

At bluesource, we are committed to protecting and respecting your privacy.

Your privacy is important to us and this privacy policy (“Policy”) explains what personally identifiable information (“PII”) we collect from you, why we need it, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

We may change this Policy from time to time, so please occasionally check this Policy, available at www.bluesource.co.uk, to ensure that you are happy with any changes. By using our website, you are agreeing to be bound by this Policy.

Any questions regarding this Policy and our privacy practices should be sent to privacy@bluesource.co.uk or by writing to Operations, bluesource Information Limited, London, SE1 2TU. Alternatively you can telephone 020 7940 6200.

Who are we?

bluesource Information Limited is a private limited company registered in England under, number 4064193, with our registered office at: 122 Tooley Street, London, SE1 2TU. The Company comprises of bluesource Information Limited and its trading subsidiaries.

How do we collect information from you?

Information you give us

We obtain information about you when you visit our website, register with bluesource, subscribe to one of our news feeds (via the website or follow us from LinkedIn or Twitter, etc.), enter promotions or for example when you contact us about products and services. We may also be passed your information from certain bluesource partners, in relation to our products and services and assume that any necessary consents have been received from the data controller.

If you subscribe to one of our services or buy goods from us (collectively considered a “Service”), you will also be asked to supply PII for the purpose of using the Service and us being able to supply and deliver the applicable Services, and to also fulfill any contractual commitment or legislative requirement, such as for fraud prevention. PII may be collected directly or via a contract, service schedule, order form, email or other such document.

We may combine information about you that we have with information we obtain from different Services we provide to you or your company.

Information we get from the use of our services

In addition to the above, PII may also be contained within documentation/correspondence received in the course of discussing or providing Services, such as a named individual in a project brief, proposal, quotation, contract, or other such document between your company and bluesource (collectively “Documents”).

When you use our services we may automatically collect and store certain information in server or application logs, which may include:

- Details of when you accessed the Service;

- Telephony log information, such as your phone number, calling-party number, forwarding numbers, time and date of calls, duration of calls, SMS routing information and types of calls. your access from a security perspective;
- IP address used to access the Service; and
- Cookies that may uniquely identify your browser, search engine or preferences. (please refer to Bluesource’s Cookie Policy for further information, available at www.bluesource.co.uk).

Our servers and MS Azure instances are located within the UK. If you choose to provide us with personal information, you are consenting to the transfer and storage of that information in such locations and elsewhere we have facilities. We will endeavor to use facilities and services based in the UK and EU, wherever possible.

What type of information do we collect from you?

The PII we collect from you will be appropriate, specific and minimalized for the purpose required. We will not ask for sensitive information (such as date of birth, gender, race, religion, sexual orientation or health), unless this is absolutely necessary for a specific service or we are required to monitor equality, or comply with the Modern Slavery Act, or similar legislation, etc.

The following PII is typically collected, where appropriate, and for the following reasons:

Name	to verify identity and identify you as an individual
Company name	to relate you to a specific company
Work contact details	Work address, work email, work telephone number, work mobile number are processed in day to day in communications to and from you and may be used, together with your name in documentation produced during the relationship between us and you.
Job title/role	used to specify the role within the company that you perform and to apply relevant responsibilities and controls, as well as to communicate to the most appropriate person
Department	used to specify the department you work in and to apply relevant responsibilities, benefits and controls, as well as to communicate to individuals at a departmental level
Login Names	used to authenticate and track access to services for information security purposes, including access control, and provide individual accountability to such access.
IP Address	The IP address of a device used to access or approve services, such as signing documents on behalf of the company, may be logged for information security and compliance purposes
Cookies	Cookies may track access to certain Company websites. Please refer to the Company’s Cookie Policy for more details
Signature	for the approval of transactions between the Parties.

We will not ask for sensitive information (such as date of birth, gender, race, religion, sexual orientation or health), unless this is absolutely necessary for a specific service or we are required to monitor equality, or comply with the Modern Slavery Act, or similar legislation, etc.

How we use the information about you?

We process this data for the purposes described in this Policy, namely:

- Where we act as a “Data Processor”, as defined under the Data Protection Act 2018 (“DPA”) and the General Data Protection Regulation (“GDPR”), and we are responsible for processing data for the purpose of supplying services to you (i.e. your company). We will process the company data, which may contain PII, in accordance with the provisions of the DPA and GDPR and under the instruction of the “Data Controller”, which is typically your company. Contractual consent is therefore required for using PII for the purpose of supplying services and maintaining the relationship with your Company.
- A reference named in a Document produced in the course of a relationship between yourself or your company with bluesource;
- Improve security by protecting against fraud and abuse;
- Identify an individual requesting access to information or services;
- Resolve disputes, troubleshoot problems and enforce our policies;
- Communicate with you about service updates and information;
- Provide you with information updates that you have signed up to receive;
- Customise your experience;
- Conduct analytics and measurement to understand how our services are used;
- Improve the quality of our services and develop new ones;
- Advise you of products and services which may be of interest based upon searches and current subscribed services, or previous consented interest;
- When you contact bluesource, we may keep a record of your communication to help solve any issues you might be facing, such as on our call logging software. We may also use your email address to inform you about our services, such as letting you know about upcoming events, changes or improvements; and
- To gather feedback about our products and services.

As a global company, bluesource may process PII on our systems and servers around the world. We may process your personal information on a server located outside the country where you live, however we endeavor to store and host such systems and servers within the United Kingdom and the European Economic Union.

We will ask for your consent before using information for a purpose other than those set out in this Privacy Policy.

We retain your PII as long as it is necessary and relevant for our operations or to comply with relevant laws. In addition, we may need to retain PII after termination of our relationship with you to comply with laws or legislation, prevent fraud, collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigation, enforce our policies and agreements and take other actions permitted or required by applicable laws.

Transparency

People have different privacy concerns and our goal is to be clear about what information we collect and why we need it, so that you can make a meaningful informed choice on providing it to us.

We will not request, capture or store PII which is considered unnecessary for the consented purpose.

Accessing and updating your personal information

As bluesource does not currently provide services via a portal which will give you access to your personal information, if the information we hold about you is wrong, needs to be updated or deleted, please email the details to privacy@bluesource.co.uk so we can update the necessary information - unless we have to keep that information for legitimate business, compliance or legal purposes. When updating your personal information, we may ask you to verify your identity before we can act on your request.

If you are acting for the data controller (i.e. on behalf of your company, etc.), and need to update PII about individuals that have been passed to us through the course of the relationship between the parties, please email privacy@bluesource.co.uk. You will need to be a named contact for the company on our records and the instruction will need to be clearly identifiable who it has come from. We may ask you to verify your identity before we can act on your request.

We may reject requests that are unreasonably repetitive, require disproportionate technical effort (for example, developing a new system or fundamentally changing an existing practice), risk the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup systems or references to an individual within historical support tickets, historical accounting information or within individual historical Documents, that are still required for retention for legitimate business reasons).

Where we can provide information access and correction, we will do so free of charge, except where it would require a disproportionate effort. We aim to maintain our services in a manner that protects information from accidental or malicious destruction, which is further described below under Information Security.

Information that we share

bluesource does not rent, sell, or share PII with other people or nonaffiliated companies except to provide products or services you've requested, when we have your permission, or under the following circumstances:

- **For Contractual consent** (rather than explicit, freely given individual consent) necessary to be able to provide the Service. For example, if your company has taken out a support service with us and has escalated an issue to us, we will have contractual consent to process your PII that has been given to us, for the purpose of resolving the issue that is affecting you. Without this consent at a contractual level, we would be unable to reasonably provide the Service to you, or your company.
- **For external processing:**
 - Where we need to provide certain information to trusted partners and subcontractors, working on behalf of, or with bluesource, under contractual and confidentiality agreements, to deliver part or all of the Service. Such information shall be the minimum required for that purpose. For example, if we have to escalate your support issue to Microsoft, for their assistance in resolving it, we may need to provide certain PII related to yourself or an individual within your company, such as contact details. These companies do not have any independent right to share this information;
 - To assist bluesource communicate with you about offers from bluesource and our marketing partners, where any necessary consents have been freely given. These companies do not have any independent right to share this information.
- **For Legal reasons**

We will share PII with companies, organisations or individuals outside of bluesource if we believe in good faith that access, use, preservation or disclosure of the information is reasonably necessary to:

- Response to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims;

- Meet any applicable law, regulation, legal process or enforceable government request;
- Enforce applicable terms of service and to investigate potential violations;
- Detect, prevent and address fraud, security and technical issues;
- Protect against harm to the rights, property or safety of bluesource, our workers, our customers, our suppliers, or the public, as required or permitted by law;
- Meet our obligations under DPA and GDPR to report breaches to the data controller and where we are acting as the controller, to the relevant supervisory authority (which is the Information Commissioners Office for the UK).

We limit access to PII to those employees, partners and subcontractors we believe reasonably need to come into contact with that information to provide Services to you, or your company, in order to do their jobs. We have a “who needs to know, minimum rights” policy to such access.

If we are involved in a merger, acquisition or asset sale, we will continue to ensure the confidentiality of any personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

We may share non PII information publically and with our partners. Where we have permission to do from your company, this may include details of the company name, location, business sector and other non PII, non-confidential information. For example, we may share information publically to show service statistics and trends.

Whenever we share personal data, we take all reasonable steps to ensure that it is treated securely and in accordance with this privacy policy.

Information Security

We work hard to protect bluesource and the information we are entrusted to look after from unauthorised access, unauthorised alteration, unauthorised disclosure or unauthorised destruction. We ensure your PII’s integrity, availability and confidentiality are suitably protected.

We have implemented an information security management system (“ISMS”) which is certified annually to the ISO27001 standard to achieve this.

Unfortunately, no data transmission over the Internet or any other network can be guaranteed as 100% secure. As a result, while we strive to protect your personal data, we cannot ensure and do not warrant the security of any information you transmit to us, and this information is transmitted at your own risk.

If you have been given log-in details to provide you with access to certain Services (for example software as a service type services), you are responsible for keeping those details confidential.



When this Privacy Policy applies

This Policy applies to all the services offered by bluesource Information Limited and its affiliates, including bluesource Inc., except for services that have separate privacy policies that do not incorporate this Policy.

It does not apply to the practices of companies that bluesource does not own or control, or to people that bluesource does not employ or manage.

Where partners or subcontractors are engaged to perform parts or all of a Service, bluesource, acting as a data processor, is responsible for ensuring that the same data protection obligations, as set out by this Policy, a contract, or other legal act between the data controller and bluesource, shall be imposed on that other processor by way of a contract, or other legal act, in particular providing sufficient guarantees to implement appropriate technical and organisational measures in such a manner that the processing meet the requirements of the DPA/GDPR as appropriate.

Our Policy does not cover the information practices of other companies and organisations that advertise our services.

Compliance and cooperation with regulatory authorities

We regularly review our compliance with our Privacy Policy as part of our ISMS and with the requirements of the DPA and GDPR.

Should I have a complaint, how do I report it?

To make it easy for our customers to raise a complaint, in the unlikely event they need to, we have a single email address that can be used complaints@bluesource.co.uk. We will determine whether the complaint is service, compliance or HR related and engage the necessary individuals to deal with the complaint for you.

Changes

bluesource may update this Policy. We will notify you about significant changes in the way we treat PII by sending a notice to the primary contact's email address specified in your company's account with us, or by placing a prominent notice on our website site.

Questions and Suggestions

If you have questions or suggestions, please complete a feedback form or you can contact us at: privacy@bluesource.co.uk.