Privacy Policy

Last Updated: January 5, 2025

Introduction

ScreenDisplay Ltd ("we," "our," "us," or "the Company") is committed to protecting and respecting your privacy. This Privacy Policy explains how we collect, use, and safeguard your personal data in connection with our digital signage services.

Definitions

- **Personal Data**: Any information relating to an identified or identifiable natural person
- User: Any individual who accesses or uses our digital signage services
- Service: The digital signage platform and related services provided by ScreenDisplay Ltd
- Data Controller: ScreenDisplay Ltd (Company Number: 16150216)
- Data Processor: Third parties who process data on our behalf

1. Information We Collect

1.1. User Information

- ID: A unique identifier generated for each user
- Email: Email address used for authentication and communication
- Password: Securely encrypted password for account access
- First and Last Name: Names provided during account creation
- Organisation ID: Identifier of the organisation the user belongs to
- Role: User role within the organisation
- Created At: Timestamp of account creation
- IP Address: Collected automatically when accessing our services
- Device Information: Browser type, operating system, and device identifiers

1.2. Organisation Information

- Organisation name and registration details
- Business address and contact information
- VAT number and subscription plan details
- Billing contact information
- Created At timestamp
- Organisation administrator details

1.3. Digital Signage Data

- Scene configurations and content
- Playlist arrangements and schedules
- Screen locations and settings
- Content performance analytics
- Usage statistics and logs

2. Legal Basis for Processing

We process your personal data on the following legal grounds:

- **Contract Performance**: Processing necessary to provide our digital signage services
- Legitimate Interests: To improve our services, prevent fraud, and ensure network security
- Legal Obligation: To comply with UK and EU law
- **Consent**: For marketing communications (where applicable)

3. How We Use Your Information

We use your data to:

- Provide and maintain our digital signage services
- Process payments and manage subscriptions
- Send service updates and essential notifications
- Improve and optimize our platform
- Provide customer support

- Prevent fraud and abuse
- Generate anonymous analytics reports

4. Data Sharing and Third-Party Processors

4.1. Service Providers (Data Processors)

- Supabase: Database management and storage
- **BunnyCDN**: Content delivery network services
- FyfeWeb: Hosting and infrastructure
- Nonic.cloud: VPS services

All processors are bound by data processing agreements ensuring GDPR compliance.

4.2. Other Disclosures

We may share data:

- When required by law or court order
- To protect our rights or property
- During a business transfer or merger
- With your explicit consent

5. Data Security

We implement appropriate technical and organizational measures including:

- End-to-end encryption for sensitive data
- Regular security assessments
- Access controls and authentication
- Staff training on data protection
- Regular backup procedures

6. Data Retention

- Account data: Retained while account is active plus 6 years for legal compliance
- Usage logs: 12 months

- Billing information: 7 years (as required by UK law)
- Marketing preferences: Until consent withdrawal

7. Your Rights

Under UK and EU data protection laws, you have the right to:

- Access your personal data
- Correct inaccurate data
- Request data erasure
- Object to processing
- Request data portability
- Withdraw marketing consent

We will respond to rights requests within one month.

8. International Transfers

Data is primarily stored in the UK and EU. Any transfers outside these areas are protected by:

- Standard Contractual Clauses
- Adequacy decisions
- Appropriate safeguards as required by UK GDPR

9. Cookies and Tracking

We use essential cookies for:

- User authentication
- Service functionality
- Security purposes

Analytics cookies are optional and can be managed through your browser settings.

10. Children's Privacy

Our services are not directed at children under 16. We do not knowingly collect data from children.

11. Changes to This Policy

We may update this policy periodically. Significant changes will be notified via email or service notification.

12. Contact Us

ScreenDisplay Ltd

- Company Number: 16150216
- Phone: 0330 229 3575
- Email: <u>support@screendisplay.org</u>

Data Protection Queries

For privacy-related questions or to exercise your rights, contact us at support@screendisplay.org. You have the right to lodge complaints with the Information Commissioner's Office (ICO).

Response Times

- General queries: 2 business days
- Rights requests: Within 30 days
- Data breach notifications: Within 72 hours (if applicable)

13. Supervisory Authority

You have the right to lodge a complaint with the ICO (<u>www.ico.org.uk</u>) if you believe we have not handled your data in accordance with the law.