



Last updated: 14th December 2021

Pulse 360 Privacy Notice

FSP Consulting Services Limited ("FSP", "we", "us", and "our") are committed to respecting and protecting your personal information. This Privacy Notice ("Privacy Notice"), together with our Terms and Conditions and any other documents referred to herein, sets out how we will hold and manage any personal information that we collect from you or that you provide to us for the purposes of accessing and using the Pulse 360 Application, web application or Microsoft Teams application ("App"). This Privacy Notice is supplemental to FSP's corporate Privacy Statement (available at <https://fsp.co/privacy-statement>). This Privacy Notice governs the collection and use of data through our Pulse 360 Application.

Consent

Downloading, accessing or using the Application signifies that you have read this Privacy Notice and consent to its terms. If you do not agree to the terms of this Privacy Notice, please do not proceed to download, access or use Pulse 360, either via the App, Web App or Microsoft Teams App.

You have the right to withdraw your consent to us processing your personal data, at any time, by writing to us via the contact details provided at the end of this Privacy Notice.

We send notifications and emails from time to time in order to update you about any service updates. If you no longer wish to receive these communications, please contact us using the link in the about page in the application to let us know.

Personal Information we collect

Any information provided by you or collected via the App which can identify you is referred to as "Personal Information" in this Privacy Notice.

Personal Information can be collected or provided in the following ways:

- **User Provided Information:** When you download the App, we may request you provide us with Personal Information in relation to your use of the FSP services ("Services"). The information we may collect includes:
 - your first name, last name, sign-in name, email address, password, job title, company name location, contact phone number, manager, team/department and photograph;
 - Information you provide in relation to requests or queries; and



- Other information you enter into the your Pulse 360 account when using the App.
- **Device Information:** when you download the App, or access one of our websites, we may collect information about the device you are using, including your mobile phone number, the name you may have assigned to your device, the type of device you are using,

Page 1 of 5

the unique identifier for your device, the application version, type of operating system, the internet browser types and versions on the device, time zone setting, and the Internet Protocol (IP) address;

- **Analytics:** In order to understand how the App is functioning on your device, we may use analytics software. The analytics software may record information about your activity in the App including how often you use the application, where the App was downloaded from, the events that occur within the application (date and time of visits, length of visits to certain pages, page interaction information such as scrolling and clicks), aggregated usage, and performance data (page response times, download errors and crash logs).
- **Location Information:** we may collect your IP address and on devices where location-based services are enabled, we may receive location information (GPS or other signals). You can restrict our access to your device's location by adjusting the location-based service preferences on your device.
- **Other FSP services:** We may receive information about you if you use any of our other services. In this case we will have informed you when we collected that data that it may be shared internally and combined with the data we have previously collected.
- **Information from other sources:** We work with several third parties (including FSP group companies, subcontractors, partners, analytics providers, search information providers, advertising companies, credit referencing agencies) and we may receive information from them about you. We may add the information you provide us with via the App to the other information we have about you, including the information we receive from any third parties.

Information collected via cookies & tracking devices

- **Cookies:** If you access our Services through the App or via a browser, you may manage the extent to which your Personal Information is shared with us. We use cookies to help us provide you with a good experience when you use our Services, to distinguish you from other users and to help us improve our Services. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy at <https://fsp.co/cookies>.
- **Data Caching:** When you log into the App your credentials will be cached on your device by the App; this is to provide you with a good user experience. This information may only be removed by logging out or removing the account from the App.

How we use the information

FSP may use the information collected through the App to:

- Administer and provide the Services to you;

Page 2 of 5



- Send you important information or notices;
- Inform you of changes to our Services;
- Identify you when you sign-in to your account;
- Allow you to participate in the interactive features of our Services, when you choose to do so;
- Personalise your experience of using the App;
- Ensure content is presented in the most effective manner for you and your device;
- Review the quality and improve the functionality of the App and the Services we provide;
- Conduct internal operations, including troubleshooting, data analysis, testing and research;
- Conduct analysis and industry benchmarking;
- Make suggestions and recommendations directly, or via one of our partners, about products or services that may be of interest to you. If you wish to stop receiving these communications, please contact privacy@foundation-sp.com or follow the unsubscribe link in the communication; Measure or understand the effectiveness of advertising or promotions we send; or
- Comply with the law.

We may also use the information you provide:

- As otherwise consented to by you; or
- As described in the FSP Privacy Statement.

We process the information we collect, including Personal Information, in the UK.

How we share Personal Information

We do not sell your information to third parties. Subject to the terms of the FSP Privacy Statement and applicable laws, we may share your App Usage Information, Device Information and User Provided Information with FSP group companies and third parties who provide services to us, as well as with any other parties described in the App.

FSP may process and transfer such information, both directly and through third party providers working on our behalf, in the ways described in this Privacy Notice and the FSP Privacy Statement.

- **FSP Group Companies:** We may share your Personal Information with other companies from within our corporate group, for example our ultimate holding company, in order to provide the Services to you and to support our business operations.
- **Third Parties:**

We may disclose the information we collect via the App:

- To our partners, service providers, suppliers and sub-contractors who work on our behalf to help deliver or improve the App and our Services;
- When we believe in good faith that disclosure is necessary to protect the rights, property, safety, of yourself, our business, our customers, or others, to investigate fraud, or to respond to a government request;
- If we are required to disclose or share your Personal Information data in order to comply with any legal obligation, or in order to enforce or apply our Terms and Conditions or other agreement with you;



- In the event that we are involved in a merger, acquisition, or sale of all or a portion of our business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets, subject to the seller or buyer signing a suitable confidentiality undertaking;
- To provide aggregates statistics about the visitors that use our services in order to describe our services to prospective clients, partners, sponsors and other reputable third parties and for other lawful purposes, *however these statistics will include no Personal Information*; or
- To any other third party with your prior consent to do so.

We will only share Personal Information with such third parties in the ways described in this Privacy Notice and the FSP Privacy Statement. We require our third-party service providers use the information we provide to them only to perform their obligations in the agreement we have with them and agree to keep all the information we share confidential. Our third-party service providers are expected to maintain privacy and security protections consistent with the FSP Privacy Statement and security policies.

If FSP is involved in a sale, acquisition, or merger of all or a portion of its assets, you will receive a notice via the App or an email (to the address tied to your account), informing you of any change in ownership or changes in how your Personal Information is being used, as well as any choices you have regarding this information.

Security

The measures we take regarding the security of the Personal Information we collect are described in this Privacy Notice and the FSP Privacy Statement.

All information you provide to us or that we collect is stored in the UK, using platform best practices. All personal data will be encrypted at rest and in transit between our UK Based Cloud services and your App. We will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with this Privacy Notice and the FSP Privacy Statement.

You should implement appropriate security measures when using your device and the App.

Where we have given you (or where you have chosen) a password which enables you to access certain Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

How to control the use of your Personal Information

You may opt-out of further collection of your Personal Information via the App by uninstalling the App from your device and stopping accessing the app via the web. Alternatively, you can cancel your account or request we no longer use your Personal Information to provide you with our Services by writing to us via the contact details provided at the end of this Privacy Notice.

For information on how to access, update or delete your personal information, please visit refer to our corporate Privacy Policy <https://fsp.co/privacy-statement>.



Data retention

We retain personal data for as long as necessary for the relevant activity for which it was provided or collected - this will be for as long as you require access to our Services. However, we may keep some data after your account is closed or you cease using the Services for the purposes set out below.

After your account has been closed, we usually delete personal data, however we may retain depersonalised information after your account has been closed. We may also retain personal data where reasonably necessary to: comply with our legal obligations; meet regulatory requirements; resolve disputes; and to enforce our agreements and Terms and Conditions.

Privacy Notice updates

We may update this Privacy Notice from time to time. It was last amended on the date stated at the top of this policy in the "Last Updated" section. If we make any material changes which affects the privacy of your Personal Information, we will notify you by posting a notice on the App or by email (to the address tied to your account), prior to the change becoming effective, giving you a reasonable period of time to object to any changes (which you may do by ceasing to use our Services, Websites and Apps). We encourage you to periodically review this Privacy Notice for the latest information about how we collect, use and share Personal Information.

Contact Us

The security of your information is important to us. Our intention is to meet the highest standards when collecting and using personal information. We follow accepted standards to protect the personal information submitted to us, both during transmission and once it is received.

Should you have any questions regarding privacy while using the App, this Privacy Notice, you wish to assess or amend your information, please contact us via email at privacy@foundation-sp.com or alternatively you can write to us at: FSP Consulting Services Limited, Reading Enterprise Centre, Whiteknights Road, Reading, Berkshire, RG6 6BU, UK.