

Robin App – Privacy Policy

Policy version: 10 July 2023

Robin app (**the app**) is provided by nDuo Ltd, a company registered in England and Wales with company number 07805101, registered office address 320-324 City Road, London, United Kingdom EC1V 2NZ (**'we', 'our' or 'us'**).

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on how and why we collect, store, use and share any information relating to you (**your information**).

It also explains your rights in relation to your information and how to contact us or the relevant regulator in the event you have a complaint. Our collection, storage, use and sharing of your information is regulated by law, including under the UK General Data Protection Regulation (**UK GDPR**).

We are the controller of your information obtained via the app, meaning we are the organisation legally responsible for deciding how and for what purposes it is used.

If you are aged under 13 you must not use the app as it is not designed for you. We do not intend to collect the information of anyone under 13. If you are aware that any information of anyone under 13 has been shared with the app, please let us know so that we can delete that data.

If you are aged under 18, we recommend that you speak to an adult that you trust if you have any difficulties reaching an informed decision regarding the activation of any use of your information or our treatment of your information.

What this policy applies to

This privacy policy relates to your use of the app only.

The app provides independent compliance and security checks and the possibility for a tech team to do simple tasks on Jamf Pro or Microsoft Endpoint Management (Intune). E.g. wipe machine, lock machine, push updates and the ability for users to scan/tag their business devices with ease (Asset Tagging). These other apps, websites or services may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to these other apps, websites or services, please consult their privacy policies as appropriate.

Information from the Jamf Pro or Microsoft Endpoint Management (Intune) systems and Google is not accessible by or shared with us.

Information we collect about you

We collect and use the following information about you:

Category of data	In more detail
Identify the data you provide when you register through the app. Registration and	—your name, email address and company size, information relating to your devices for example, device type, model, operating system, when updates were last installed, the number of devices you use and whether your account is still active and operating within a permitted licence,

Category of data	In more detail
provision of this data is optional	

You can choose if you want to give us your information and let us use it. Where that is the case, we will tell you and give you the choice before you give the information to us. We will also tell you whether declining to share the information will have any effect on your use of the app or our services.

We collect and use your information for the purposes described in the section '**How and why we use your information**' below.

How your information is collected

We collect your registration information from you directly when you input it into the app. We do not collect any other personal data from you.

How and why we use your information

Under data protection law, we can only use your information if we have a proper reason, eg:

- where you have given consent
- to comply with our legal and regulatory obligations
- for the performance of a contract with you or to take steps at your request before entering into a contract, or
- for our legitimate interests or those of a third party

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own. You can obtain details of this assessment by contacting us (see '**How to contact us**' below).

The table below explains what we use your information for and why.

What we use your information for	Our reasons
Create and manage your account with us	For our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you
Providing services and/or the functionalities of the app to you	Depending on the circumstances: —to perform our contract with you or to take steps at your request before entering into a contract —for our legitimate interests, ie to be as efficient

What we use your information for	Our reasons
	as we can so we can deliver the best service to you
To enforce legal rights or defend or undertake legal proceedings	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> —to comply with our legal and regulatory obligations —in other cases, for our legitimate interests, ie to protect our business, interests and rights
Communications with you not related to marketing, including about changes to our terms or policies or changes to the app or service or other important notices	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> —to comply with our legal and regulatory obligations —in other cases, for our legitimate interests, ie to provide the best service to you
Protect the security of systems and data used to provide the app and its services	<p>To comply with our legal and regulatory obligations</p> <p>We may also use your information to ensure the security of systems and data to a standard that goes beyond our legal obligations, and in those cases our reasons are for our legitimate interests, ie to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us</p>
Operational reasons, such as improving efficiency, training and quality control or to provide support to you	For our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you
Statistical analysis to help us understand our customer base	For our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you
Updating and enhancing customer records	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> —to perform our contract with you or to take steps at your request before entering into a contract —to comply with our legal and regulatory obligations —where neither of the above apply, for our legitimate interests, eg making sure that we can keep in touch with our customers about existing

What we use your information for	Our reasons
	orders and new products
Disclosures and other activities necessary to comply with legal and regulatory obligations, eg to record and demonstrate evidence of your consent to our use of your information where relevant	To comply with our legal and regulatory obligations
Marketing our services to existing and former customers	For our legitimate interests, ie to promote our business to existing and former customers See ' Marketing ' below for further information.
To share your information with members of our group and third parties that will or may take control or ownership of some or all of our business (and professional advisors acting on our or their behalf) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency In such cases, information will be anonymised where possible and only shared where necessary	Depending on the circumstances: —to comply with our legal and regulatory obligations —in other cases, for our legitimate interests, ie to protect, realise or grow the value in our business and assets

How and why we use your information—sharing

See '**Who we share your information with**' for further information on the steps we will take to protect your information where we need to share it with others.

Marketing

We will use your information to send you updates by email about our products and services, including exclusive offers, promotions or new products or services.

We have a legitimate interest in using your information for marketing purposes (see above '**How and why we use your information**'). This means we do not need your consent to send you marketing information. If we change our marketing approach in the future so that consent is needed, we will ask for this separately and clearly.

You have the right to opt out of receiving marketing communications at any time by:

- contacting us at hello@nduo.co.uk
- using the 'unsubscribe' link in emails.

We will always treat your information with the utmost respect and never share it with other organisations for marketing purposes.

For more information on your right to object at any time to your information being used for marketing purposes, see '**Your rights**' below.

Who we share your information with

We routinely share your information with third party service providers we use to help us run our business or provide the services or functionalities in the app, including Slack, Zendesk and Google.

We only allow the companies referred to above to handle your information if we are satisfied they take appropriate measures to protect your information. We also impose contractual obligations on service providers to ensure they can only use your information to provide services to us and to you.

We or the third parties mentioned above occasionally also need to share your information with:

- our or their professional advisors (such as lawyers and other advisors)—the recipient of the information will be bound by confidentiality obligations
- law enforcement agencies, courts or tribunals and regulatory bodies to comply with legal and regulatory obligations
- other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency—usually, information will be anonymised but this may not always be possible. The recipient of any of your information will be bound by confidentiality obligations

We will not share your information with any other third party.

Who we share your information with—further information

If you would like more information about who we share your information with and why, please contact us (see '**How to contact us**' below).

How long your information will be kept

We will retain your information for so long as you are a registered user of the app and for 5 years after you end your registration. At the end of this period, we will delete or anonymise your information.

Transferring your information out of the UK

Countries outside the UK have differing data protection laws, some of which may provide lower levels of protection of privacy.

It is sometimes necessary for us to transfer your information to countries outside the UK. In those cases, we will comply with applicable UK laws designed to ensure the privacy of your information.

We will transfer your information from the UK to our service providers located outside the UK

Under data protection laws, we can only transfer your information to a country outside the UK where:

- the UK government has decided the particular country ensures an adequate level of protection of your information (known as an '**adequacy regulation**') further to Article 45 of the UK GDPR

- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for you, or
- a specific exception applies under relevant data protection law

We transfer your information outside the UK to the following countries based on adequacy regulations:

EEA (Ireland)

We transfer your information outside the UK to the following countries based on legally-approved standard data protection clauses recognised or issued further to Article 46(2) of the UK GDPR:

United States of America

In the event we cannot or choose not to continue to rely on either of those mechanisms at any time, we will not transfer your information outside the UK unless we can do so on the basis of an alternative mechanism or exception provided by UK data protection law.

Any changes to the destinations to which we send your information or in the transfer mechanisms we use to transfer your information internationally will be notified to you in accordance with the section on **'Change to this privacy policy'** below.

If you would like further information about data transferred outside the UK, please contact us (see **'How to contact us'** below).

Your rights

If you are located in the UK or EEA, you generally have the following rights, which you can usually exercise free of charge:

Access to a copy of your information	The right to be provided with a copy of your information
Correction (also known as rectification)	The right to require us to correct any mistakes in your information
Erasure (also known as the right to be forgotten)	The right to require us to delete your information—in certain situations
Restriction of use	The right to require us to restrict use of your information in certain circumstances, eg if you contest the accuracy of the data
Data portability	The right to receive your information that you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object to use	The right to object: —at any time to your information being used for direct marketing (including profiling)

	—in certain other situations to our continued use of your information, eg where we use your information for our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims
Not to be subject to decisions without human involvement	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you We do not make any such decisions based on data collected by the app
The right to withdraw consents	If you have provided us with a consent to use your information, you have a right to withdraw that consent easily at any time You may withdraw consents by emailing us at hello@nduo.co.uk Withdrawing a consent will not affect the lawfulness of our use of your information in reliance on that consent before it was withdrawn

For further information on each of those rights, including the circumstances in which they do and do not apply, please contact us (see ‘**How to contact us**’ below). You may also find it helpful to refer to the [guidance from the UK’s Information Commissioner](#) on your rights under the UK GDPR, or if you are in the EEA, guidance from your local data protection authority.

If you would like to exercise any of those rights, please email, call or write to us—see below: ‘**How to contact us**’. When contacting us please:

- provide enough information to identify yourself your (full name and email address) and any additional identity information we may reasonably request from you, and
- let us know which right(s) you want to exercise and the information to which your request relates.

Keeping your information secure

We have appropriate security measures to prevent your information from being accidentally lost, or used or accessed unlawfully. We limit access to your information to those who have a genuine business need to access it.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to complain

Please contact us if you have any queries or concerns about our use of your information (see below 'How to contact us'). We hope we will be able to resolve any issues you may have.

If you are based in the UK, you also have the right to lodge a complaint with the Information Commissioner. The Information Commissioner can be contacted using the details at <https://ico.org.uk/make-a-complaint> or telephone: 0303 123 1113.

If you are located outside the UK, you may be able to make a complaint to your local data protection authority and you may have additional rights in relation to your personal data.

Changes to this privacy policy

We may change this privacy policy from time to time. When we make significant changes we will take steps to inform you, for example via the app or by other means, such as email.

How to contact us

You can contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

Our contact details
By email: hello@nduo.co.uk
By phone number: 020 347 3646
By mail: 320-324 City Road, London, United Kingdom EC1V 2NZ