



## General Data Protection Regulation (GDPR)

At bulb we are committed to the core philosophies of GDPR, upholding information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

There are seven key principles that are at the core of GDPR and we address these principles in our Privacy Policy. (<https://www.bulbapp.com/u/bulb-inc-privacy-policy>) For your convenience we have listed the seven principles drawn from our privacy policy text which speaks to the principles specifically.

- 1) *Processed lawfully, fairly and in a transparent manner in relation to individuals ('lawfulness, fairness and transparency');*

### **Our Lawful Basis for Processing Data**

If you are a person in the European Economic Area (EEA), we collect and process information only where we have a legal basis to do so.

Consent: We only use information under your consent to provide you with access to the Service, to provide functionality to perform tasks, to provide customer support, and to process account and payment information.

Under Contract: If your organization has entered into a contract with bulb to provide you with the Service, we will use the information that they provide for the same functions listed above. This may include a pre-contractual agreement to provide demo or test accounts.

Legal Obligation: If we need to process your information to satisfy legal requests.

If you have given your consent for us to process your data, you can change your mind at any time by contacting us at [privacy@bulbapp.com](mailto:privacy@bulbapp.com). If your organization (for example, your school) provided a legitimate interest for us to process your data, you have the right to object to that use, however that may mean you will lose access to the Service.



### **Fairness**

Written in clear and simple language so it can be easily understood

### **Transparency**

All our processes regarding GDPR are available upon request via [privacy@bulbapp.com](mailto:privacy@bulbapp.com).

- 2) *Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes ('purpose limitation');*

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

#### To provide bulb Services to you:

We use the information you provide to authenticate you, to personalize your bulb account, to provide customer support and to process operations for you. We provide you access to bulb features and functionality based on your account status, and provide appropriate interactions with other bulb users based on your preferences or administrator settings.

#### For Analytics and Usage purposes:

We gather certain information to use to understand how account holders interact with the Service. In some cases, we make decisions about new features or improvements to make to bulb based on usage patterns of account holders.

#### For communication:

We use the contact information we gather from you or from linked services to process customer support requests, account-related information, or to communicate about changes and updates to the Service. For example we send out email notifications to you regarding account renewals and payments processed. Depending on your settings, you may receive notifications in app or via email for activities that occur in your account.



For customer support:

We use information you provide to help resolve your support requests, analyze data logs, and to improve your interaction with the Service.

For safety and security:

We use your information to verify your account, detect any areas of suspected fraudulent activity or examine violations of our policies.

For protecting our legitimate business interests and rights:

Where required by law, or as necessary to protect our rights and the rights of others, we may use information about you in connection with legal directives, compliance issues, audits or requests by law enforcement.

For promotional purposes:

With your consent, we may include information about you in testimonials, features and promotions of the Service.

- 3) *Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');*

Account and Profile Information:

Bulb asks for and collects information necessary to perform the functions of the application. We collect username, email address and password for authentication and customer care purposes, and we collect name and address for payment purposes. You also have the option of uploading a photo and writing a description for your profile.

Content you provide:

You have the ability to post content to your bulb profile including any personal information you choose to share. You have the ability to set your privacy settings for any and all content you upload, including images, audio, video, documents and links.



#### Information provided to support:

bulb provides a ticketing system through Zendesk to provide customer support. Your email address may be collected. You may also provide details about your support issue and may be asked by our personnel to provide contact information to resolve your concern.

#### Payment information:

We collect payment information to provide our higher level of account access including Name, address and credit card information. The payment information is collected through our secure payment processing service (Stripe) which is PCI, and GDPR compliant.

#### **Information we automatically collect**

##### Device Information:

We collect information about your device and internet connection including device type, screen size, browser and operating system. We collect these through our analytics service in aggregate to evaluate how our service is being used. We also collect general location information through your IP address to approximate your location to provide services.

##### Cookies and tracking software:

Our public website (before login) may collect information to promote bulb to teachers and administrators. Cookies are used for login and session data. We do not use trackers other than basic site analytics in our app to assess usage and performance of the website. We may also collect general location information for geographical purposes, but we don't track in a way that would allow us to identify a street address.

#### **Information we receive from other sources**

##### Third party services linked to your account:

We receive information from third party sources that you or your administrator make available to us. For example, if you are using Google or Microsoft to sign in to your account, we are provided basic info like your name and email address as permitted by your Google or Microsoft account settings.



*4) Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');*

You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed. We will retain personal information that we store and process on behalf of our subscribers for as long as needed to provide the Services to our subscribers. We will retain and use this personal information as necessary as long as you are a subscriber, to comply with our legal obligations, resolve disputes, and enforce our agreements.

*5) Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals ('storage limitation');*

How long we keep data:

We will keep your personal information for as long as is needed to fulfill the purposes of providing our Services under this Privacy Policy, unless a longer retention period is required or permitted by law. When we have no further legitimate need to process your personal information, we will either delete or anonymize it, or, 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. If your account is managed under an organization agreement, we will keep your information as long as is required by your administrator.



*6) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality')."*

Storage and security:

Bulb is constructed to keep your data secure. We take every measure possible to ensure that your data is secure at all points of transfer and storage in our system. We use data hosting systems based in the U.S. to store data. Any transfers of data from outside the U.S. are handled according to our Services' usage of data storage providers. Although it is impossible to ensure 100% security of data due to the complexity of the internet, we employ the best safeguards available to us to prevent compromise. In the very unlikely event that data is compromised, we will respond to the appropriate authorities in a timely way to inform you and resolve any associated issues.

*7) Article 5(2) adds that: "The controller shall be responsible for, and be able to demonstrate compliance with, paragraph 1 ('accountability')."*

Let us know any questions you might have regarding our processes; we are open for discovery – we'll share all our processes – data mining and selling is not any place on our radar. Please reach out to us at [privacy@bulbapp.com](mailto:privacy@bulbapp.com) if you would like to review any of our GDPR processes.