

# Services Privacy Notice for AccessReal Services

## Introduction

Your privacy is very important to us. This Services Privacy Notice (the "**Notice**") explains the privacy practices that i-Sprint employs when its customers and their end-users use our AccessReal Services ("**Services**").

When we talk about "**i-Sprint**," "**we**," "**our**," or "**us**," in this notice, we are referring to i-Sprint Innovations Pte Ltd and its group companies. When we say "**you**" or "**End-User**" in this notice, we mean any individual using and accessing our Services. When we talk about an "**Organization**", "**Company**" or "**Customer**" in this Notice, we are generally referring to the entity of which you are an employee, contractor, member, or other participant, that has engaged us to provide the services under the terms of a contract. The "Company Administrators" we talk about in this notice are the individuals authorized by our Customers to help administer our services internally.

By sharing your personal information with us, and by continuing to use our Services, you confirm that you have read and understood the terms of this Notice.

For personal information that we collect:

- through our websites (such as <https://www.accessreal.com>) or product feedback and surveys, and in connection with our events, sales and marketing activities.

If you have any questions, comments or concerns about any aspect of this Notice or how we handle your information, please reach out to our team using the details provided under the "**Contact Us**" section of this Notice.

## Our Privacy Principles

Trust and transparency are foundational to what we do at i-Sprint. We are committed to being open about how we approach privacy at i-

Sprint, and aim to communicate with you about privacy in a way that is easy for you to understand. To support these goals, we developed these Privacy Principles to highlight our commitment to responsibly protecting and handling your personal information. Our Privacy Principles help guide decisions we make at every level of our organization, every day, so that we can fulfill our mission to democratize security in a way that is consistent with our core values as well as our legal obligations.

Our core Privacy Principles are:

1. We respect individuals' privacy by promoting informed choice.
2. We collect only the personal information we need, and "pseudonymize" or get rid of what we don't.
3. We are transparent about how we use personal information and accountable for how we and our partners use it.
4. We factor security into everything we do.
5. We engineer privacy by design into our ideas and products.

## **Notice to End Users**

In general, our Services are intended for use by Organizations, administered to you by your Organization, and subject to your Organization's policies, if any, or instructions. This means that we are collecting and processing your personal information on behalf of your Organization. In these cases, we are generally acting as a processor of your personal information, processing the information according to your Organization's instructions, because your Organization is the controller. It is primarily your Organization, as the controller, that controls what personal information about you we collect and how we use it. If you have privacy related questions or concerns about your Organization's privacy practices or the choices your Organization has made to share your information with us or any other third party, you should reach out to your Organization's Administrator or see your Organization's privacy policies. i-Sprint is not responsible for the privacy or security practices of our Customers, which may differ from those set forth in this Notice.

## Who we are

i-Sprint provides security solutions, including multi-factor authentication, trusted access and secure single sign-on tools for our customers. [Find out more here.](#)

i-Sprint Innovations Pte Ltd is a company incorporated under the laws of the Republic of Singapore and whose principal office is located at 750D Chai Chee Road, #08-01 Viva Business Park, Singapore 469004.

## What personal information we collect and how

We know that personal information is defined slightly differently across the world. That said, at i-Sprint's AccessReal Services, we define it as any information that could be used to identify you or another individual. We think that this broad definition enables us to better respect your privacy and safeguard the information entrusted to us.

The personal information that we collect about you broadly falls into three categories - information that is provided to us, information we collect automatically, and information we process on behalf of your Organization.

**Information that is provided to us:** Your Organization's Administrator or you may provide personal information to us through the Services. This may be done, for example, when you are signed up for and use the Services, when you consult with our customer success team or you send us an email or communicate with us in any way. We will generally let your Organization's Administrator or you know prior to collecting your personal information whether the information we are collecting may be provided on a voluntary basis and the consequences, if any, of not providing it.

*End-Users:* When setting up an account for our Services, your Organization's Administrator (or you, if you use i-Sprint Free) will be asked to provide certain basic information about you including, without limitation, the following:

- name
- email address
- telephone number

Since the scope and nature of the Services provided depends on different Customers and their requirements, for your specific information collected and processed by us, please refer to your [Account Information].

We also collect your Organization's name and assign you a related account name.

If you ever communicate directly with us, we will maintain a record of those communications and responses.

*Organization Administrators:* We generally ask for more information about Organization Administrators in order to provide the Services and help manage the Organization's Account. We ask Organization Administrators to provide the following information about themselves:

- name
- email address
- billing and delivery address
- telephone number
- job title
- Organization name
- information about other Organization Administrators working on related projects
- legal representative

Since the scope and nature of the Services provided depends on different Customers and their requirements, for your specific information collected and processed by us, please refer to your [Account Information].

**Information we collect automatically:** When you use the Services, we automatically collect certain information about your device and how you interact with our Services, by for example, using technologies like cookies. We do this to help us provide the Services, and to ensure that we are providing our customers and you the best experiences with our Services. From time to time, we may need to associate the data we automatically collect with other personal information we have collected about you to confirm you as an End User and to check the security of your device.

The information we automatically collect through the Services includes:

**Device information**, such as: device attributes (for example: hardware model; operating system; web browser version; as well as unique device identifiers and characteristics, including if your device is “jailbroken,” if you have a screen lock in place and if your device has full disk encryption enabled), connection information (for example, name of your mobile operator or Internet Service Provider, browser type, language and time zone, and mobile phone number); device locations (for example, internet protocol (IP) addresses and Wi-Fi); and for some Services, whether a Public Key Infrastructure Certificate is installed on your device.

Since the scope and nature of the Services provided depends on different Customers and their requirements, for your specific information collected and processed by us, please refer to your [Account Information].

**Log data**, this includes information that your browser sends whenever you visit a website, included one of ours, or that your AccessReal mobile app sends whenever you are using it. This log data may include how you access the Services (including the device-specific information

discussed above and type of integration - in other words, the application - being protected), the dates and times you access the Services, where you access the Services from (by IP address) and device event information such as crashes, system activity, and hardware settings.

**Services usage information**, such as administrative and support communications with us and information about the features, content, and links you interact with, and what third party integrations you use, if any.

**Information we process on behalf of your Organization**: When your Organization or your Organization Administrator upload, input or generate personal information in the Services about you (their End Users), we will typically act as a processor and process such personal information on behalf of your Organization and our privacy practices will be governed by the contract we have in place with your Organization. This Notice will not apply to such personal information.

## **How we use the information we collect**

In general, we use the personal information we collect to operate our business and provide our Services, which includes using data to improve, research and develop our product offerings and to personalize your experiences.

We may use the personal information we collect through the Services for a range of reasons, including:

- to provide and maintain the Services.
- to manage your Organization's or your account with us, including for billing purposes as well as for our customer relationship management.
- to personalize the Services and improve your experience.
- to improve our products, technology and Services, and, where you have agreed, to provide you updates on how we are

improving the Services based on any feedback you might have given.

- to analyze your use of the Services in order to ensure the technical functionality of our products, technology and Services, and to research and develop new products and services.
- to conduct aggregate statistical analysis with "Performance Data." Performance Data includes aggregate, de-identified usage information and other aggregate measures of the Services' performance. We may share aggregated, de-identified Performance Data with third parties to help us better understand our customers' needs and improve the Services.
- to prevent, detect, respond and protect against potential or actual claims, liabilities, prohibited behaviour, and criminal activity.
- to comply with and enforce applicable legal requirements, agreements and policies.
- to perform other activities consistent with this Notice.

## **Who we share your personal information with**

We may share the personal information described in this Notice with others. We generally do this where it is necessary to complete a transaction, to provide our Services to your Organization or you, where your Organization or you have requested or authorized us to do so, with your consent (where applicable), or as otherwise permitted or required by applicable law.

The trusted third parties with whom we share your personal information include:

- **Our group companies.** We share information with entities that we control, are controlled by us, or are under our common control, to provide our Services. i-Sprint Innovation Pte Ltd is the party responsible for overall management and use of personal information by these affiliated parties.

- **Our third party service providers and partners.** We share information with service providers and partners who help us provide the Services. These service providers help us with things like cloud hosting, telephony, mobile push, and, where applicable, managed public key infrastructure services. A list of our current service providers and partners is available [here](#).
- **Our Customers and their authorized third parties.** At your Organization's direction, we share information with the Organization and any parties directly authorized by the Organization. We are not responsible for your Organization or its authorized third parties' privacy practices. Our Notice does not apply to and we are not responsible for use of your personal information by these other companies.
- **A competent law enforcement body, regulatory, government agency, court or other third party.** We will share personal information where we have a good faith belief that doing so is necessary (i) to comply with applicable law, (ii) to enforce our terms and conditions; (iii) to protect our rights, privacy, safety or property, and/or those of our affiliates, You or others; and (iv) to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include authorities outside your country of residence.
- **Other third parties.** We will share information with third parties in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings), in which case we will inform the acquiring or resulting company that it must use your personal information only for the purposes disclosed in this Notice.

## Cookies and similar technologies

When you use our Services, we use cookies and other similar tracking technologies like "web beacons" (collectively "**Cookies**") to collect and use personal information about you, including to allow us to remember

your user preferences, maximize the performance of our Services, and enhance and personalize your experience. For further information about the types of Cookies we use, why, and how you can control Cookies, please see our Cookie Notice.

## **How we keep your personal information secure**

Security is what we do, and we take the security of the personal information we have about you very seriously. We use appropriate administrative, organizational, technical and physical safeguards that are designed to protect the personal information we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information and to help ensure that your data is safe, secure, and only available to you and to those with authorized access (as decided by your Organization Administrator or you, as appropriate). However, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so you should take care in deciding what information you send us in this way.

Nevertheless, certain information of yours collected by us will be encrypted to ensure a certain level of data security. What and how information will be encrypted depends on different Customers and their requirements. Please refer to your [Account Information]

## **International data transfers**

We are headquartered in the Singapore and operate internationally. Therefore, you should be aware that we may transfer or process your personal information in countries other than the country in which you are a resident. These countries may have data protection laws that are different than the laws of your country, and in some cases may not be as protective.

Specifically, our Website servers are located in the Singapore, and our group companies and third party service providers, including Amazon Web Services (“AWS”) and partners, operate in the Singapore and in other countries around the world. This means that when we collect your personal information we may process it in any number of places around the world.

Wherever your personal information is transferred, stored or processed by us, we will take reasonable steps to safeguard the privacy of your personal information as indicated in this Notice. Additionally, when using or disclosing personal information transferred from the European Economic Area, we use standard contractual clauses approved by the European Commission, adopt other means under applicable law for ensuring adequate safeguards, or obtain your consent.

If you would like a copy of our standard contractual clauses or more information on the appropriate safeguards we have implemented with our third party service providers and partners, please reach out to us using the details provided under the “[Contact Us](#)” section of this Notice.

## **How long we keep your personal information**

We only keep your personal information for as long as we have an ongoing legitimate business need to do so (for example, to fulfill the purposes outlined in this Notice, to provide the Services or to comply with legal, tax or accounting requirements, to enforce our agreements or to comply with our legal obligations).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it. If this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **Legal basis for processing (European Economic Area users only)**

If you are a user from the European Economic Area, where we are collecting your personal information as a controller, our legal basis for doing so will depend on the personal information concerned and the specific context in which we collect it. However, as it relates to our Services, we will normally collect personal information from you only where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms, or where we need the personal information to perform a contract with you if you have signed up for the Services on your own behalf. In some cases, we may also have a legal obligation to collect personal information from you.

If we ask you to provide personal Information to comply with a legal requirement or to enter into a contract, we will make this clear at the relevant time and let you know if the personal information is mandatory or not (as well the possible consequences if you do not provide it). Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party) that are not referred to in this Notice, we will make it clear to you at the relevant time what those legitimate interests are. Typically, our legitimate interests include improving, maintaining, developing and enhancing our technology, products, services, ensuring the security of the Services and for our marketing purposes.

If you have questions or need further information about the legal basis we rely on to collect and use your personal information, please reach out to us using the details provided under the "[Contact Us](#)" section of this Notice.

## **Your rights, controls and choices**

As we noted in in the "Notice to end users" section of this Notice, for much of the personal information we collect and process through the Services, i-Sprint Security acts as a processor for its Customers, the

Organization. If you would like to exercise data protection rights for this personal information – including your rights to access, correct, or delete such data – you should contact your Organization directly and it will deal with your request. Where required, we may provide assistance to the Organization.

However, in those cases where we are the controller, we provide ways for you to exercise certain rights, controls and choices.

Where we are a controller of your personal information, you have the following rights, controls and choices:

- You can **access, review, change, update or delete** your personal information at any time. Please note that we may impose a small fee for access and disclosure of your personal information where permitted under applicable law, which will be communicated to you. We do not charge you to update or remove your personal information.
- If you are resident in the European Economic Area, you can **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information.
- If we have collected and process your Personal Information with your consent, then you can **withdraw your consent** at any time. Please note, though, that withdrawing your consent will not impact the lawfulness of any processing we conducted before you withdrew your consent, nor will it impact the processing of your personal information we conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a data protection authority** about our collection and use of your personal information. Contact details for data protection authorities in the European Economic Area, Switzerland and certain non-European countries (including the US and Canada) are available here.)

In addition, many of our products and features contain settings that allow Organizations or Organization Administrators or End Users to control how information is collected. Please see the relevant product documentation or contact us through the appropriate technical support channel for assistance.

If you would like to exercise any of your rights relating to your personal information, please start by contacting us using the contact details provided under the "[Contact Us](#)" section of this Notice.

We respond to all requests we receive from individuals wishing to exercise their data protection rights under applicable data protection laws. To protect your privacy and security, we take reasonable steps to verify your identity before granting you account access or making corrections to your personal information.

## **Children's information**

The Services are not intended for nor directed to individuals that are deemed to be children under applicable data protection or privacy laws, and we do not knowingly collect or store any personal information from such individuals.

## **Changes to this Privacy Notice**

From time to time, we may change this Privacy Notice in response to changing technologies, industry practices, and regulatory requirements or for other purposes. We will provide notice to you if these changes are material (this notice may be by email to your Organization's Administrator or you at the last email provided us, by posting notice of such changes on the Website, or by other means, consistent with applicable law) and, if required by applicable law, we will obtain your consent.

You can see when this Notice was last updated by checking the "last updated" date displayed at the top of this Notice.

## Contact Us

We encourage you to contact us if you have any comments or questions about this Privacy Notice or our related privacy practices. You may reach us at [privacy@i-sprint.com](mailto:privacy@i-sprint.com) or at our mailing address below:

ATTN: Privacy Committee  
i-Sprint Innovations Pte Ltd.  
750D Chai Chee Road  
#08-01 Viva Business Park  
Singapore 469004