

Version: 21 July 2021

PRIVACY POLICY

This Privacy Policy is a Schedule of and forms part of the BBB On Demand Terms and Conditions having the same version date.

1 Definition and interpretations

1.1 Capitalized terms and expressions used in this Policy shall have the meaning defined herein or the meaning set out in section 1.1 of the Terms and Conditions.

2. Overview

2.1 This policy sets out how we process and store any Personal Information that we collect from you or that you provide to us through our Website or Services. We confirm that we will make all reasonable efforts to keep your information secure and that we will comply fully with all applicable UK and EU Data Protection legislation and regulations.

2.2 By registering on <https://bbbondemd.com> or participating in BigBlueButton meetings provided by us you are accepting and consenting to the practices described in this policy.

3. Audiences

3.1 There are three distinct groups of people who might use our services:

3.2 The Provider sets up BigBlueButton meetings and instances on behalf of a paying Customer under the terms set out in the Terms and Conditions.

3.3 The Customer then allows or enables Participants to join BigBlueButton meetings made available by the Provider to the Customer.

3.4 Visitors might simply browse our website but may or may not sign up and use the services.

3.5 This policy sets out slightly different rights for Customers, Participants and Visitors.

4. Participants

4.1 Some Personal Information that Participants may enter into the BigBlueButton meeting interface may be stored and processed by the Provider.

4.2 The login and usernames are transferred to the Provider but are *not* stored on our database. IP addresses of Participants are also not stored.

4.3 If the meeting is recorded, the voice contributions, video feed and uploaded content of Participants will be stored for processing into a video of the meeting. This *may* constitute Personal Information. Data relating to the recording is processed in the same data center as the meeting itself and then stored in an EU based datacenter (specifically, in the Netherlands). The Customer is responsible for deciding whether and how that video is shared; please refer to their Privacy

Policy for more details.

- 4.4 If the meeting is not recorded, no Personal Information regarding Participants is stored or processed.
- 4.5 If the Customer creates meetings only within the EU – no Personal Information about meeting Participants is transferred outside of the EU unless the Customer publishes a recording (which contains a Participants Personal Information) for viewing on the internet outside of the EU.

5. Customers

- 5.1 We collect information when you register on the site, including your name, email and company address. We also ask for credit card details which are stored by Stripe - but not by us.
- 5.2 We use information supplied by Customers in order to:
 - Add you to our mailing list, from which you may unsubscribe at will;
 - Communicate by email about your account or use of the service;
 - Billing – including transferring your credit card details to Stripe Inc.;
 - To improve our website or services to ensure that content is presented in the most effective manner for you and for your computer;
 - Security and debugging as part of our efforts to keep our Services safe and secure.
- 5.3 Some Customer data (but not credit card details) is stored in a cloud database which may include storage outside of the EU.

6. Visitors

- 6.1 Viewing our website with a web browser may create and make use of cookies as set out in our cookie policy. Cookie data is stored in a cloud database which may include storage outside of the EU.

7. Disclosure of your information

- 7.1 As set out in our Data Processing Agreement, we may share your data with other organizations that provide services on our behalf. We may do this to perform a contract we have entered into with you, where it is in our legitimate interests or with your consent. Examples of when we may share your data with service providers include sharing with:
 - Our online payments processor – Stripe - who process credit and debit card transactions on our behalf
 - A cloud hosting provider, Google Cloud, in order to run virtual computers used to provide our services.
 - Communications services providers, such as our mailing list management from Mail Chimp.
 - Google Analytics to understand how visitors engage with our website. Please see the Cookie Policy for more information.
- 7.2 We do not rent, sell or share personal information about you with other people or non-affiliated companies other than as set out in 7.1.

8. Processing of data

- 8.1 Data will be processed according to our Data Processing Agreement, even if that document is not signed by the Customer.

9. Limitations on internet security

- 9.1 Unfortunately, the transmission of information via the internet and the BigBlueButton software itself is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data.

10. Third party links

- 10.1 Our site may, from time to time, contain links to and from the third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

11. Access to your personal data – for Customers and Visitors

- 11.1 You have the right to ensure that your personal data is being processed lawfully. Your subject access rights can be exercised in accordance with data protection laws and regulations. Any subject access request must be made in writing to support@bbbondemand.com.
- 11.2 We will provide your personal data to you within the statutory time frames. To enable us to trace any of your personal data that we may be holding, we may need to request further information from you. If you have a complaint about how we have used your information, you have the right to complain to the Information Commissioner's Office (ICO).
- 11.3 The Customer and Visitor agree that their data will be processed and stored as set out in the Data Processing Agreement.

12. Access to your personal data – for Participants

- 12.1 The Participant agrees that with respect to their Personal Data, the Provider acts only as a Data Processor as defined in EU and UK Data Protection legislation. As such, the Provider is not responsible for Subject Access Requests or any other responsibilities which fall to the Data Controller.

13. Changes to our 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 by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

14. Summary of your Data Protection Rights

- 14.1 On the following page, we provide a summary of your Data Protection rights.
- 14.2 For Participants, requests arising from these rights should be addressed to the Customer - the organization who arranges your access to BigBlueButton meetings. For Visitors and Customers, requests should be addressed to support@bbbondemand.com

Your data protection rights

Under data protection law, you have rights including:

Your right of access You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organization, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we (or the Customer) has one month to respond to you.

If you are not satisfied by how we have handled your Personal Information, you can complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>