

Privacy Policy

This Privacy Policy sets out how The Completion App Ltd (“we”, “us” and “our”) collects and uses personal data of visitors to this website, www.thecompletionapp.com (the “Website”) and our web app at app.thecompletionapp.com (the “Web App”) (the Website and the Web App together, “Our Site”). We will only collect and use personal data in ways that are described here, and in accordance with applicable law.

Please read this Privacy Policy carefully and ensure that you understand it. If you do not agree to our use of your personal data in the manner set out in this Privacy Policy, we recommend that you stop using Our Site immediately.

1. Definitions and Interpretation

In this Privacy Policy the following terms shall have the following meanings:

“Account”	means an account required to access the Web App; and
“Cookie”	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in Part 15, below.

2. Information About Us

Our Site is owned and operated by The Completion App Ltd, a limited company registered in England under company number 13053847.

Registered address: 24 Spicer Road, Exeter, England, EX1 1SY.

VAT number: 368 9690 26.

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

4. What Is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This

Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 16.

- b) The right to access the personal data we hold about you. Part 14 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 16 to find out more.
- d) The right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 16 to find out more.
- e) The right to restrict the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent (in circumstances where we are relying on your consent as the legal basis for using your personal data).
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 16.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. However, we would welcome the opportunity to resolve your concerns ourselves; to enable us to do so, please contact us first, using the details in Part 16.

6. Our Roles

The Completion App Ltd acts as a data controller in respect of the personal data we collect in relation to users of the Website (“**Website Users**”) and registered users of the Web App (i.e. employees of our customers) (“**App Users**”) in order to provide our customers with an electronic signing application via the Web App and to give each App User access to our system.

The Completion App Ltd acts as a data processor in respect of the personal data we collect in relation to any person added to a signing pack as a recipient (as a signatory of documentation) or as an approver (a legal representative of a signatory or other third party stakeholder with approval access to a signing pack) (each an “**End User**”) and in these circumstances, we process the personal data of End Users in order to provide our customers with an electronic signing application via the Web App. Our customer acts as the data controller in relation to End User personal data and is responsible for ascertaining the legal basis for which the personal data is processed. When acting as a data processor, we only process End User personal data in accordance with the instructions of our customers, the data controllers.

7. What Data Do We Collect and How?

Depending upon your use of Our Site, we may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. Please also see Part 15 for more information about our use of Cookies and similar technologies. We do not collect any ‘special category’ or ‘sensitive’ personal data or data relating to criminal convictions and/or offences.

Data Collected	How We Collect the Data
Website Users	
Identity information including name.	Completion by you of ‘Contact us’ form on the Website.
Contact information including name, email address and telephone number.	Completion by you of ‘Request a Demo’ or ‘Subscribe’ forms on the Website.
Business information including name, role and telephone number.	Completion by you of ‘Request a Demo’ form on the Website.
Technical information including IP address, browser type and operating system information.	Website logs.
App Users	
Profile information including role, login details and telephone number.	Profile information added by the relevant customer’s administrator / individual Web App Users by data entry in the Web App.
Data from third parties including Web App User’s name and email address	App User’s name and email address provided through data entry into the Web App by the relevant customer’s administrator for the purposes of inviting an authorised user to access the system.
Technical information including IP address, browser type and operating system.	Website logs.

Usage data	Website logs.
End Users	
Name and email address of End Users designated as recipients (including each document signatory) and approvers of a signing pack.	Document signatory/witness information provided by Web App User by data entry as part of signing pack set up process.
Name and email address of End Users designated as an appointed witness by a document signatory in connection with a signing pack.	Information provided by another End User by data entry in the Web App.
Address and occupation of End Users designated as recipients (including each document signatory and/or witness).	Information provided directly by End Users by data entry in the Web App.
Technical information including IP address, browser type and operating system.	Website logs.
Usage data.	Website logs.

8. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. As set out above, where we are acting as a data controller, it is our responsibility for determining the lawful basis. However, where we are acting as a data processor, it is our customer (the data controller) who is responsible for determining the lawful basis.

The lawful basis on which we collect, use and store personal data for is in performance of a contractual obligation and/or where there is a legitimate interest for doing so.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and/or telephone and/or post with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 16.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

9. **How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Details of our retention periods are available in our retention policy which is available upon request by contacting us at contact@thecompletionapp.com.

10. **How and Where Do You Store or Transfer My Personal Data?**

We may store some of your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation.

We may store some or all of your personal data in countries outside of the UK. These are known as “third countries”. We will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

We will only store or transfer personal data in or to countries that are deemed to provide an adequate level of protection for personal data. For further information about adequacy decisions and adequacy regulations, please refer to the [Information Commissioner’s Office](#).

Please contact us using the details below in Part 16 for further information about the particular data protection safeguards used by us when transferring your personal data to a third country.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner’s Office where we are legally required to do so;
- encryption of End User personal data fields;
- web communication to and from our web site is protected by the industry standard latest encryption TLS 1.3;
- the administration communication to our servers (SSH) is protected by one of aes128-ctr, aes192-ctr or aes256-ctr; and
- back-ups are encrypted at rest with AES 256 encryption.

11. **Do You Share My Personal Data?**

It may be necessary to share your personal data with the following third parties for the reasons set out below:

- Service Providers – we may need to share your data with third party service providers including IT / hosting providers, customer support, two factor authentication service providers. In these circumstances we ensure that our contracts with the service providers include appropriate data protection provisions.
- Regulatory / governmental authorities – we may need to share your data with HMRC or other regulatory or governmental authorities if we are involved in legal proceedings or to comply with legal obligations, a court order, or the instructions

of a government authority.

- Professional accountants – we may need to share your data with our lawyers, accountants, auditors, insurers or other professional advisers.
- Acquirers/potential acquirers - if we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

We will not share any of your personal data with any third parties for any purposes, save as set out above.

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 10.

If any personal data is transferred outside of the UK, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 10.

12. **How Can I Control My Personal Data?**

In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via Our Site, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails, at the point of providing your details and for Web App users, by managing your Account).

13. **Can I Withhold Information?**

You may access certain areas of Our Site without providing any personal data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

You may restrict our use of Cookies. For more information, see Part 15 and our Cookie Policy www.thecompletionapp.com/docs/cookiepolicy.pdf.

14. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 16. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible. To request a copy of the form, please contact contact@thecompletionapp.com.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

Normally, we aim to provide a complete response, including a copy of your personal data within one month of receiving it. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

15. **How Do You Use Cookies?**

Our Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve our services.

By using Our Site, you may also receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than us. Our Site uses analytics services provided by Google LLC, which also use Cookies. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling us to better understand how people use Our Site. For more details, please refer to our Cookie Policy www.thecompletionapp.com/docs/cookiepolicy.pdf.

16. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: contact@thecompletionapp.com.

Postal Address: 24 Spicer Road, Exeter, England, EX1 1SY

17. **Changes to this Privacy Policy**

We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on the 31st July 2023.