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There is also an interactive format at [www.juralio.com/privacy](http://www.juralio.com/privacy)

# Privacy notice

This notice explains how we handle personal information we control.

Our aims include respect for people's privacy, and making this notice clear and succinct.

Questions or ideas for improvement are welcome.

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## About

### Who we are

We are the Juralio group of companies, comprising Juralio Technology Ltd (*Scottish company number SC571514*) and its parent company, Juralio Ltd (*Scottish company number SC441468*).

In this notice, the words 'we', 'our' and 'us' refer to both or each of Juralio Technology Ltd and Juralio Ltd or, where the context requires, to a particular one of them.

Our offices are at Unit 8, 20 Greenmarket, Dundee DD1 4QB, Scotland.

We make the Juralio software product, described on the website, Juralio.com

The website Juralio.com is operated by Juralio Technology Ltd. Our customers contract with Juralio Technology Ltd. Our staff are employed by Juralio Ltd. Our suppliers may have contracts with either depending on the circumstances.

The following sections indicate which company or companies is or are the data controllers in different contexts.

### How to contact us

Please email us at [info@juralio.com](mailto:info@juralio.com)

### What we mean by "personal information"

We mean information relating to an identified or identifiable individual – this may be referred to as “personal data” or “personally identifiable information”.

Simple examples include your name, email address, phone number, the organisation you work for and your role there. An example of personal information relating to an identifiable individual may be an IP address used by you.

The **Scenarios** section of this notice indicates types of personal information we may collect in particular contexts. The **Policies** section mentions certain types of personal information which we aim not to collect.

**Note:** we generally don't process sensitive personal information (*also known as “special category personal data”*)

- That means things like health information, ethnic origin, political views and other information which is more sensitive than usual. For more detail, see [this explanation](#) by the UK Information Commissioner's Office.
- If for some specific reason (*e.g. in a recruitment context*) we intend to collect any personal information of that type, we will consider carefully whether we really need it, ask you specifically in advance, and make sure you know why we believe we need it.
- If it is agreed that such information may be stored in our software product, we will address this topic specifically in our contract with our customer.
- You should not store such personal information (including any sensitive personal information) in our product unless expressly permitted in such a contract (as indicated to you by your employer if they're our customer or, if not, by the other person who permits you access to their Juralio instance).

### What this notice covers

This notice explains how we treat personal information which we control.

- What we collect
- Why we do so
- How we handle it
- Our lawful reasons (a data protection law concept)
- Our broader policies

The **Scenarios** section tells you how we approach particular situations. The **Policies** section explains our approach more generally.

## ○ This notice doesn't cover information we process but don't control

This notice **doesn't** cover personal information which we process on behalf of the person who controls it.

With respect to personal information processed in our software product, Juralio:

- We control limited personal information necessary for sign up and log-in purposes, our billing and invoicing purposes, other product technical purposes, such as whether a particular user's account was activated.
- But we're typically not the controller of information which users of our product add to it. The controller of such information will typically be our customer. You should consult them, or their privacy notice or policy, with any queries about their handling of personal information which they control.

 **This notice was last updated on 20 June 2022**

We record changes. Please get in touch if a prior version is relevant to you.

## Scenarios

### When you just browse our website, we don't collect personal information

If you go beyond browsing and contact us via this website, please see the scenarios below.

#### You contact us

| Information we may gather   | Why we may gather it                 |
|---|--------------------------------------|
| <ul style="list-style-type: none"> <li>• Name</li> <li>• Contact details</li> <li>• Organisation you represent</li> <li>• Your role there</li> <li>• Anything else you choose to tell us</li> </ul> | To enable us to deal with your query |
| How we may gather it  | Lawful reason                        |
| <ul style="list-style-type: none"> <li>• By the method you use to contact us</li> <li>• For example: email, phone, messaging, social media, the contact form on our website</li> </ul>              | Consent                              |
| <b>Data Controllers: Juralio Technology Ltd and Juralio Ltd</b>   |                                      |

#### You are our customer, or use the Juralio software

| Information we may gather   | Why we may gather it  |
|---|---|
| <ul style="list-style-type: none"> <li>• Your name</li> <li>• Your contact details, including your email address</li> <li>• The organisation you represent and your role there</li> </ul>   | <ul style="list-style-type: none"> <li>• To identify you when you sign up to our product</li> <li>• To enable you to log in to and use our product</li> <li>• To update you about our product and company</li> <li>• To verify that you are a customer or user when you contact us</li> <li>• To maintain and develop our relationship with you</li> <li>• To verify usage and billing in the event of a query</li> </ul> |
| How we may gather it  | Lawful reason   |
| <ul style="list-style-type: none"> <li>• Business communications with you and your colleagues in connection with your or your organisation's use of our product</li> <li>• Business communications with you and your colleagues and representatives for the purpose of any matters we are working on with you or them</li> <li>• Creation of a user account for you / your organisation in our product</li> </ul> | <ul style="list-style-type: none"> <li>• We have a legitimate interest to provide you with our product. This includes things such as using your personal information to allow you to sign up and log in, keep in touch where you have bought or are using our product, to keep you informed of how it develops and sharing other information about it likely to be of interest</li> </ul>                                 |

|   |  |
|---|--|
| <ul style="list-style-type: none"> <li>• When you sign in to your account within the product</li> </ul> |  |
| <b>Data Controllers: Juralio Technology Ltd and Juralio Ltd</b>   |  |

### You are our business counterparty (e.g. a supplier)

| Information we may gather  | Why we may gather it  |
|--|---|
| <ul style="list-style-type: none"> <li>• Your name</li> <li>• Your contact details, including your email address</li> <li>• The organisation you represent and your role there</li> </ul>      | <ul style="list-style-type: none"> <li>• To maintain and develop our relationship with you</li> <li>• To contract or otherwise do business with you / the organisation you represent</li> </ul> |
| How we may gather it   | Lawful reason   |
| <ul style="list-style-type: none"> <li>• Business communications with you and your colleagues and representatives for the purpose of any matters we are working on with you or them</li> </ul> | <ul style="list-style-type: none"> <li>• We have a legitimate interest to maintain business relationships with you and the organisation you represent (as applicable).</li> </ul>               |
| <b>Data Controllers: Juralio Technology Ltd and Juralio Ltd</b>  |   |

### Sales and marketing

| Information we may gather  | Why we may gather it  |
|--|---|
| <ul style="list-style-type: none"> <li>• Name</li> <li>• Contact details</li> <li>• Organisation you represent</li> <li>• Your role there</li> <li>• Anything else you choose to tell us</li> </ul>  | <ul style="list-style-type: none"> <li>• Contacting you and staying in touch for sales, marketing and relationship purposes</li> </ul>  |
| How we may gather it   | Lawful reason   |
| <ul style="list-style-type: none"> <li>• Individualised contact, for example in response to inquiries you have made</li> <li>• Mailing lists on topics we think are likely to interest you, such as product updates and company news – but we'll include an option to unsubscribe</li> </ul> | <ul style="list-style-type: none"> <li>• Our legitimate interest in marketing and selling our product and developing or maintaining relationships with people likely to be interested in our product</li> </ul> |
| <b>Data Controllers: Juralio Technology Ltd and Juralio Ltd</b>  |   |

### You apply for a job

| Information we may gather  | Why we may gather it   |
|--|--|
| <ul style="list-style-type: none"> <li>• Name</li> <li>• Contact details</li> <li>• Citizenship and right to work in location(s) relevant to the job</li> <li>• Education and work history</li> <li>• Criminal record (but not "spent" convictions)</li> </ul>   | <ul style="list-style-type: none"> <li>• Assessing the possibility of you working with us</li> <li>• Unless you actually start working for us, we will delete such information after the job application process has been completed, within a time determined by our information retention policy. We'll delete it sooner if you ask us to, and we'll only keep it longer with your specific consent.</li> </ul> |
| How we may gather it   | Lawful reason  |
| <ul style="list-style-type: none"> <li>• We may obtain this from you directly or (with your consent) from a recruiter engaged by you. We may also obtain such information from third party sites (e.g. LinkedIn)</li> <li>• We will only seek references from employers or make a criminal records search with your prior consent</li> </ul> | <ul style="list-style-type: none"> <li>• Consent</li> </ul>  |

|  |  |
|--|--|
| If you choose to give us further personal information then, obviously, we will be collecting that as well. But we're well aware of our legal and ethical obligations as employers not to ask for certain information (e.g. family plans) and don't want to obtain such information |  |
| <b>Data Controller: Juralio Ltd</b>  |  |

## Policies



### We don't use cookies on our website, and don't track people who browse it

We don't use cookies or similar technologies on our website.

For the meaning of "cookies or similar technologies" see the [UK Information Commissioner's Office guidance](#).

Cookies can range from benign to the questionable. We don't use them at all on our website because:

- They aren't necessary to make it work.
- We don't want to track people across sites (a common reason for using cookies) – we think that's inappropriate and we're not comfortable with the "cookie consent" approach of many websites.
- Although it's useful for a business to analyse how our website's being used, we can do that in a way we find good enough without using cookies or tracking people.

If, in future, we need to use cookies (for example, to provide a secure online option to buy a subscription to our product), we'll update our policy and this notice.

### Our product downloads some files to make it work

When you sign in to our product, Juralio, your browser will store some files and information necessary for Juralio to work properly. We don't use this to track you.

If you are a customer or user of our product and would like more technical information about this, please contact us.



### We don't share personal information without consent, legal requirement or legitimate interest

We don't share your personal information with other people unless:

- You **consent** specifically to us doing this.
- We are **legally required** to do so – for example, to comply with a court order.
- We have a **legitimate interest** in doing so.

We may share your personal information on the basis of a legitimate interest in these cases:

1. **We may share it within the Juralio group of companies, that is between Juralio Technology Ltd and Juralio Ltd.** We do this in the legitimate interest of managing the corporate group's business effectively. Both companies follow a consistent approach to privacy.
2. **We may share it for secure storage and processing on cloud software platforms (for example, Google Workspace, Microsoft)** to help us manage documents, correspondence, messages, finance, sales, marketing, business relationships and business contacts. We assess the approach to security and privacy of such platforms before using them, and on an ongoing basis. Storing and processing information on them necessarily involves sharing it with the companies which operate such platforms. We do this in the legitimate interest of managing our business effectively.
3. **We may share it (for example, with an authority or court) to prevent or remedy unlawful activity** such as fraud or attempts to compromise the security of our website, company or product. We do this in the legitimate interest of protecting our business, team, product, customers and users.

4. **We may share it with our professional advisers** who help us, in confidence, with accounting, audit, privacy / data protection, legal, security, compliance and other issues. We do this in the legitimate interest of running our business lawfully and effectively.
5. **Potentially in future we may share it with another organisation with whom we discuss a merger or sale of our business**, if they need to check, in confidence, our business records. If we do this, it will be in the legitimate interest of improving our business.

## **If we obtain personal information via an integration, we use it only for that purpose**

For example, you may give the Juralio software access to your Google Workspace account to allow you to find and preview documents stored there and add links to them within Juralio.

If you do so, we will only use that access to the extent, and for the time, necessary to achieve that purpose.

## **Information security, location and retention**

Juralio Ltd, maintains an information security management system and an ISO 27001 accreditation. Juralio Technology Ltd operates consistently with that system and accreditation.

We store personal information in the UK or EEA where possible but it may be stored, hosted or otherwise transferred to another country.

An exception to this is our usage of a solution called Helpscout, which stores information in the United States. This is used for the purpose of providing a product support component in the Juralio software via which you can contact us for help. For details please see the references to 'end users' in Helpscout's privacy notice at <https://www.helpscout.com/company/legal/privacy/>

If you're a customer or user of our product from a country outside of the UK and/or EEA, any personal information we receive about you or other users' personal information will be transferred from the country you reside to the UK, EEA and any other countries where we may store, host or transfer personal information.

We have an information retention policy which defines how long we keep various categories of personal information. If it's relevant to personal information we store in relation to you, please contact us and we'll be glad to address the relevant points.

## **You have legal rights relating to personal information**

You have various legal rights in relation to personal information that we control.

This is not intended to be a comprehensive statement of the legal position (this may also vary depending upon where you reside), but your rights may include:

- accessing personal information we hold about you
- objecting to our use of your personal information based on the legal ground of 'legitimate interest'
- withdrawing your consent to any processing of your personal data at any time
- rectifying personal information about you that is inaccurate
- complaining to regulators with lawful authority, such as the UK Information Commissioner's Office

If you'd like to exercise any of these rights, please contact us.