



AITHIN™ SOFTWARE GDPR PRIVACY POLICY

ABOUT THE GENERAL DATA PROTECTION REGULATION

The General Data Protection Regulation (GDPR) is a regulation in EU law that aims to give residents of the EU more control over their data. Under this regulation, organizations that handle data of EU residents will have to comply with data and privacy rules.

One of the key aims of the GDPR is that you should be informed of how businesses collect, use, share, secure and process your personal data, and you should have control over how your data is used.

This policy is written to explain how we comply with GDPR requirements on personal data privacy and security, and it applies to all instances and users of our web hosted Aithin™ software no matter where they are located.

ABOUT AITHIN™ SOFTWARE

Aithin™ Knowledge Mapping and KM Diagnostics software is developed and maintained by Straits Knowledge Digital Pte Ltd, a company headquartered in Singapore.

Aithin™ is a web-based application which we host on secure ISO/IEC 27001:2013 / SSAE16 SOC-1 Type II compliant data centres. Articles 24, 42 and 43 of the GDPR encourage the use of approved certifications such as these to indicate compliance with GDPR.

Each client has an individual instance of Aithin™ software with no communication or data transfer between instances.

Data captured into Aithin™ is encrypted in transit (while being transmitted between a user's machine and the server) and at rest (while being stored on the server).

Access to any Aithin™ instance is strictly controlled with individual user accounts and user roles that control the information they can see.

Aithin™ collects cookies in order to fulfill its normal operations, such as keeping track of activities in the system and presenting you with the data you need to perform your tasks. These cookies do not personally identify you, they do not track your



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behaviour, and are not used except to perform those specific functional operations for which they were designed. We do not analyse or otherwise exploit these cookies.

Aithin™ instances which are going to be mostly or wholly used within the European Economic Area will be hosted on servers within the European Economic Area.

For organizations with a substantial number of users outside the European Economic Area we will select a ISO/IEC 27001:2013 / SSAE16 SOC-1 Type II compliant data centre that provides the fastest and most secure access for the majority of users.

You should be aware that if it is outside the European Economic Area, the country where we host your Aithin™ instance, or from which we review Aithin™ data via a web interface for the purposes of a contract with your employer, may not have the same level of data protection regulation as provided under the GDPR. However our collection, storage and use of your personal data will continue to be governed by this privacy policy.

You can request to be informed of the location of the data centre hosting your Aithin™ instance by emailing us at gdpr@straitsknowledge.com.

At the expiry of an Aithin™ license period, all data within a specific Aithin™ instance will be completely erased following a normal backup time period under the data centre's normal backup procedures. Prior to that, your employer may export data from Aithin™ including your personal data, which will then be dealt with under their own data protection policy.

ABOUT YOUR PERSONAL INFORMATION

The only personal information that is captured in an Aithin™ instance is your name and your work email. This is normally created for you when your individual user account is set up by a system administrator for Aithin™ on the basis of an instruction from your employer.

This information is only used for the purpose of recording which person created or edited a data entry within Aithin™ so that you can be contacted for any necessary clarifications afterwards. It is not used for any other purpose. It is not transmitted or transferred to any other systems. It is not shared with any third parties.

Your information is kept secure through the measures listed above in the "About Aithin™ Software" section.



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You can review the personal information captured about you by logging into the system, clicking on the Interactive Views tab at the left side, and selecting the option for “User List”.

When you access the User List you will also be able to see the names and emails of your colleagues and their activity, and they will be able to see yours. This is because the knowledge maps in Aithin™ are created collaboratively, and so that you can resolve issues in the maps directly with colleagues when needed. Similar to any internal contact list, your use of the data in the User List is subject to your employer’s Data Privacy Policy, and if you wish to extract or use data from this list other than for the express purposes of a knowledge mapping or KM diagnostics exercise, you should check with your employer on what you are permitted and not permitted to do.

You can request to have your name and email address exchanged for an alias of your choice at any time. You can do so by contacting the Knowledge Manager in your employing organization who engaged with you to participate in a knowledge mapping or KM diagnostics exercise.

LEGAL BASES FOR COLLECTING YOUR PERSONAL INFORMATION

The GDPR requires us to explain the legal bases under which we collect and process your information. They are as follows:

- Processing is necessary for performance of a contract between two parties
- You have given consent to the collection and processing

Your information is provided to us by your employer in the course of a contract with them, and in order to perform the obligations of that contract. Part of our obligation is to validate information entered into the system, and we may need to contact the creators of data entries in order to do that. On that basis we create a personal account for you in the system. You are informed of this when we provide you with your personal login details.

You are deemed to have given your consent by logging into the system using the personal login information we provide you, and by creating or editing data entries within the system under that user account.



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You can withdraw your consent at any time by asking us or your employer to replace your personal name and email with an alias that does not identify you to other users of the system.

If you choose not to take part in the data entry exercise, and no data has yet been created under that account, and if you would like us to remove your name and account completely, you may request that removal and we will comply.

If you have any questions about this policy, you can contact us directly at gdpr@straitsknowledge.com.