

Privacy Policy for Candor

Effective Date: 3 Feb 2024

1. Introduction

Welcome to Candor, a software designed for high-powered teams to enhance culture and employee sentiment without the need for complicated setup. This Privacy Policy outlines how we collect, use, disclose, and protect your personal information and data when you use our website and application. By accessing or using Candor, you consent to the practices described in this Privacy Policy.

1.1 Contact Information

If you have any questions, concerns, or requests regarding this Privacy Policy or your personal data, please contact us at:

Blessing Jonamu
Data Protection Officer
privacy@candorsoftware.com

Please use this contact information for all privacy-related inquiries and requests. We are committed to protecting your privacy and will respond promptly to any concerns you may have.

2. Legal Basis for Processing

In this section, we clarify the legal basis for processing personal data through various tools and platforms used by Candor. The legal bases for processing personal data may include legitimate interests, consent, or contractual necessity, as applicable.

Tool/Platform	Purpose of Processing	Legal Basis for Processing
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<i>Webflow Forms</i>	Capturing interest in our product, inquiries, and opportunities.	Legitimate interests, as it is necessary for our business operations to respond to inquiries and engage with potential users.
<i>LinkedIn Forms</i>	Capturing interest in our product, inquiries, and opportunities.	Legitimate interests, as it is necessary for our business operations to respond to inquiries and engage with potential users.
<i>Segment</i>	Tracking user actions on the platform, such as starting retros or completing check-ins. Data is dispatched to Google Analytics, Mixpanel, and Sentry.	Legitimate interests, as it helps us improve and optimize our platform's functionality and user experience.
<i>Sentry</i>	Tracking and investigating bugs and issues arising from platform usage.	Legitimate interests, as it is essential for maintaining the reliability and security of our platform.
<i>Google Analytics</i>	Analyzing website traffic, including the number of visitors and details about marketing efforts, such as sources and conversion rates.	Legitimate interests, as it helps us understand user behavior, improve our website, and assess the effectiveness of our marketing efforts.
<i>Mixpanel</i>	Analyzing user engagement and platform usage, including the number of retros conducted and popular features.	Legitimate interests, as it assists in enhancing the functionality and usability of our platform.

<i>Firebase</i>	Storing system data and feedback provided by users.	Legitimate interests, as it is necessary for the proper functioning and improvement of our platform.
<i>OpenAI</i>	Sending sentiment scores to GPT for generating actionable insights. No sensitive data is sent to OpenAI.	Legitimate interests, as it aids in improving our platform's features and user experience by providing valuable insights without sharing sensitive information.

Note: *We ensure that data shared with third-party tools and platforms is done in accordance with applicable data protection laws and regulations. The privacy policies of these third-party platforms are incorporated into ours. You can review the respective privacy policies of these platforms for more information about their data handling practices.*

3. International Data Transfers

In the course of providing our services, some data may be transferred outside of the UK or the European Economic Area (EEA) to third-party tools and platforms that are located in regions outside of these areas. These international data transfers are subject to appropriate safeguards to ensure the protection and security of your personal data.

Safeguards in Place:

To safeguard the transfer of data to these third-party tools and platforms, we rely on various mechanisms, including:

Standard Contractual Clauses (SCCs): For tools such as Webflow Forms and LinkedIn Forms, which may involve the collection of personal data from users who visit our website and express interest or ask questions, we have entered into contractual agreements with these third-party providers that include SCCs. These contractual clauses ensure that the data transferred is protected in accordance with EU and UK data protection regulations.

Privacy Shield: While the EU-U.S. Privacy Shield framework is no longer a valid mechanism for data transfers, we have verified that relevant third-party providers, such as Google Analytics

and Mixpanel, have alternative mechanisms and certifications in place to comply with EU and UK data protection requirements.

Data Processing Agreements: In cases where applicable, we have established data processing agreements with third-party providers, including Firebase and GPT API, to ensure that they meet the necessary data protection standards.

By using our services, you consent to the transfer of your personal data outside of the UK and the EEA in accordance with the safeguards mentioned above.

4. Data Subject Rights

As a user of Candor, you have specific rights regarding your personal data. We are committed to ensuring that you can exercise these rights in a transparent and straightforward manner. Your data subject rights include:

4.1 Right to Access:

You have the right to request access to the personal data we hold about you. You can do this by logging into your account and accessing your data directly. If you encounter any difficulties or need assistance, please contact us at privacy@candorsoftware.com, and we will provide the information you require.

4.2 Right to Rectify:

You have the right to correct any inaccuracies or incomplete personal data that we hold about you. Most of your data can be updated or edited directly through the settings menu in your account. For any data that cannot be modified directly, please send a request to privacy@candorsoftware.com, and we will assist you in making the necessary changes.

4.3 Right to Erase:

You can delete your organization or your account at any time through the settings menu. This action will erase your data from our platform. Please note that certain data may be retained for legal or regulatory compliance purposes, as explained in our data retention policy.

4.4 Right to Restrict Processing:

You have the right to request the restriction of processing of your personal data. If you wish to restrict the processing of your data for specific purposes, please contact us at privacy@candorsoftware.com, and we will address your request promptly.

4.5 Questions and Assistance:

If you have any questions about your data subject rights or need assistance in exercising these rights, please don't hesitate to reach out to us at privacy@candorsoftware.com. We are here to help and ensure that your rights are respected.

It's important to understand that while we strive to facilitate the exercise of your rights directly through our platform, we are also ready to assist you in any way necessary to ensure your data is accurate, up-to-date, and processed in accordance with your preferences and applicable data protection laws.

5. Marketing Communications

At Candor, we may occasionally send marketing communications to keep you informed about our latest products, services, and updates. We respect your preferences, and you have the following options regarding marketing messages:

5.1 Opting In:

If you wish to receive marketing communications from us, you can opt in by subscribing to our marketing lists through our website or other communication channels.

5.2 Opting Out:

If you no longer wish to receive marketing communications from us, each marketing email you receive from Candor will include an "Unsubscribe" link. Clicking on this link will allow you to opt out of future marketing emails. Please note that you may be subscribed to multiple lists, but selecting "Unsubscribe" will remove you from all marketing communication lists.

5.3 Your Rights:

We are committed to respecting your rights when it comes to marketing communications. This includes honoring your choice to opt out of receiving marketing messages. If you choose to unsubscribe, we will promptly update our records to ensure you do not receive further marketing communications from us.

5.4 Contact Us:

If you have any questions or encounter any difficulties regarding your marketing preferences, please don't hesitate to contact us at privacy@candorsoftware.com. We will assist you with any inquiries or requests related to marketing communications promptly.

Your preferences matter to us, and we strive to provide you with clear and easy-to-use options for managing your marketing communication preferences.

6. Cookies and Tracking

We use cookies and similar tracking technologies on our website to enhance your browsing experience and gather information about how our website is used. Cookies are small text files that are placed on your device when you visit a website. They help us analyze website traffic and provide personalized content. Here's what you need to know:

6.1 Types of Cookies:

- **Session Cookies:** These are temporary cookies that are deleted from your device when you close your browser. They are used to maintain your session on our website.
- **Persistent Cookies:** These cookies remain on your device for a specified period even after you close your browser. They help us recognize you on your next visit.

6.2 Cookie Purposes:

- **Google Analytics:** We use Google Analytics to collect information about how our website is used. This data helps us analyze user behavior, track the number of visitors, and improve our website's performance.
- **Session Management:** Some cookies are essential for session management, ensuring that you can navigate our website smoothly.
- **Personalization:** Cookies may be used to remember your preferences and provide personalized content.

6.3 Managing Cookies:

You can manage your cookie preferences and opt out of certain cookies through your browser settings. Most web browsers allow you to control cookies by adjusting settings to accept, reject, or delete cookies. Please note that if you disable cookies, some features of our website may not function properly.

6.4 Obtaining Consent:

By using our website, you consent to the use of cookies as described in this Privacy Policy. When required by applicable data protection laws, we will obtain your explicit consent before placing non-essential cookies on your device.

6.5 Third-Party Cookies:

At present, we do not use third-party cookies for contact forms on our website. However, we do use Google Analytics for web analytics. You can find more information about Google Analytics' use of cookies in their respective privacy policies.

For any questions or concerns related to cookies or your privacy preferences, please contact us at privacy@candorsoftware.com.

7. Data Retention

At Candor, we understand the critical role that data plays in the functionality of our platform. We have implemented a data retention policy that balances our operational needs with respect for your privacy. This policy is designed to ensure the secure storage of personal data and its retention for only as long as necessary for the purposes for which it was collected.

7.1 Data Retention Criteria:

The retention of personal data is determined based on the following criteria:

- **Business Necessity:** We retain data that is essential for the core functionality of our platform, including user accounts, organization information, and feedback data.
- **Legal and Regulatory Requirements:** We retain data to comply with applicable legal and regulatory obligations, including tax, accounting, and auditing requirements.
- **Security and Integrity:** We retain data to maintain the security and integrity of our platform and to investigate and prevent fraud or security incidents.

7.2 Data Retention Period:

The maximum retention period for personal data on our platform is typically 7 years, in accordance with UK data protection laws. This duration may vary depending on the nature of the data and the purposes for which it is processed.

7.3 Secure Data Deletion:

When personal data is no longer needed for its intended purposes or when the maximum retention period has expired, we ensure its secure deletion from our systems. This process includes permanently erasing data to prevent unauthorized access or use.

7.4 Exceptions:

In some cases, we may retain certain data beyond the standard retention period if required by law or if there are legitimate business needs to do so. However, such data will continue to be protected in accordance with this Privacy Policy.

We are committed to safeguarding your personal data and ensuring that it is retained and deleted in compliance with UK data protection laws. If you have any questions or requests related to data retention, please contact us at privacy@candorsoftware.com.

8. Complaints and Supervisory Authority

We value your privacy and are committed to addressing any concerns or complaints regarding the handling of your personal data. If you believe that your privacy rights have been infringed or that we have not complied with applicable data protection laws, you have the right to lodge a complaint with the Information Commissioner's Office (ICO), which serves as the UK's data protection supervisory authority.

8.1 Lodging a Complaint with ICO:

To file a complaint with the ICO, you can visit their official website and follow their guidance on how to initiate the complaint process. The ICO is responsible for ensuring that organizations, including Candor, adhere to data protection laws and regulations.

8.2 Contacting Us:

We encourage you to reach out to us first if you have any concerns or complaints regarding the handling of your personal data. We are dedicated to resolving any issues promptly and efficiently. Please contact us at privacy@candorsoftware.com with your questions or concerns, and we will make every effort to address them to your satisfaction.

Your privacy matters to us, and we are committed to providing you with clear avenues for addressing any privacy-related concerns or complaints.

9. Changes in Data Protection Laws

At Candor, we are committed to maintaining compliance with UK data protection laws and regulations. We recognize that data protection laws may evolve over time, and we will adapt our practices accordingly to ensure continued compliance.

9.1 Notification of Significant Changes:

In the event of significant changes to our privacy practices or any updates to UK data protection laws that may impact the processing of personal data, we will make reasonable efforts to notify our users. Notifications of significant changes will be provided through means that we consider appropriate, including email communication or prominent notices on our website.

9.2 Continuing Your Use of Our Services:

By continuing to use our services after being notified of significant changes to our privacy practices or data protection laws, you indicate your acceptance of those changes. We encourage you to review our Privacy Policy periodically to stay informed about how we collect, use, and protect your personal data.

Our commitment to data protection and your privacy remains unwavering, and we will always strive to keep you informed of any important developments.

10. Cross-Border Data Transfers

In the operation of our services, certain data may be transferred to countries outside the UK or the European Economic Area (EEA) when utilizing third-party tools and platforms. To safeguard the protection of your personal data during these cross-border transfers, we have implemented appropriate mechanisms and measures.

10.1 Data Protection Mechanisms:

We utilize various mechanisms and safeguards to ensure the protection of data transferred to countries outside the UK or the EEA:

- Standard Contractual Clauses (SCCs): We have entered into contractual agreements with some of our third-party providers, including Webflow Forms and LinkedIn Forms, which include SCCs. These clauses are designed to ensure that personal data is adequately protected during international transfers.
- Privacy Shield and Equivalent Frameworks: While the EU-U.S. Privacy Shield is no longer a valid mechanism, we ensure that relevant third-party providers, such as Google Analytics and Mixpanel, maintain compliance with equivalent frameworks when applicable, ensuring that data protection requirements are met.
- Data Processing Agreements: We establish data processing agreements with our third-party providers, including Sentry and Firebase, to ensure that they uphold the necessary data protection standards.
- Data Minimization: When using the GPT API, we take measures to minimize the transfer of personal data by ensuring that no sensitive information is shared with OpenAI. Sentiment scores are sent to GPT to generate actionable insights without revealing sensitive data.

10.2 Third-Party Privacy Policies:

We are committed to ensuring that third-party providers comply with data protection regulations. You can review the respective privacy policies of these providers for more specific details about their data handling practices during cross-border transfers:

- Webflow Forms: Review Webflow's privacy policy for information on how they handle data transfers.
- LinkedIn Forms: Refer to LinkedIn's privacy policy for insights into their data transfer practices.
- Segment: Segment collects data and dispatches it to Google Analytics, Mixpanel, and Sentry. You can explore Segment's privacy practices in their policy.
- Sentry: Sentry is used to track and investigate bugs. Review Sentry's privacy policy for details on cross-border data transfers.
- Google Analytics: Google Analytics is used for website traffic analysis. Consult Google's privacy policy for information on data transfer practices.
- Mixpanel: Mixpanel is used for user engagement and platform usage analysis. Explore Mixpanel's privacy policy for insights into data transfers.
- Firebase: Firebase is utilized for storing system data and feedback. Refer to Firebase's privacy policy for details on cross-border transfers.

- GPT API: When using the GPT API, we ensure that no sensitive data is sent to OpenAI. You can learn more about OpenAI's data handling practices in their privacy policy.

By using our services, you acknowledge and consent to the cross-border transfer of your personal data in accordance with the mechanisms and safeguards mentioned above.