

## PRIVACY

Most of us value our privacy, certainly when it comes to personal information. We understand this and only collect and store data that enables us to provide our services to you. Without this data, we simply wouldn't be able to provide our service. We will only collect and process data in line with our [Terms](#) and the policy detailed below.

### WHO ARE WE

Firstly it would be useful to clarify who we are and where this policy applies. We are **Capsa** (Capsa Software Ltd Co No 15563287) who are part of **MAKE** (MAKE Group Co No 09656022).

This policy applies to all websites, apps and services that we own and operate under the above companies. For ease, we will refer to these as our 'services' and will sometimes include third-party services, such as support and training.

### WHAT DATA DO WE COLLECT?

When you visit Capsa or use any of our services we collect different types of data to enable us to provide our service. This data may vary depending upon the service and business need, but usually consists of the following data types :

- **Identity :**  
For example; your name, email, phone number, organisation, address.
- **Financial :**  
For example; payment details, organisation details.
- **Project :**  
For example; project location, type, images and documents.
- **Technical :**  
For example; details on your profile, usage, location, access history, support.
- **Grouped :**  
We also collect statistics around the use of our services, such as project data. This won't include an specific personal data about a single user, but will instead group data together to provide high level, anonymised information to establish trends and potential issues.

## HOW WE COLLECT YOUR DATA

We collect data in the following ways :

- **Information you provide directly to us :**

This is how we gather most of our information. You will provide this information when you sign up to Capsa, fill in forms to speak to us.

- **Information we collect automatically :**

We sometimes collect data about you whilst you are using our services; this includes data like your location, devices or frequently used services. Some of this is collected using cookies; you can check our [Cookies](#) policy for further information.

- **Information we get from third parties :**

To help us deliver and improve our services to you, we use third parties to help us host, administer, monitor, upgrade and market our services. Further data may be collected for the above purposes and will all be in accordance with our legal obligations and the third parties' own policies.

You can find out more about our key third-party suppliers in our support centre.

## HOW WE USE YOUR DATA

To state the obvious, we use your data with the primary purpose of providing the requested service to you. This will typically include using data to :

- **Manage our relationship with you :**

This will include communicating with you, processing orders, providing support, checking in, and in providing our service.

- **Improve and market our service :**

This will include analytical appraisals, tracking and monitoring our service so we can continue to improve it. It may also include some selected marketing to you to make you aware of new services or promotions.

- **Comply with laws :**

This will include using data where required to comply with any applicable laws and regulations and any legal notices we need to comply with. It will also include notifying you of any changes.



## SHARING YOUR DATA

There may be times when we need to share your personal data with third parties. We will only disclose your personal data to :

- other companies in the Capsa and MAKE group of companies.
- third party service providers and partners who assist and enable us to use the personal data to, for example, support delivery of or provide functionality on the website or services, or to market or promote our goods and services to you.
- regulators, law enforcement bodies, government agencies, courts or other third parties where we think it's necessary to comply with applicable laws or regulations, or to exercise, establish or defend our legal rights. Where possible and appropriate, we will notify you of this type of disclosure.

As our services can be accessed anywhere with an internet connection, your data may be transferred and processed in other countries, including outside the European Economic Area (EEA), Switzerland or the UK, by third parties. We also used a third party to host our data. The data protection rules may have different data protection laws to those in the UK.

Your personal data will only be transferred to a country that the European Commission or the UK Data Commissioner has determined provides an adequate level of protection or, where the 3rd party vendor is bound by standard contractual clauses according to conditions provided by the European Commission.

## HOW DO WE PROTECT YOUR DATA?

To use our services you will create your own password to access our services. It's your responsibility to choose a secure password, keep it safe and confidential. We will never ask you for your password.

All data is encrypted and any data stored on our portal is hosted by Google Firebase. Details on their security provisions can be found [here](#).

We also control who can see your data to those who need to know to be able to deliver our services to you.

You can find out more about our security and protection measures in our support centre.



## HOW LONG DO WE KEEP YOUR DATA?

We will keep your data whilst you continue to use our services and for a period of time afterwards, whilst there is a business or legal need to retain it.

Your account with capsa needs to be validated every 12 months to ensure you are an active user. Should you not validate your account after this period we shall consider the account dormant. We shall retain your data for 12 months after this period in case you need to reactivate your account. After this period all of your personal data will be deleted.

A key feature of our portal is the historical user access information for each project. This logs all activity on a project. This activity data will be kept whilst the project is live and for a period of 24 months after the project is closed by the project owner. This will retain your name, organisation and email, all other personal data will be deleted.

## YOUR RIGHTS

Under data protection law you have the right to :

- know what personal data we hold about you, and to make sure it's correct and up to date.
- request a copy of your personal data or ask us to restrict processing your personal data or delete it.
- object to our continued processing of your personal data.

You can exercise these rights at any time by sending an email to our support team at [support@capsaapp.com](mailto:support@capsaapp.com).

## CHANGES AND CONTACT

We keep our policies under regular review so they align with the services we offer. Any changes will be published on this page, should anything significant change we will let you know by email.

If you ever have any questions about how Capsa manages privacy you are welcome to contact our support team at [support@capsaapp.com](mailto:support@capsaapp.com), we are always happy to help..