



PRIVACY POLICY – FULL STATEMENT as at 1 Jan 2020

INTRODUCTION

Roll Call Solutions Limited, located at 70 Mount Street, Heidelberg and its group companies (“Roll Call Group”) have a strong commitment to provide quality service to Employers (Clients) and their employees and are further committed to protecting your privacy.

Roll Call Solutions Limited has a Corporate Agreement with an Employer who is the Client. Employees will be subject to the privacy policies of their Employer in addition to that of Roll Call Solutions.

To ensure you can make informed decisions and feel confident about supplying personal data relating to you when using our services, we provide this policy statement outlining our data collection practices and the choices you have concerning how the data is being collected and used.

Our privacy policy will help you understand what information we collect at Roll Call Solutions, how we use it, and what choices you have.

When we refer to “Roll Call”, “we,” “our,” or “us” in this policy, we are referring to Roll Call Solutions Ltd, the company which provides the Services. When we talk about the “Services” in this policy, we are referring to our mobile workplace communication platform and web based admin portal. Our Services are currently available for use via a web browser or applications specific to your desktop or mobile device.

INFORMATION WE COLLECT AND RECEIVE

i) Client Data

Content and information submitted by users to the Services is referred to in this policy as “**Client Data.**” As further explained below, Client Data is controlled by the Company (your Employer, the “**Client**”) that has subscribed to our product. Where Roll Call Solutions collects or processes Client Data, it does so on behalf of the Client. “Client Data” can include, among other things, your name, contact number, address, age, gender, email address, photo and emergency contact details. It can also include messages (including those in chat groups and direct messages), pictures, videos, edits to messages or deleted messages, and other types of files.

If you create a user account, you are a “user,” as further described in the User Terms of Service. If you are using the Services by invitation of a Client, whether that Client is your employer,



another organization, or an individual, that Client determines its own policies regarding storage, access, modification, deletion, sharing, and retention of Client Data which may apply to your use of the Services. Please check with the Client about the policies and settings it has in place.

ii) Other information

Roll Call Solutions may also collect and receive the following information:

- **Account creation information.** Users provide information such as an email address, date of birth, Staff ID number, photo, emergency contacts, mobile number and password to create an account.
- **Company / Client information.** When a Client subscribes to Roll Call, we are provided with a list of all staff members and details such as title, department and office location.
- **Billing and other information.** For Clients that purchase a paid version of the Services, our corporate affiliates or a third party payment processors may collect and store billing address and credit card information on our behalf or we may do this ourselves.
- **Services usage information.** This is information about how you are accessing and using the Services, which may include administrative and support communications with us and information about staff members, features, content, and links you interact with, and what third party integrations you use (if any).
- **Contact information.** By using our Service, your Employer has required your contact information and job details to be shared within your organization.
- **Log data.** When you use the Services our servers automatically record information, including information that your browser sends whenever you visit a website or your mobile app sends when you are using it. This log data may include your Internet Protocol address, the address of the web page you visited before using the Services, your browser type and settings, the date and time of your use of the Services, information about your browser configuration and plug-ins, language preferences, and cookie data.
- **Device information.** We may collect information about the device you are using the Services on, including what type of device it is, what operating system you are using, device settings, application IDs, unique device identifiers, and crash data. Whether we collect some or all of this information often depends on what type of device you are using and its settings.
- **Geo-location information.** Precise GPS location from mobile devices is collected only with your permission. WiFi and IP addresses received from your browser or device may be used to determine approximate location. This information would only be accessed in the event of an emergency incident and you replying as “not safe” or not answering after a period of time.



- **Third party data.** Roll Call Solutions may also receive information from affiliates in our corporate group, our partners, or others that we use to make our own information better or more useful. This might be aggregate level information, such as which IP addresses go with which postcodes, or it might be more specific information, such as about how well an online marketing or email campaign performed.

Our Cookie Policy

Roll Call Solutions uses cookies and similar technologies like single-pixel gifs and web beacons, to record log data. We use both session-based and persistent cookies.

Cookies are small text files sent by us to your computer and from your computer or mobile device to us each time you visit our website or use our desktop application. They are unique to your account or your browser. Session-based cookies last only while your browser is open and are automatically deleted when you close your browser. Persistent cookies last until you or your browser deletes them or until they expire.

Some cookies are associated with your account and personal information in order to remember that you are logged in and which teams you are logged into. Other cookies are not tied to your account but are unique and allow us to carry out site analytics and customization, among other similar things. If you access the Services through your browser, you can manage your cookie settings there but if you disable some or all cookies you may not be able to use the Services.

Roll Call sets and accesses our own cookies on the domains operated by Roll Call Solutions and its corporate affiliates. In addition, we use third parties like Google Analytics for website analytics. You may opt-out of third party cookies from Google Analytics on its website. We do not currently recognize or respond to browser-initiated Do Not Track signals as there is no consistent industry standard for compliance.



HOW WE USE YOUR INFORMATION

We use your information to provide and improve the Services.

i) Client Data

Roll Call Solutions may access and use Client Data as reasonably necessary and in accordance with Client's instructions to (a) provide, maintain and improve the Services; (b) to prevent or address service, security, technical issues or at a Client's request in connection with client support matters; (c) as required by law or as permitted by the Data Request Policy and (d) as set forth in our agreement with the Client or as expressly permitted in writing by the Client. We do not sell or trade Client Data or any other Roll Call Solutions related application data with outside parties.

ii) Other information

We use other kinds of information in providing the Services. Specifically:

- **To understand and improve our Services.** We carry out research and analyze trends to better understand how users are using the Services and improve them.
- **To communicate with you by:**
 - **Responding to your requests.** If you contact us with a problem or question, we will use your information to respond.
 - **Sending emails and chat messages.** We may send you Service and administrative emails and messages. We may also contact you to inform you about changes in our Services, our Service offerings, and important Service related notices, such as security and fraud notices. These emails and messages are considered part of the Services and you may not opt-out of them. In addition, we sometimes send emails about new product features or other news about Roll Call. You can opt out of these at any time.
- **Billing and account management.** We use account data to administer accounts and keep track of billing and payments.
- **Communicating with you and marketing.** We may need to contact you for account management and similar reasons. We may also use your contact information for our own marketing or advertising purposes. You can opt out of these at any time.
- **Investigating and preventing bad stuff from happening.** We work hard to keep the Services secure and to prevent abuse and fraud.



This policy is not intended to place any limits on what we do with data that is aggregated and/or de-identified so it is no longer associated with an identifiable user or Client of the Services.

iii) Data Retention

We retain your information for no longer than necessary for the purpose for which it was collected. In determining how long your information will be stored, we will consider the purpose(s) and use of your information both now and in the future and what information we need to:

- best provide you with products and services;
- manage your relationship with us;
- meet our statutory obligations; and
- meet our customers' and previous customers reasonable expectations.

Your choices

i) Client Data

A Client provides us with instructions on what to do with Client Data. A Client has many choices and control over Client Data. For example, a Client may provision or deprovision access to the Services, enable or disable third party integrations, manage permissions, retention and export settings, transfer or assign teams or amend departments.

iv) Other information

If you have any questions about your information, our use of this information, or your rights when it comes to any of the foregoing, contact us at info@rollcallsolutions.com.

v) Other Choices

In addition, the browser you use may provide you with the ability to control cookies or other types of local data storage. Your mobile device may provide you with choices around how and whether location or other data is collected and shared. Roll Call Solutions does not control these choices, or default settings, which are offered by makers of your browser or mobile device operating system.

vi) Privacy Rights in Australia

If you are a resident of Australia, you may have a right pursuant to Privacy Act 1988 (Cth) (the "Privacy Act") to obtain certain information about the types of personal data that we store for direct marketing. We do not share your data with third parties.



Please contact us at info@rollcallsolutions.com if you would like to exercise any of your rights in relation to your personal data.

vii) Data Rights in the European Economic Area (“EEA”)

For citizens of the EEA, the following rights apply:

- to request access to your information and information related to our use and processing of your information;
- to request the correction of your information (we may seek to verify the accuracy of the personal information before rectifying it);
- in certain situations to ask us to erase, block or restrict the personal information we hold about you, or object to particular ways in which we are using your personal information; and
- in certain situations, you can also ask us to send the personal information you have given us to a third party.
- to ask to obtain a copy of, or reference to, the safeguards under which your personal information is transferred outside of the EEA.
- to withdraw your consent to our use of your information at any time where we rely on your consent to use or process that information. This will not affect the lawfulness of our processing of your data prior to your withdrawal;
- to object to the processing of your information for certain purposes, namely:
 - to us using or processing your information where we use or process it in order to carry out a task in the public interest or for our legitimate interests;
 - to object to us using or processing your information for direct marketing purposes. You may also exercise your right to object to us using or processing your information for direct marketing purposes.

You can exercise your rights by writing to us at Roll Call Solutions Ltd, 17 Leighton Road, Causeway Bay, Hong Kong. You have a right to lodge a complaint with your local supervisory authority if you have concerns about how we are processing your personal information. We ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time.



SHARING AND DISCLOSURE

There are times when information described in this privacy policy may be shared by Roll Call. This section discusses only how Roll Call may share such information. Clients determine their own policies for the sharing and disclosure of Client Data. Roll Call does not control how Clients or their third parties choose to share or disclose Client Data.

i) Client Data

Roll Call may share Client Data in accordance with our agreement with the Client and the Client's instructions, including:

- **With third party service providers and agents.** We may engage third party companies or individuals to process Client Data.
- **With affiliates.** We may engage affiliates in our corporate group to process Client Data.
- **With third party integrations.** Roll Call may, acting on our Client's behalf, share Client Data with the provider of an integration added by Client. Roll Call Solutions is not responsible for how the provider of an integration may collect, use, and share Client Data.
- **With Emergency Services.** Roll Call may be required to provide your location and contact information to emergency services providers in the event of an incident. We will do this only if given permission by the Client.

ii) Other information

Roll Call may share other information as follows:

- **About you with the Client.** There may be times when you contact Roll Call to help resolve an issue specific to a department of which you are a member. In order to help resolve the issue and given our relationship with our Client, we may share your concern with our Client.
- **With third party service providers and agents.** We may engage third party companies or individuals, such as third party payment processors, to process information on our behalf.
- **With affiliates.** We may engage affiliates in our corporate group to process other information.

iii) Other types of disclosure

Roll Call may share or disclose Client Data and other information as follows:



- **During changes to our business structure.** If we engage in a merger, acquisition, bankruptcy, dissolution, reorganization, sale of some or all of Roll Call's assets, financing, acquisition of all or a portion of our business, a similar transaction or proceeding, or steps in contemplation of such activities (e.g. due diligence).
- **To comply with laws.** To comply with legal or regulatory requirements and to respond to lawful requests, court orders and legal process.
- **To enforce our rights, prevent fraud and for safety.** To protect and defend the rights, property, or safety of us or third parties, including enforcing contracts or policies, or in connection with investigating and preventing fraud.

We may disclose or use aggregate or de-identified information for any purpose. For example, we may share aggregated or de-identified information with our partners or others for business or research purposes like telling a prospective Roll Call Client the average number of messages sent within a day or partnering with research firm or academics to explore interesting questions about workplace communications.

Security

Roll Call takes security seriously. We limit the collection, use and retention of the Data to the specific information we need for legitimate purposes to administer our business, to provide you with a quality service. We take appropriate steps to protect Data collected against unauthorised access, disclosure or alteration, and to keep such Data up to date.

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential. In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology.

Internal Controls

The Roll Call Group companies train their employees and staff on the importance of Data privacy and protection. Our privacy policy is updated as required to reflect any changes in applicable laws and developments in best practice procedures. Further, we limit the number of individuals within the companies with access to Data to those directly involved in the process of providing quality service to you.



Children's information

Our Services are not directed to children under 13. If you learn that a child under 13 has provided us with personal information without consent, please contact us.

Changes to this Privacy Policy

We may change this policy from time to time, and if we do we will post any changes on this page. If you continue to use the Services after those changes are in effect, you agree to the revised policy.

LEGAL DISCLAIMER

This privacy statement complies with the Personal Data (Privacy) Ordinance of the Hong Kong Special Administrative Region as well as applicable local laws. Roll Call has self-certified to the EU-U.S. and Swiss-U.S. Privacy Shield frameworks set forth by the U.S Department of Commerce with respect to collection, use and retention of Client Data. Roll Call has also self-certified to the Australian Privacy Principles (APPs), which are contained in schedule 1 of the Privacy Act 1988 (Privacy Act)

As an international business with operations in different parts of the world, we may need to disclose Data when required by relevant law or court order, or as requested by other government or law enforcement authorities. This also applies when we have reason to believe that disclosing the Data is necessary to identify, investigate, protect, contact or bring legal action against someone who may be causing interference with our guests, visitors, associates, rights or properties (including this site), or to others, whether intentionally or otherwise, or when anyone else could be harmed by such activities.

CONTACTING ROLL CALL SOLUTIONS

Please also feel free to contact us if you have any questions about Roll Call's Privacy Policy or practices. You may contact us at info@rollcallsolutions.com