



CONTROLPOINT APP AND JOINTMANAGER.COM PRIVACY POLICY

ControlPoint Limited of ControlPoint House, Carrwood Road, Chesterfield S41 9QB ("**ControlPoint**", "**us**" or "**we**") is committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

This policy applies to your use of:

- The mobile device based software used to receive, capture and send data to check the integrity of the joints installed in utility assets ("**ControlPoint App**"), once you have downloaded or streamed a copy of the ControlPoint App onto your mobile telephone or handheld device ("**Device**").
- www.jointmanager.com ("**JointManager Website**").
- Any of the joint inspection services provided via the ControlPoint App and the JointManager Website ("**ControlPoint Solution**") provided under an agreement you (or your employer (or any relevant third-party) on your behalf) have entered into with us ("**ControlPoint End-User Agreement**").

1. INFORMATION WE MAY COLLECT FROM YOU

With your consent we may collect and process the following data about you:

- 1.1 **Information you give us:** You may give us certain information about you by filling in forms on the JointManager Website or send to us via the ControlPoint App. Separately we may collect further information when you carry out training on how to use the ControlPoint Solution, App or JointManager Website. The information you give us may include your name, details of your relevant qualifications and appropriate training undertaken, address, e-mail address, the Device's phone number and any information within the joint photos shared via you Device.
- 1.2 **Information your employer may give us:** This includes information your employer who has entered into the ControlPoint End-User Agreement has provided to us to validate that you are an "Authorised User" of the JointManager Website or so we can arrange your training on how to use the ControlPoint Solution, App or JointManager Website and includes your name, e-mail address and details of your relevant qualifications and evidence of appropriate training undertaken.
- 1.3 **Information we collect about you:**

Each time you use the ControlPoint App we may automatically collect the following information:

- 1.3.1 technical information, including the type of mobile device you use, a unique device identifier (for example, your Device's IMEI number, the MAC address of the Device's wireless network interface, or the mobile phone number used by the Device), mobile network information, your mobile operating system, the type of mobile browser you use, time zone setting, ("**Device Information**"); or



- 1.3.2 we may also use GPS technology (or information from nearby Wi-Fi access points (like MAC address and signal strength) and cell towers where GPS isn't available) to determine your Device's current location when operating the ControlPoint App. You can withdraw your consent at any time by changing the permission setting on your Device. However, to be able to provide the ControlPoint Solution in the best manner possible it is necessary for appropriate location data to be transmitted to us with each joint record (either via you filling in the necessary data capture fields within the ControlPoint App or directly from the Device). If you prevent your Device from transmitting appropriate location information or fail to otherwise provide us with appropriate location data we cannot guarantee our ability to be able to provide the ControlPoint Solution.

Each time you use the JointManager Website we may automatically collect the following information:

- 1.3.3 technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- 1.3.4 information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

2. USES MADE OF THE INFORMATION

- 2.1 We use information held about you to ensure that you are an authorised user pursuant to a ControlPoint End-User Agreement and to deliver the ControlPoint Solution.
- 2.2 We may also use the information collected about you for the purposes of:
 - 2.2.1 contacting you about training and further "top-up" training in respect of the ControlPoint Solution;
 - 2.2.2 identifying potential customers;
 - 2.2.3 dealing with your requests and enquiries;
 - 2.2.4 carrying out customer and marketing research; and
 - 2.2.5 providing you with information about products and services offered by ControlPoint Ltd.

3. DISCLOSURE OF YOUR INFORMATION

- 3.1 We may disclose some or all of the data we collect from you when you download the ControlPoint App or when you use the JointManager Website to third parties (including other companies within our group) and authorised members of companies with whom we are contracted or who assist us to deliver the ControlPoint Solution –



this may include details of joint welds you have undertaken including time, date and location.

3.2 We may also in limited circumstances disclose your personal information to third parties:

3.2.1 in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;

3.2.2 if we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request; or

3.2.3 in order to:

3.2.3.1 enforce or apply the ControlPoint End-User Agreement, the JointManager Website and ControlPoint App Terms of Use; or

3.2.3.2 protect the rights, property or safety of ControlPoint our customers, or others.

4. YOUR PERSONAL DATA SECURITY

4.1 The JointManager Website and ControlPoint App are controlled and operated by ControlPoint from the United Kingdom. We do not currently send any data outside the European Union.

4.2 We use industry-standard encryption services when transferring and receiving data and information you provide to us is stored on our secure servers. Unfortunately, the transmission of information via the internet is not completely secure. Although We will do our best to protect your personal data, We cannot guarantee the security of your data transmitted to the JointManager Website; any transmission is at your own risk.

4.3 Measures we use to maintain the security of your data include:

4.3.1 making regular backups of files;

4.3.2 protecting file servers and workstations with virus scanning software;

4.3.3 using a system of passwords so that access to data is restricted;

4.3.4 allowing only authorised staff into certain computer areas;

4.3.5 using data encryption techniques to code data when in transit;

4.3.6 ensuring that staff are only given sufficient rights to any systems to enable them to perform their job function



5. YOUR RIGHTS

- 5.1 You have the right to access any personal information that we process about you and to request information about:
- 5.1.1 what personal data we hold about you;
 - 5.1.2 the purpose of the processing;
 - 5.1.3 the categories of personal data concerned;
 - 5.1.4 the recipients to whom the data has been/will be disclosed;
 - 5.1.5 how long we intend to store your personal data;
 - 5.1.6 if we did not obtain the personal data direct from you, the source
- 5.2 If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible, but certainly within legal timeframes, unless there is a valid reason for not doing so, in which case you will be notified.
- 5.3 You also have the right to request erasure of your personal data or to restrict its use in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use..
- 5.4 Requests under this clause should be made to info@controlpoint.co.uk using the heading GDPR. Or write to us at ControlPoint House, Carrwood Road, Chesterfield S41 9QB, for the attention of the Data Protection Team.
- 5.5 If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request. This is to ensure that your data is protected and kept secure.
- 5.6 You also have the right complain to the Information Commissioner's Office if you are not satisfied with our use of your data (<https://ico.org.uk>)

6. COOKIES

We use cookies to distinguish you from other users of the App, ControlPoint or JointManager Website (as appropriate). This helps us to provide you with a good experience when you use the ControlPoint App or browse the JointManager Website and also allows us to improve the ControlPoint App and JointManager Website. For detailed information on the cookies we use and the purposes for which we use them, see our cookie policy.

7. CHANGES TO PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you when you next start the ControlPoint App or log onto the JointManager Website.

