limited in the United Kingdom (whose registered office is located at Spaces Covent Garden, 60 St Martins Lane, London, WC2N 4JS) (together, the “**Locana Group**”). This privacy policy is issued on behalf of the Locana Group so when we mention Locana, “we”, “us” or “our” in this privacy policy, we are referring to the relevant company in the Locana Group responsible for processing your data. Locana LLC is the controller in respect of personal data collected via the website at <https://www.Locana.co>.

We have appointed a data protection officer (“**DPO**”) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise *your legal rights*, please contact the DPO using the details set out below.

Contact Details

If you have any questions about this privacy policy or our privacy practices, you can contact our DPO using the following details:

Email address: dpo@Locana.co

Postal address: 1430 Summit Ave Suite 100C, Seattle, WA 98122

Right to Make a Complaint

Individuals in the UK have the right to make a complaint at any time to the Information Commissioner's Office (“**ICO**”), the UK supervisory authority 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.

Changes to the Privacy Policy and Your Duty to Inform Us of Changes

We keep our privacy policy under regular review. This version was last updated on 2021-05-06, Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

The Data We Collect About You

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes your name and title, the name of your employer, your job title, and the location of your office;
- Contact Data includes your email address and telephone number and the address of your office;
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website;
- Usage Data includes information about how you use our website and services; and
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

If You Fail to Provide Personal Data

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 a contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

How is your personal data collected?

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your Identity and Contact by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - receive or request services from us;
 - subscribe to our service or publications;
 - request marketing to be sent to you; and
 - give us feedback or contact us;
- Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [cookie policy](#) for further details.
- Third parties or publicly available sources. We will receive personal data about you from various third parties and public sources as set out below.
 - Conferences
 - Partner organizations
 - Publicly Available Social Media Platforms
 - Location-enabled (IP Address) web marketing platforms (<https://www.hubspot.com>)

How We Use Your Personal Data

In situations where UK/EEA Data Protection Laws apply, we will only use your personal data when UK/EU Data Protection Laws allow us to. Most commonly, we will use your personal data where:

- we need to perform a contract we are about to enter into or have entered into with you or the organization you work for;
- it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and/or
- we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data in the UK or EEA. You may withdraw consent to receiving marketing information from us at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To provide services to you or the organization you work for	(a) Identity (b) Contact	(a) Performance of a contract with you or the organization you work for (b) Necessary for our legitimate interests in conducting our business
To manage our relationship with you which will include: (a) notifying you about changes to our terms or privacy policy (b) responding to communications with you	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to communicate with our customers and suppliers, keep our records updated and to study how customers use our services)
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Usage (d) Marketing and Communications (e) Technical	Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

We may send marketing communications to you if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing.

Where you are based in the UK or EEA, we will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you **or** by contacting us at any time via info@locana.co.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [cookie policy](#).

Change of Purpose

Where UK/EEA Data Protection Laws apply:

- we will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us; and
- if we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of Your Personal Data

We may share personal data which is covered by UK/EEA Data Protection Laws with the parties set out below for the purposes set out in the table above.

Internal Third Parties: other companies in the Locana Group acting as joint controllers or processors and who are based in the U.S. and UK and provide HR, IT and system administration services and undertake leadership reporting.

- Service providers acting as processors] based in U.S. and UK who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in United Kingdom and United States who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Specific third parties such as <https://www.hubspot.com>.
- 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.

Where UK/EEA Data Protection Laws apply, we require all third parties to respect the security of your personal data and to treat it in accordance with the law; and we do not allow our third-party service

providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International Transfers

We may share your personal data within the Locana Group. This will involve transferring your data outside the UK.

Many of our external suppliers and third party business partners are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.

Whenever we transfer personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring that:

- the transfer is to one of the countries that have been deemed to provide an adequate level of protection for personal data by the UK ICO; or
- we use specific contracts approved by the UK ICO (which may be those approved by the European Commission) which give personal data the same protection it has in the UK.

Similarly we comply with European laws to the extent that they apply in relation to international data transfers. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK or EEA.

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data Retention

How long will you use my personal data?

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 unauthorized 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.

By law we have to keep basic information about our customers (including Contact and Identity Data) for up to seven years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see *your legal rights* below for further information.

In some circumstances we will anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Your Legal Rights If You Are a UK or EEA Resident

If you are resident in the UK or EEA you have the right, under certain circumstances, to:

- 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. You also have the right to object where we are processing your personal data for direct marketing purposes. 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; or
 - 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; and
- 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.

Your Legal Rights If You Are a State of California Resident

If you are resident in the State of California you have the right, under certain circumstances, to:

- The right to know The California Consumer Privacy Act (CCPA) grants consumers rights to know what personal information a business sells, discloses or collects about them as well as the categories of third parties who purchased or received their data. Consumers have the right to request a copy of the data that has been collected from them;
- The right to deletion Under the CCPA, consumers can request that a business delete any of the personal information that has been collected from them;
- The right to opt-out Consumers are given the right to opt-out of the sale of their personal information, and the CCPA prohibits businesses from discriminating against consumers that exercise their opt-out rights;

If you wish to exercise any of the rights set out above, please contact us.

No Fee Usually Required

If you are resident in the UK or EEA 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.