

Actual Intelligence Supported by Artificial Intelligence [®]

PRIVACY POLICY – PEBBLE

Thank you for trusting Pebble (**we, us** or **Pebble**) to be responsible for your personal data, which we want you to know that we take seriously.

This privacy policy (**policy**) informs you about how we look after your personal data when you interact with us as one of our customers or suppliers (or as an employee or representative of same), visit us at our premises, visit or use our websites including (regardless of where you visit them from) <https://www.usepebble.com/> (our **websites**) or any of our software applications (or components thereof) such as our project based collaborative learning software application Pebble [®] (**Pebble**), which you may access and use on a software as a service basis (the **Software Services**).

Any data that we collect through Pebble, or generally when providing you with our other paid services (the **Services**), shall be known as the **Customer Data**, and any data collected specifically through the Software Services known as the **Pebble Data**.

It also informs you how we will look after your personal data when, and about your privacy rights and how the law protects you. It does not cover any third party website you have used to access our websites or the Software Services or any third party websites that you access from them.

It applies to all processing of personal data undertaken by Pebble other than processing of internal company personal information in the context of recruitment and employment, which is dealt with under separate internal policies.

It is important that you read this policy so that you are fully aware of how and why we are using your data.

This policy also includes the general cookies and similar technologies policy for the Pebble website and Software Services at Appendix 1 below.

Before using the Software Services, if you are a student or an academic user:

- a) your Educational Institution will need to have paid for access to the Services on the basis of our standard customer terms (available here) [\[https://www.usepebble.com/general-terms\]](https://www.usepebble.com/general-terms) or entered into another written agreement with us, and
- b) if you are a student, you will need to have agreed our terms for student users, available here. [\[https://www.usepebble.com/legal-students\]](https://www.usepebble.com/legal-students)

If you represent or are acting on behalf of an external business user, using Pebble to collaborate on projects for your business with educational institutions and students, you will have to have agreed our terms of use for businesses, available here. [\[https://www.usepebble.com/legal-business\]](https://www.usepebble.com/legal-business)

You will also be required to confirm your acceptance of this policy.

1. WHO WE ARE

1.1 Contact Details

Our full details are:

Full Name of Legal Entity: Pebble (PBL) Ltd

Postal Address: 34 Grafton Street, Londonderry, Northern Ireland, BT48 0ER

- 1.2 Under the UK General Data Protection Regulation or the EU General Data Protection Regulation (collectively **GDPR**) and other relevant data protection legislation, we act as both a data controller (i.e., where we make decisions) in relation to your personal data that we collect, as well as a data processor (i.e., where we process data broadly in accordance with your instructions).

When we act as a Data Processor: When as a user you use the Software Services to process personal data (either on your own behalf, or on behalf of any business or educational institution), or we process personal data on your behalf, whether through our provision of the Services to you or otherwise, we act as a data processor. Under these circumstances, you (either individually or on behalf of your organisation) may act as a data controller or data processor yourself, and we will act as either a processor or a sub-processor. Whenever we act as a processor, or a sub-processor, we will be restricted in the manner and purpose for which we can use

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personal data (including where applicable in the manner outlined in this policy or in our written contract with you) and we will also be subject to other obligations under data protection legislation.

When we act as a Data Controller: By contrast, when we collect personal data and determine the purposes and means of processing that personal data – for example, when we store account information for Pebble user account registration, administration, services access, or contact information as explained below – we act as a data controller.

1.3 Third-Party Links

Our websites and the Software Services may include links to third-party websites, widgets, plug-ins and applications (including social media platforms or other accounts you may have with your educational institution). Clicking on those links or enabling those connections may allow third parties to collect or share data about you or allow you to import data from those third party applications or websites into the Pebble platform.

We do not control these third-party websites or applications and are not responsible for their privacy statements, although we have attempted to provide some high level details in relation to third party platforms with which our website and platform integrates in Appendix 1. When you leave our website or application, we encourage you to read the privacy policy of every third party website or application you visit.

2. WHAT KIND OF PERSONAL DATA DO PEBBLE PROCESS?

INFORMATION YOU SUPPLY TO US

- 2.1 General personal data** - This is personal information about you that you share with us by online forms on our website, through email, through the post, on the telephone, when you apply for and register to use the Software Services, when you complete customer surveys or enter promotions or competitions, create an account on our website, subscribe to our publications, engage with our customer services team, engage Pebble to provide Services, or by any other means.

Typically, when you generally interact with Pebble you may provide information about yourself, as well as other data about your business, including your full name, title, username or similar identifier, , job title, billing address, business name, personal and/or business email address, telephone and/or mobile phone number and other contact details.

Pebble Data:

When you sign up to use the Software Services you will be required to provide your name, username, password, email address, alongside other non-personal details such as language preferences.

However, if you are a student user, whilst we will securely store your email address in connection with your account, you will typically only be identifiable on the Pebble platform through your chosen handle or username, rather than on an individual basis.

You will also provide personal data when you report any technical or service issues in relation to our websites or Pebble, including relevant notes about any issues and how we responded to resolve these, as well as details of any payments or orders you have made through our websites.

When using the Software Services you may also, but are not required to, upload other personal data relating to yourself or others, including through the free text files and photo upload functionality, such as your or third party's phone numbers, names (including signatures), addresses, emails or other contact information.

Where you are sharing personal data that does not directly relate to you, or where you use third party websites or applications to import detail into the Pebble platform, you must ensure you have the consent or other lawful basis to do so under relevant data protection or privacy law, and have shared this policy with that person/those people (where applicable), including where you are acting to register other individuals on their behalf, and in accepting this policy and our associated terms of service (as set out above), you accept and acknowledge on behalf of both yourself and the business on whose behalf you are using Pebble that you will do so.

- 2.2 Financial Details:** Where you use the Software Services and provide us with your financial details in order to facilitate payments by you to us (as an educational institution), we may collect financial details.

Where you have separately provided us with your bank account details and we have issued invoices manually, these will be kept securely.

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- 2.3 Transaction Data:** This includes details about payments to and from you and other details of products and services you have purchased from us.
- 2.4 Verbal Information:** If you provide verbal personal information that you give us consent to use you will have such consent confirmed back to you in writing.
- 2.5 Marketing Information:** You may also communicate your preferences in receiving marketing from us and our third parties and your communication preferences (including details you provide when you opt-in to receive marketing communications from us).

IF YOU FAIL TO PROVIDE PERSONAL DATA

- 2.6** 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 the Software Services or allow you to utilise their full functionality).

PERSONAL DATA WE COLLECT

- 2.7 Telephone or Video-Conference Recordings:** Telephone conversations or calls occurring via video conferencing facilities (including MS Teams) may be recorded for training or monitoring purposes. We will obtain your consent to such recording prior to doing so.
- 2.8 Webinars:** We may from time to time organise and record webinars, which we upload to our website for promotional and educational purposes. If you are a participant to a webinar, the recordings may contain your personal data in the audio or video footage, including names or usernames as they appear on screen and your image (if you have made these available), or details of any questions you may ask. We will inform you prior to joining the webinar whether it is being recorded and we will ask for your consent to this data collection. If you do not consent, you will not be able to participate.
- 2.9 Technical Data from our Websites:** We use certain technical services to gather technical data online whenever you use our websites as detailed in Appendix 1 below. If you are not logged into the Software Services, we collect only very limited technical data through our websites (and you would not be personally identifiable from such data in any event).

PERSONAL DATA WE RECEIVE FROM THIRD-PARTIES

- 2.10 Device Data:** analytics providers such as Google Analytics based in the EU or UK.
- 2.11 Payment Data:** contact, financial and transaction data from providers of technical, payment and delivery services such as Stripe based in the EU or UK, where you make payments to us for Software Services. For clarity, the Software Services do not currently facilitate the conduct of transactions between users or third parties on Pebble itself, but we may facilitate means to assist businesses making payments of gift cards to students for project assistance provided.
- 2.12 Social Media:** publicly available information through social media sites, such as LinkedIn, X or similar. This includes where you have responded to any post made by us through social media facilities, in which case we may receive profile information about you which can include your name, address, telephone number(s) and/or your business contact details. This information would be used to respond to your interest, to fulfil a request from you and/or to send you future information, where you have given us consent to do so.
- 2.13 Publicly Available Information:** If you are, or represent, a Pebble customer, we may collect personal information about you from other publicly available sources. This can include your name, address, and other publicly available information, or information about your company. This may include public registers such as the Companies House registry, the Electoral Register, and so on.

You hereby consent to our collecting and storing all such data about you.

- 2.14 Special Category or Sensitive Data:** Through the Software Services, users may collect, store and process personal data about you. As noted below, we have requested that no sensitive or special category personal data are processed by users through or via the Software Services, but otherwise we do not control or monitor users use or processing of personal data through the Software Services.

IMPORTANT – PLEASE NOTE: Our relevant terms require all users to refrain from uploading or processing any data using the Software Services in violation of applicable laws, including not to process any personal data

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without valid legal grounds (as noted above in Section 1.1), not to process any sensitive or special categories of data (such as information subject to PCI compliance standards, medical data, information about religious or political affiliations etc) and not to infringe any third party's other rights using the Software Services.

We require all of users to agree to adhere to these terms at all times, but do not actively monitor content uploaded or processed using the Software Services and are not responsible for enforcing those terms. If you are reviewing this policy because you believe your or your organisation's data has been used in violation of those terms, please contact us.

- 2.15 Other:** from time to time, we may receive personal information from other sources. We will always endeavour to ensure such information is provided from reputable sources, who are GDPR compliant to do so.

KEEPING YOUR PERSONAL DATA UP TO DATE

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

3. WHAT INFORMATION IS NOT COLLECTED?

- 3.1** We do not intentionally collect sensitive personal data or special category data (including details about your race or ethnicity, religious or philosophical beliefs, medical information, sex life, sexual orientation, political opinions, trade union membership, genetic and biometric data, social security numbers). Nor do we collect any information about criminal convictions and offences.
- 3.2** As noted above, our Terms of Service include restrictions on any users using the Software Services to collect such data (or financial information) but as noted we do not proactively monitor this, and cannot be held responsible where users breach these restrictions. If you store any sensitive personal information on our servers, you are consenting to our storage of that information on our servers.
- 3.3** If you're a child under the age of 16 (or are otherwise younger than the legal age limit required in the country in which you reside), you may not have a user account on Pebble. Pebble does not knowingly collect information from or direct any of our content specifically to children under relevant ages. If we learn or have reason to suspect that you are a user who meets these criteria, we will unfortunately have to close your user account. Please see our Terms of Service for information about user account termination.

If you are a child aged between 16 and 18 using our Software Services or websites from the UK or European Union, you must have informed your parents or guardians of this, of the terms of this policy, and have their consent to do so.

4. HOW IS INFORMATION USED?

- 4.1** We will only use your personal data when the law allows us to. Most commonly, we will use your personal data (other than Pebble Data) in the following circumstances:
- 4.1.1** Where we need to perform the contract we are about to enter into or have entered into with you, to keep internal records for administration purposes related to such contracts, for the purposes contemplated in any separate terms of use for our websites that you have entered into, including for the purposes set out in the "Our Standard Business Operations" section below. This is the ground we rely upon to process Customer Data our customers upload when using our Services.
 - 4.1.2** Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
 - 4.1.3** Where we need to comply with a legal or regulatory obligation including for audit purposes.
- 4.2** We only use Pebble Data in the following circumstances:
- 4.2.1** To operate, maintain and improve Pebble and its related features.
 - 4.2.2** Where necessary to give you access to Pebble and related features, engage with the content or otherwise interact with Pebble.
 - 4.2.3** To provide technical support or customer service.
 - 4.2.4** To communicate with you about Pebble and any relevant updates.
 - 4.2.5** Where we need to comply with a legal or regulatory obligation and audit.
- 4.3** Generally, we do not rely on consent as a legal basis for processing your personal data other than as set out below in relation to marketing, product development and testimonials. We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

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4.4 Where you use the Services at the request of your employer or a third party with whom you or your business interacts, and we provide services to that entity as the relevant customer, we collect, use and share your personal information for the above purposes at the request of, and in accordance with the directions of that entity (in the manner contemplated by the technical configuration of the Software Services). That third party is the data controller of your personal information for such purposes, and we are the data processor. The third party has personal information protection policies and processes that may differ from the privacy statement you are currently reading, and we recommend that you read such policies before accessing or using the Software Services. If you have yourself individually subscribed to the Software Services as a controller, we collect, use and share your personal information for the above purposes for and on your behalf and we are the processor of your personal information for such purposes.

4.5 Our Standard Business Operations:

- 4.5.1 To register you as a new customer;
- 4.5.2 To provide the Services and any other responsibilities that we contract to do so with you;
- 4.5.3 To provide you with information that you request from us;
- 4.5.4 To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you;
- 4.5.5 To use data analytics to improve our website, Software Services and other Services, marketing, customer relationships and experiences;
- 4.5.6 To confirm your identity as a natural living person; and
- 4.5.7 As part of our billing, payments and recovery processes.

We may also use contact information to notify you of any issues which might impact the provision of our Services to you or on your use of the Software Services.

4.6 Marketing

We use a third-party mailing service provider to help us maintain email contact lists to allow us to communicate with individuals who do business with us or who have expressed an interest in our Services.

We may contact you to respond to requests that you make, notify you of changes to the Services, for marketing purposes, or to otherwise inform you of information related to our business.

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We operate on the assumption that when you sign up for our newsletter or you sign a contract with us, you opt-in to receive marketing communications from us. If this is not the case and you would like to opt-out of this service, please let us know via email at info@usepebble.com.

Where you opt out of receiving marketing messages, this will not apply to personal data (other than Pebble Data) provided to us as a result of your engagement with us to provide Services to you.

We will never sell your personal data to any third party (as noted below).

4.7 Testimonials

We may post customer testimonials and comments on our websites or other platforms, which may contain personal data. We obtain each customer's consent via email prior to posting the customer's name and testimonial.

4.8 Change of Purpose

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.

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.

4.9 Legal Requirements

We will keep and use your data in terms of any legal or regulatory requirements that we have.

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We can also use your data to protect our legal position, if legal action is required, including as regards the recovery of any outstanding debts.

Further, we will share your personal data with the relevant agencies and without notice, where we are requested to or suspect fraudulent activities, money laundering, terrorist related activities, or where there has been a report of any criminal behaviour made against you in respect of any of your activities conducted on the Pebble platform.

4.10 Pebble Data

Whilst we may have access to personal data stored on Pebble, i.e., what we call **Pebble Data** in these terms, we do not process such data otherwise than in accordance with your instructions or this notice. It belongs to you, and you are responsible for it, as well as for making sure that your content complies with our Terms of Service.

We do not access any information (including personal data contained in same) you have stored using your Pebble user account unless required to for security or maintenance, for support reasons, or with the consent of the account owner and under their instruction; or process it other than to store the data securely as described herein, and then delete it as applicable, or as strictly required by law. We will only edit or override any data you store on Pebble upon request from the account owner.

4.11 Enhancing the Software Services

We may use Pebble Data for the purposes of providing, enhancing, or improving our compliance solutions, demographic targeting, and the Software Services.

4.12 Website Administration and Customisation

We may use the information we collect about you (with the exception of Pebble Data) for a variety of website administration purposes, and customisation purposes. For example, we use your information to process your registration request, provide you with services and communications that you have requested, send you email updates and other communications, customise features that appear on our websites, deliver our websites content to you, measure Website traffic, measure user interests and traffic patterns, and improve our websites and the services and features offered via our websites.

4.13 Aggregated or Non-Identifying Information

Non-identifying information includes information collected from or about you that does not personally identify you – including aggregated information. We treat IP addresses, log file information, user agent strings, computer IDs, and related information as non-identifying information, except if applicable law suggest us to do otherwise. Certain jurisdictions, including the European Union, may deem IP addresses and/or Unique IDs, to be personal data. Accordingly, for persons in such jurisdictions, our use of non-identifying information as described in this policy should be assumed to include IP address and Unique ID data.

We also treat anonymised information about specific users who have achieved certain results or objectives using Pebble, or similar aggregated information relating to use of Pebble, as non-identifying information, e.g. X user listed X categories of project, and Y% of users were interested in engaging with projects in Z industries, when using Pebble. We do not treat specific confidential information, for example sensitive business information shared in the course of collaboration on a live project, as non-identifying information.

We may use non-identifying information for any purpose, including where we combine it with third party data sources (including data obtained from offline sources and data obtained from our users using the Software Services) in our effort to improve the Software Services.

5. WHAT INFORMATION IS SHARED?

5.1 We do not disclose personal data outside Pebble, except in the situations listed in this section or in the section below on Compelled Disclosure, but may have to share your personal data with the categories of data processors or data controllers set out below for the purposes set out above or otherwise below:

5.1.1 with HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom, the European Union or other jurisdictions in which we do business and to whose laws we are subject who require reporting of processing activities in certain circumstances

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(excluding private Customer Data – unless we are subject to a Compelled Disclosure, or as otherwise noted below);

- 5.1.2 with third party purchasers, if we buy, sell or merge any business or assets of our business and are required to share data as part of the buying, selling or merger agreement or if our assets are acquired by a third-party, and data is transferred as part of the purchased assets. If any such change happens, we will ensure that it is under terms that preserve the confidentiality of your personal data, and we will notify you on our website or by email before any transfer of your personal data. Any purchaser would be bound by the terms of this policy and our terms of business with your organisation;
- 5.1.3 with professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services, where they have a need to know same for any of the purposes set out above (excluding private Customer Data which we would typically not share unless in seeking to understand our legal obligations in connection with any Compelled Disclosure request);
- 5.1.4 with sub-contractors such as consultancy staff whom we use to deliver the Software Services, facilitate sales activities in specific jurisdictions and assist us with other services relating to the Software Services, where they have a need to know same for any of the purposes set out above;
- 5.1.5 with reputable and trusted third-parties where we have asked them to contact you on our behalf, where you have given us consent, it is part of our contractual agreement, is a legal requirement or there is clear legitimate interest between us (these services may include sending you an email, or calling you by telephone) (excluding private Customer Data, unless for the limited purposes described above);
- 5.1.6 with specific selected third parties, determined by us, if you breach any agreement with us, including so as to enforce our rights against you, including credit-reference agencies, debt-collection firms or service providers, solicitors or barristers and law enforcement agencies (if applicable);
- 5.1.7 where you use the Software Services at the request of your employer or a third party organisation who has paid for or facilitated your access, and we provide Software Services to your employer / that organisation, we share your personal information with your employer / that organisation for certain purposes as a data processor of your employer / that organisation;
- 5.1.8 in respect of any publicly viewable information on the Pebble Platform, any of your public facing information which can be viewed, given the configuration of the Software Services, by all other users of the Pebble Platform (this includes, for example, user handles, where you comment on any threads within the Platform, or personal data comprised in any project listing placed on the Pebble Platform);
- 5.1.9 with service providers acting as processors based in the European Union or United Kingdom who provide IT and system administration services, including for the performance of our contract with you, as set out below:
 - with email marketing services to send marketing emails where you have opted in to receiving them. You can unsubscribe directly from any mailing list using the unsubscribe links provided within emails (the data shared only includes email addresses and names);
 - with DNS providers and domain name registrars such as CloudFlare;
 - with third party providers assisting with email send functionality, such as Resend;
 - with analytical service providers such as Google Analytics, in order to analyse our website traffic to improve products and services (the nature of the data shared is only that strictly necessary for such purposes, as further described in Appendix 1 below);
 - with processors offering software tools for identity verification on the Pebble API, and/or allowing customers to submit, manage or otherwise use content relating to others, such as end users of third-party applications; or providers of EU or UK based external servers (including externally provided original and backup servers) that are used to store personal data provided by you on our behalf (our current servers are maintained by Amazon Web Services (**AWS**) in the UK and Dublin), whose privacy policies are available [here](#); and
 - with service providers processing credit card payments.

When we transfer your data to our service providers, we remain responsible for it.

- 5.2 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process the minimal personal data required for the specified purposes, in accordance with our instructions, where they have agreed to privacy restrictions similar to our own policy.

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- 5.3 We do not share, sell, rent, or trade personal data with third parties for their commercial purposes.
- 5.4 We may also share personal data with your permission, so we can perform services you have requested.

6. IS SHARED INFORMATION TREATED DIFFERENTLY?

- 6.1 The Software Services allow you to share the data you process using them with other users who may access that content and use it in compliance with our Terms of Service, and to generally configure your access privileges, where, for example, an educational institution sets different levels of access privileges for students and staff, or grants access to new users under its administrator account, and where individual users interact with other users.
- 6.2 Any personal data associated with Pebble Data may be gathered by third parties with whom you have chosen to share your Pebble user account. If you do not want your Personal Information to be utilised by third parties, please do not make your Pebble Data available to them.

Whilst Pebble accepts no responsibility for how other users may use information stored on your Pebble user account you choose to share with them, we do require our users to agree that if they would like to use other users' data, they may only use it for the purposes authorised by the relevant account holder. For example, where a Pebble user has made an email address available for the purpose of identification and attribution, do not use that email address for advertising. We expect you to reasonably secure any Pebble Data you have gathered from other users, and to respond promptly to complaints, removal requests, and "do not contact" requests from Pebble or other Pebble users.

7. HOW IS MY INFORMATION SECURED?

- 7.1 Pebble takes all measures reasonably necessary to protect personal data from unauthorised access, alteration, or destruction, maintain data accuracy and help ensure the appropriate use of personal data. We follow generally accepted industry standards to protect the personal data we hold, both during transmission and once we receive it.
- 7.2 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 duties of confidentiality.
- 7.3 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.
- 7.4 No method of transmission, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security. For more information on the measures we take to secure your personal data, please see our Security Policy. [<https://www.usepebble.com/security-policy>]

8. HOW IS INFORMATION COLLECTED AND STORED GLOBALLY?

- 8.1 Information that we collect will be stored and processed in the United Kingdom and the European Union in accordance with this policy. However, we understand that we have users from different countries and regions with different privacy expectations and local legal requirements, and we try to meet those needs and requirements.
- 8.2 We provide the same standard of privacy protection to all our users around the world, regardless of their country of origin or location, and we are proud of the levels of notice, choice, accountability, security, data integrity, access, and recourse we provide. We work hard to comply with the applicable data privacy laws wherever we do business.

Additionally, we require that if our vendors or affiliates have access to personal data, they must comply with applicable data privacy laws, including signing data transfer agreements such as EU standard contractual clause agreements, where required by law.

- 8.3 In particular:

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- 8.3.1 we provide clear methods of unambiguous, informed consent at the time of data collection, when we do collect your personal data and if applicable. Where consent is not the applicable ground for processing, we will ensure that it has an appropriate ground for processing any personal data (including but not limited to contractual obligation or legitimate interest);
- 8.3.2 we collect only the minimum amount of personal data necessary unless you choose to provide more. We encourage you to only give us the amount of data you are comfortable sharing and which is commercially necessary;
- 8.3.3 we offer you simple methods of accessing, correcting, or deleting the data we have collected; and
- 8.3.4 we provide our users notice, choice, accountability, security, and access, and we limit the purpose for processing. We also provide our users a method of recourse and enforcement.

9. WHAT HAPPENS IF I HAVE A COMPLAINT?

- 9.1 If you have concerns about the way Pebble is handling your personal data, please let us know immediately. We want to help and there are several ways available that you can contact us. You may also email us directly at with the subject line "Data Privacy". We will respond as soon as reasonably possible and within the relevant timelines required by law.
- 9.2 If you are a data subject based in the UK or European Union, you may 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), or other competent supervisory authority of an EU member state if the Services are accessed outside the UK but from another EU member state. We would appreciate the chance to deal with your concerns before you approach such bodies so would ask that you please contact us in the first instance.

10. HOW DO YOU RESPOND TO COMPELLED DISCLOSURE REQUIREMENTS?

- 10.1 Pebble may disclose personal data or other information we collect about you to law enforcement in response to a valid subpoena, court order, warrant, or similar governmental order, or when we believe in good faith that disclosure is reasonably necessary to protect our property or rights, or those of third parties or the public at large.
- 10.2 In complying with court orders and similar legal processes, Pebble strives for transparency. When permitted, we will make a reasonable effort to notify users of any disclosure of their information, unless we are prohibited by law or court order from doing so, or in rare, exigent circumstances.

11. HOW CAN I ACCESS MY OWN PERSONAL INFORMATION?

If you're already a user, you may access, update, alter, or delete your basic user profile information by editing your user profile or contacting us.

Under certain circumstances, where you are a citizen of the European Union or UK, you have rights under data protection laws in relation to your personal data under GDPR.

You have the right 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.
- Please 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.

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- **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: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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 (d) 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.

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

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 may refuse to comply with your request in these circumstances.

Where you exercise one of your rights, we may need to request specific information from you to help us confirm your identity and ensure your right to exercise such 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.

We try to respond to all legitimate requests within one month. Occasionally it may 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.

12. DATA RETENTION AND DELETION

Personal Data Generally

- 12.1** We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- 12.2** 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 requirements.
- 12.3** We will keep your personal data for the term you have consented to, the contracted term between us where there is a legitimate interest for us to remain in contact with you, or for the legally required period, whichever is the longest.
- 12.4** By law we have to keep basic information about any of our customers (including contact, identity, financial and transaction data) for six years after you cease being a customer for tax purposes. For the purposes of contract administration, we will also store all data as long as the contract you have placed through us endures and for the six year limitation period thereafter in case you raise any claims in relation to any Services you have purchased from us. This section does not apply to your personal data or Pebble Data.
- 12.5** In some circumstances we may anonymise 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. Pebble will retain personal data on your behalf whilst either a) valid grounds for processing exist; or b) a maximum of six years following termination of your Pebble user account (excluding Pebble Data as noted below).

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- 12.6** If you would like to cancel your Pebble user account and initiate deletion of your personal data, you may do so by contacting us at info@usepebble.com. As above, we will retain and use your information as necessary to comply with our legal obligations, resolve disputes, maintain security, and enforce our agreements, but barring legal requirements, the timeframe above will be observed for deletion.

Pebble Data

- 12.7** We will endeavour to delete any Pebble Data no later than 6 months after your account being terminated, or you deleting such Pebble Data using your account. This is to synchronise deletion of such Pebble Data with our annual data deletion cycles, and to facilitate the potential provision of a service to you (as our customer) that may permit the restoration of your account, or of accidentally deleted Pebble Data, upon request and for payment of a fee. You should note that this is not guaranteed, and that Pebble Data may be, irrevocably, deleted more quickly. Please note that Pebble Data for each educational institution, and each business, is treated discretely, and some Pebble Data may be retained relating to you if, for example, a business with whom you have interacted continues to use Pebble, in a scenario where your educational institution no longer does (or vice versa).

13. HOW DO YOU COMMUNICATE WITH USERS?

- 13.1** We will use your email address to communicate with you, if you've given us the OK, and only for the reasons you've permitted. Emails by default are not disclosed with other users. This will not change how we contact you, as we always utilise your primary email address.
- 13.2** Depending on your email settings, Pebble may occasionally send notification emails about new features, requests for feedback, important policy changes, or to offer customer support. We also send marketing emails, but only with your consent. There's an unsubscribe link located at the bottom of each of the emails we send you.
- 13.3** Our emails might contain a pixel tag, which is a small, clear image that can tell us whether or not you have opened an email and what your IP address is. We use this pixel tag to make our email more effective for you and to make sure we're not sending you unwanted email. If you prefer not to receive pixel tags, please opt out of marketing emails.

14. WILL YOUR PRIVACY POLICY CHANGE?

If there are material changes to this policy or in how we use your personal data, we will prominently post such changes prior to implementing the change. We encourage you to periodically review this policy to be informed of how we are collecting and using your information.

We keep this policy under regular review, for example, to reflect changing business circumstances and legal developments.

Although most changes are likely to be minor, it may change and if it does, these changes will be posted on this page and, where appropriate, notified to you when you next log on to use the Services. Otherwise, any changes shall be applicable without further notice.

This version 1 of this policy was updated on 10 July 2024 and historic versions can be obtained by contacting us.

15. HOW CAN I CONTACT PEBBLE?

Questions regarding our Privacy Policy or information practices should be directed to us via one of the following contact methods:

Full name of legal entity: Pebble (PBL) Ltd

Email address: info@usepebble.com

Postal address: 34 Grafton Street, Londonderry, Northern Ireland, BT48 0ER

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APPENDIX 1 – GENERAL COOKIES AND OTHER TECHNOLOGIES POLICY (PEBBLE WEBSITES EXCEPTING PEBBLE)

1. WHAT SPECIFIC TECHNICAL DATA DO PEBBLE COLLECT?

- 1.1 Pebble collects and analyses traffic by keeping track of the IP addresses of our visitors and by collecting log file information. Your IP address is a number that is automatically assigned to the computer that you are using by your Internet service provider (**ISP**) or by another organisation. An IP address, by itself, cannot identify you personally (unless you are logged in whilst using our sites). However, when combined with other information, your IP address can be used to identify the computer you are using. In addition, Pebble may use your IP address to estimate your geographic location.
- 1.2 Our websites use "cookies" and similar technologies on our websites and when providing the Services. A cookie is a file stored on your device that may be used to identify an individual as a unique user by storing certain personal preferences and user data. Pebble uses cookies and other technologies to identify your device, identify authorised users of the Pebble service, track affiliate referrals, complete online purchases through Pebble's billing system, and similar Website monitoring activities.
- 1.3 Pebble may also use web beacons, small graphic images or other web programming code (also known as "1x1 GIFs" or "clear GIFs"), which may be included in our web pages and email messages. Web beacons may be invisible to you, but any electronic image or other web programming code inserted into a web page or e-mail can act as a web beacon. Web beacons or similar technologies may be used for a number of purposes, including, without limitation, to count visitors to our websites, to monitor how users navigate our websites, to count how many e-mails that were sent were actually opened or to count how many particular articles or links were actually viewed.
- 1.4 Pebble may also use embedded scripts on our websites and in connection with the provision of its Services. "Embedded scripts" are programming code designed to collect information about your interactions with a website, such as the links you click on, and may assist our customers in providing us with information used to provide the Services. The code is temporarily downloaded onto your device from our web server, our customer's web server, or a third party service provider, is active only while you are connected to our websites containing the embedded script, and is deactivated or deleted thereafter.
- 1.5 Your web browser automatically sends information to every website you visit, including ours. For example, our server logs may receive and record information such as the pages you access on our websites, referring URLs, your browser type, your operating system, the date and time of your visit, and the duration of your visit to each page.
- 1.6 Log file information may also include a user agent string, a series of characters automatically sent with your Internet requests that provide information necessary for smooth Internet communications such as the operating system and browser you used. Similar to an IP address, a user agent string, by itself, does not identify you personally. However, when combined with other information, a user agent string might be used to identify the computer originating a message.
- 1.7 Pebble may also request access to or otherwise receive information about your device location when you access our websites. Your location data may be based on your IP address. We use location data in connection with providing the Services and to help improve the Services.
- 1.8 Pebble may assign your computer or mobile device a unique identification number (**Unique ID**) based on log file information when you access our websites. Pebble may set a cookie on your device containing, amongst other things, the device's Unique ID. Pebble uses information generated from the Unique ID for purposes of improving our Services, primarily our ability to detect fraud. Pebble does not share the Unique ID or any associated data with unaffiliated third parties.

2. WHAT COOKIES / TRACKING CODE ARE USED BY PEBBLE?

2.1 Cookies

- 2.1.1 Pebble uses cookies to make interactions with our service easy and meaningful. We use cookies (and similar technologies, like HTML5 local storage) to keep you logged in, remember your preferences, and provide information for future development of Pebble.
- 2.1.2 A cookie is a small piece of text that our web server stores on your computer or mobile device, which your browser sends to us when you return to our site. Cookies do not necessarily identify you if you are merely visiting

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Pebble; however, a cookie may store a unique identifier for each logged in user. The cookies Pebble sets are essential for the operation of our websites, or are used for performance or functionality. By using our website, you agree that we can place these types of cookies on your computer or device. If you disable your browser or device's ability to accept cookies, you will not be able to log in or use Pebble's services.

2.2 Google Analytics

2.2.1 We use Google Analytics as a third party tracking service, but we don't use it to track you individually or collect your personal data. We use Google Analytics to collect information about how our website performs and how our users, in general, navigate through and use Pebble. This helps us evaluate our users' use of Pebble; compile statistical reports on activity; and improve our content and website performance.

2.2.2 Google Analytics gathers certain simple, non-personally identifying information over time, such as your IP address, browser type, internet service provider, referring and exit pages, time stamp, and similar data about your use of Pebble. We do not link this information to any of your personal information such as your user name.

2.2.3 Pebble will not, nor will we allow any third party to, use the Google Analytics tool to track our users individually; collect any personal data other than IP address; or correlate your IP address with your identity. Google provides further information about its own privacy practices and offers a browser add-on to opt out of Google Analytics tracking.

2.3 Tracking

2.3.1 "Do Not Track" is a privacy preference you can set in your browser if you do not want online services to collect and share certain kinds of information about your online activity from third party tracking services. We do not track your online browsing activity on other online services over time and we do not permit third-party services to track your activity on our site beyond our basic Google Analytics tracking, which you may opt out of. Because we do not share this kind of data with third party services or permit this kind of third party data collection on Pebble for any of our users, and we do not track our users on third-party websites ourselves, we do not need to respond differently to an individual browser's Do Not Track setting.

2.3.2 If you are interested in turning on your browser's privacy and Do Not Track settings, the Do Not Track website has browser-specific instructions.

2.3.3 Please see our section on email communication to learn about our use of pixel tags in marketing emails.

3. WHAT COOKIES / TRACKING CODE ARE USED BY THIRD PARTIES?

3.1 We have set out a non-exhaustive list of the critical third-party services providers whose software and services we utilise in the provision of Pebble, and with whom your account might otherwise interact. These third-party service providers may use cookies in accordance with their applicable privacy policies, and those cookies may be placed on your machine. While we have provided links to the relevant privacy / cookies policies, you should refer to each third party's respective website as these policies may be updated from time-to-time.

3.1.1 AWS

We use AWS to host our servers. Amazon's cookie policy can be found at: <https://aws.amazon.com/privacy/>

3.1.2 Google Analytics

We use Google Analytics to collect information about how our website performs and how our users navigate and use Pebble. Google's cookie policy can be found at: policies.google.com/technologies/cookies?hl=en-US.

3.1.3 Supabase

We use Supabase to submit, manage or otherwise use content relating to others, specifically []. Supabase's privacy and cookies policy can be found at: <https://supabase.com/privacy#4-how-we-use-cookies-and-other-tracking-technology-to-collect-information>

3.1.4 Cloud Flare

We use Cloudflare to [optimize security, performance and reliability of our Software Services, including []. Cloudflare's cookies policy can be found at: <https://www.cloudflare.com/cookie-policy/>

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