

## **SUPPLEMENTARY PRIVACY NOTICE FOR USERS OF THE ANTSEER VIRTUAL VISION PLATFORM**

We recognise that security, compliance and privacy have never been more important.

This statement explains Antser's practices when we process your "personal data," which is information that relates to an identified or identifiable individual. To "process" or "processing" means any use of personal data including, transferring, collecting, recording, storing, using, analysing, combining, disclosing or deleting it.

When you use Antser's Services through Antser Virtual Vision, the processing of personal data is determined and administered by the Customer under their privacy policies. If you have questions about how and why your personal data is collected, the legal basis for processing, or requests regarding your personal data, please refer to our Customers privacy statement and direct your enquiries to the professional or their administrator.

For example:

Emails and names and addresses of professionals and participants are accessible only to the Customer and the professionals holding AVV accounts.

We do collect data on the usage of the AVV – which films are watched and for how long, when and for how long meetings are held to inform our evaluation.

Any data collected by recordings, in meetings, is held and sent securely to the organising professional, then permanently deleted after 14 days.

### **Who does this notice apply to?**

When you create a user account on the Antser Virtual Vision platform, set up a meeting on it and invite others to participate, or if you join a meeting as a participant, you are a user and "**data subject**" of the Antser Virtual Vision platform, and this notice applies to you.

The person who sets up the meeting is (or acts for) your "controller", and your controller is required to provide you with this notice. The person who sets up the meeting is able to download the information that the Antser Virtual Vision platform acquires about you and meetings you participate in.

**Antser Holdings Ltd** (Cornerstone Training & Support Ltd is now proudly part of the Antser Group), a private company limited by shares, incorporated and registered in England and Wales with company number 11630120 whose registered office is at Vicarage Court, 4 Vicarage Road, Edgbaston, Birmingham, B15 3ES, provides Antser Virtual Vision platform for your controller and will also provide this notice for you as part of the Antser Virtual Vision platform. Antser is not your controller and is not required to provide this

notice to you but wants to make sure that users of the platform are informed, and to make it easier for controllers to inform their users.

## **What is the purpose of this document?**

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**This privacy notice describes the use by Antser Virtual Vision Platform ("AVV") of information about users of the platform, in accordance with the General Data Protection Regulation ("GDPR") and the Data Protection Act 2018 ("DPA") (together "data protection law").**

This Privacy Notice also contains information about when your information will be shared with third parties (for example, service providers, including the provider of AVV, and its own service providers).

In this privacy notice, your information is called "**personal data**". This notice collectively refers to processing, collecting, protecting, transferring, using and storing your personal data as "**processing**" such personal data (but "**use**" of your personal data is synonymous with processing). A "**controller**" is an organisation or other legal person who decides how your personal data will be used for their purposes and, in particular, the person who decides to use (or invite you to use) AVV.

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The purpose of this document is to inform users of AVV about how their personal data will be acquired and used by AVV when they have a user account or participate in meetings using AVV. Your controller is required under data protection law to provide you with the information contained in this privacy notice. If your controller provides you with its own privacy notice containing as much detail as (or more detail than) Antser's, you should give your attention to the notice from your controller. Use Antser's notice if your controller provides no privacy notice, or limited detail.

Antser may update this notice at any time. The version of the privacy notice that is provided by Antser as part of the AVV is the latest version of Antser's version of their standard privacy notice. Your controller will inform you about how they will update you about changes to their privacy notice about AVV.

## **What kind of information does AVV collect?**

Personal data is any information about an individual from which that person can be identified. It does not include information where the identity has been irreversibly removed (a process called "**anonymising**"). Personal data may also have the identity of data subjects temporarily removed (a process called "**pseudonymising**").

There are certain types of personal data ("**Sensitive Data**") whose use is restricted by data protection law, including (in particular, as relevant to the AVV) information about a person's race, ethnicity, health or sexual orientation. Information about criminal offences or convictions is also subject to restrictions on use.

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Depending on which service you use on the AVV Platform, the AVV will process the following personal data about you:

- Information you (and others) give us Antser has set AVV up to automatically collect information from and about you when using AVV:
  - a) Identity Data & Contact Data: When you register to use service(s) on the AVV, Antser ask for user information: your name, email address and phone number. Not all users will be required to provide their email address and telephone number. profile. This information will be held in AVV but will be controlled by your controller. Antser will only use this information if instructed to do so by your controller.
  - b) Transaction Data & Profile Data: Details about payments to and from you concerning products and services you have purchased from us, and details of the items purchased or ordered. This information will be held by us outside the AVV but will be controlled by your controller. Antser only processes payments on behalf of your controller, as part of providing AVV for your controller or for its use.
  - c) Profile Data: Your AVV username and password, your interests, preferences, feedback and survey responses. Your password will be encrypted and will not be able to be accessed by Antser. The information will be held in AVV but will be controlled by your controller. Antser will only contact you, in accordance with your stated preferences, if it is instructed to do so by your controller (for example, automated messages from AVV such as confirming your meeting bookings or appointments, standard and non-personal messages sent to all users about updates to AVV, or standard feedback requests (given to all users) for anonymised feedback which you may decline to give). Information included in your profile about your interests will be visible to other AVV users, who you meet with using AVV, or if you post messages, share or communicate by other means using AVV.
  - d) Meeting Data: AVV collects information about the users, content of meetings and experiences that you connect to within meetings, and how you interact with them within AVV. This includes a recording of what you say in meetings (where consent has been provided); information about where you look in the virtual meeting room; what you write on interactive whiteboards in the virtual meeting room. AVV will collect data from the VR headset that you use so that you can interact with the virtual meeting environment that you see around you. The information will be held in AVV but will be controlled by your controller. Antser will only collect, store and make the information available for your controller to download, for the controller's purposes.
  - e) Posts and Usage Data: When you post, share or communicate with AVV users on AVV, or interact with features (including features provided by Antser's third-party partners), AVV stores those communications and interactions and information associated with them. AVV collects usage metrics about the date on which a post, share or communication was created, the content that you post (including pictures and any avatar), how long a video was watched and what order videos were watched. This information will be anonymised and will be held in AVV but will be controlled

by your controller. Antser will only collect, store and make the information available for your controller to download for the controller's purposes.

- f) Information from others: AVV will collect content that other users provide about you (if any) when they use AVV. This can include information about you, such as when they send us a report that refers to you or contains a video of you. The information will be held in AVV but will be controlled by your controller. Antser will only collect, store and make the information available for your controller to download, for the controller's purposes.
- Information automatically collected about you when you use AVV: AVV collects information automatically when you are connected to it. Depending on how you access and use AVV, in addition to items listed above (which you can choose not to provide, if you choose to limit how you interact with AVV) it collects:
  - a) Device information: AVV acquires information about devices that you use to connection to and interact with AVV. The information uniquely identifies each device.
  - b) Location-related information & Technical Data: AVV acquires your device's IP address (its address on the internet), and if applicable will collect the type of browser used, language and computer operating system. If you're using a mobile device, and you have permitted the device to share your location (either generally, or specifically for AVV) AVV will acquire the device's location using available sources, which are likely to include the device's GPS signal and information about nearby Wi-Fi networks.
  - c) Device User Preferences: AVV will detect relevant device settings, such as your preferences for picture, photo, audio or video content.
- Information from other sources: Your controller (not AVV) may combine your personal data that is acquired by AVV with other information that is available to your controller, such as information about you from third party sources that make your information publicly or commercially available.
- Information that you provide about other people: If you are over 18 and you use AVV as part of your job, you must not provide any information via AVV if the information relates to any third party (such as your relatives, friends, customers, staff, contractors or suppliers), unless an exception applies or you have first got their permission in accordance with data protection law. If no exception applies, you should share a copy of this privacy notice with those other individuals before disclosing any personal data about them via AVV. Ask your controller, employer or an independent adviser for guidance if you are unsure.
- Sensitive Data collected via interactive sessions on the AVV: depending on which service you use on the AVV, the AVV may collect Sensitive Data that is exchanged on the AVV platform, including any content, post, video, and discussions held on the AVV Platform.

## How AVV will use information about you

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Your controller and Antser (and its service providers who help to provide AVV) are required by data protection law to ensure that there is a legal basis to permit processing of your personal data within AVV. These are the main legal bases that AVV will rely on:

- Consistent with your consent, which you may revoke at any time by telling your controller;
- As necessary to comply with your controller's legal obligations (where your controller uses AVV to enable your controller to comply);
- Occasionally to protect your vital interests or those of others; or
- As necessary for your controller's legitimate interests (or those of Antser and its service providers), including Antser's interests in providing AVV for commissioners, controllers and users, in being paid by commissioners, and in providing an innovative, personalised and safe service for users and partners, unless those interests are overridden by your interests or fundamental rights and freedoms that require protection of your personal data.

Where AVV processes your Sensitive Data, your controller, Antser and its service providers must also ensure that an exception applies permitting that processing. These are the main exceptions that AVV will rely on ("**Sensitive Data exceptions**"):

- Your consent, which you may revoke at any time by telling your controller;
- Occasionally to protect your or another person's vital interests where physically or legally incapable of giving consent;
- Establishment, exercise or defence of legal claims;
- For reasons of substantial public interest (which will need to be confirmed by your controller, but are likely to be administration of justice, equality of opportunity or treatment, preventing or detecting unlawful acts, protection against dishonesty, unlawful act/ dishonesty regulatory requirements, preventing fraud, support for individuals with a particular disability or condition, counselling, safeguarding of children and other individuals at risk, economic safeguarding of certain individuals); or
- To provide health or social care or treatment, or to manage health or social care systems and services.

The following table lists the main purposes for which AVV will use your personal information and, for each purpose, states the legal basis relied upon and (where applicable) the Sensitive Data exception relied upon. Your controller, Antser and its service providers may also rely on any exemptions which are available under data protection law, but exemptions are not listed here.

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**AVV uses your personal data as set out below:**

<b>Purpose</b>	<b>Legal basis (and, where applicable, Sensitive Data exceptions)</b>
To provide you with the AVV (including its content and associated apps and experiences, including customisation of AVV features where applicable), on which to communicate virtually.	Legitimate interests as described in the rubric above. If your controller is a public body, the legal basis may be performance of a public task carried out in the public interest, or in exercise of official authority vested in the controller. Where there is any Sensitive Data: AVV may rely on any Sensitive Data Exceptions.
To create accounts and user profiles.	Legitimate interests as described in the rubric above. Where there is any Sensitive Data: AVV may rely on any Sensitive Data Exceptions.
To communicate with users about AVV and to tailor the services provided within AVV.	Legitimate interests as described in the rubric above. Where there is any Sensitive Data: AVV may rely on any Sensitive Data Exceptions.
To enable end-to-end user communications and other social services.	Legitimate interests as described in the rubric above. Where there is any Sensitive Data: AVV may rely on any Sensitive Data Exceptions.
To host the service(s) and provide technical support and maintenance.	Legitimate interests as described in the rubric above. Where there is any Sensitive Data: AVV may rely on any Sensitive Data Exceptions.
To notify users of updates to AVV. These are factual notifications and do not constitute marketing.	Legitimate interests as described in the rubric above. Where there is any Sensitive Data: AVV may rely on any Sensitive Data Exceptions.
To get your feedback about AVV, so Antser can report that to your controller, who may give its own requests and suggestions about AVV based on the feedback. To collect information about how and when users utilise AVV, so that Antser and your controller can identify and design new features, improvements and other changes to AVV.	Legitimate interests as described in the rubric above. Where there is any Sensitive Data: AVV may rely on any Sensitive Data Exceptions.

<b>Purpose</b>	<b>Legal basis (and, where applicable, Sensitive Data exceptions)</b>
<p>To tell staff of Antser’s existing and prospective customers and commissioners of AVV (who may also be controllers) about new products or features available from Antser or its partners in relation to AVV. These are marketing, sent by email, and will not be sent to users in their capacity as users.</p>	<p>Hard opt-in (consent) acquired by the controller or by Antser from the person who the marketing is sent to.</p> <p>Alternatively, soft opt-in (acquired by implication if Antser informs the person and offers them opportunities to opt out) acquired by Antser from the person who the marketing is sent to.</p> <p>You can contact <a href="mailto:DPO@antser.com">DPO@antser.com</a> if you would like to withdraw your consent or opt out of receiving marketing emails.</p>
<p>To correspond and meet with staff of Antser’s existing and prospective customers in order to manage and administer those customers’ accounts and contracts with Antser, payments to and front Antser, and services from Antser (including AVV).</p>	<p>Legitimate interests as described in the rubric above. Where there is any Sensitive Data: AVV may rely on any Sensitive Data Exceptions.</p>
<p>To identify and address technical issues with AVV.</p>	<p>Legitimate interests as described in the rubric above. Where there is any Sensitive Data: AVV may rely on any Sensitive Data Exceptions.</p>
<p>To help promote safety and security on AVV, such as by investigating suspicious activity or breaches of Antser's terms or policies for users and protecting Antser’s or others' rights or property.</p>	<p>Legitimate interests as described in the rubric above. Where there is any Sensitive Data: AVV may rely on any Sensitive Data Exceptions.</p>

In some circumstances Antser may anonymise your personal data for research or statistical purposes. Anonymised information is not personal data, so data protection law does not apply to it, and Antser will use the anonymised information indefinitely for any purpose.

**Data sharing and location of your personal data**

Your controller may share your personal data with Antser and its third-party service providers and other entities in Antser’s group for the purposes described above.

Your personal data may be stored and used by Antser and its service providers in the UK or in any EU or EEA member state. If you or your controller are located in another part of the world, Antser and its service providers may transfer your personal data to that location or make it available to you or your controller for access or download in that location.

The services on the AVV allow users to engage with the virtual reality ecosystem and others service providers and users that interact with it. To provide and support AVV, personal data that is acquired by AVV is shared with third parties. The following details who the third parties are, and the purposes for which they process your personal data.

- People and Accounts You Share and Communicate With: When you share, interact and communicate using AVV, other people who access that area, for example, when you share a virtual meeting room with someone, will be able to see the information that you share in that room.
- Content others share about you: You should consider who you choose to share your information with, because people who are able to see your activity, content or information on AVV may choose to share it with others on and off AVV.
- Antser's Processors: Antser will share your personal data with its third-party services providers and their respective group companies who work at Antser's direction to support the AVV. This includes third parties who:
  - a) develop, maintain, support and provide Antser with the AVV including the platform, its features, functions and content, and associated apps and other experiences;
  - b) create accounts and user profiles;
  - c) enable end-to end user communications and other social services;
  - d) host the service(s) and providing technical support and maintenance (and this may require Antser or the third party to communicate directly with you to diagnose a fault with AVV);
  - e) collect usage metrics, for example relating to the date a post was created, how long a video was watched and what order videos were watched and other information about the way that you interact with the AVV;
  - f) fulfil orders, facilitate payments, process credit card payments, provide customer service and send electronic communications for Antser.

Antser and its service providers and their respective group companies will share your personal data with third parties where required or permitted by law.

### **Data Retention and Deletion**

- Personal data: Except as stated below, Antser and its service providers and their respective group companies will store and retain your personal data as long as you are a registered user for AVV, and then for seven (7) years after you cease to be a user (for tax, compliance, legal claim and defence and dispute resolution purposes which may arise during that period).
- Files/ content you share/transfer: When you share or transfer any files or content that constitutes your personal data on the AVV, these will automatically be permanently deleted from the AVV after fourteen (14) days. They may be downloaded by your controller in the meantime.
- Account deletion: When you delete your user account, AVV automatically deletes



material you have posted and information about apps and entitlements you have downloaded, and you will not be able to recover this information later. Information that others have shared about you is not part of your account and will not be deleted when you delete your account.

## **Your rights in relation to your personal data**

Under certain circumstances, by law you have the right to:

- **Request access** to your personal data (commonly known as a "**data subject access request**") held on AVV. This enables you to receive a copy of the personal data to check that it is being processed lawfully.
- **Request correction** of the personal data that is held on AVV. This enables you to have any incomplete or inaccurate personal data that is held on AVV corrected.
- **Request erasure** of your personal data that is held on AVV where there is no good reason for the personal data to continue to be processed on AVV. You also have the right to ask to delete or remove your personal data where you have exercised your right to object to processing of your personal data on AVV (see below).
- **Object to processing** of your personal data where the processing relies on a legitimate interest and there is something about your particular situation which makes you want to object to the processing in AVV on this ground. You also have the right to object or require a stop to marketing, if AVV processes your personal data for direct marketing purposes.
- **Object to or stop marketing by Antser** In the limited circumstances where Antser sends marketing in relation to AVV, if you receive such marketing you also have the right to object or require Antser to stop marketing. To exercise this right (or to withdraw a related consent or opt-in), please contact [DPO@antser.com].
- **Request the restriction of processing** of your personal data. This enables you to ask for the processing of your personal data on AVV to be suspended or limited, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal data to another party, if the legal basis for processing your personal data within AVV is consent.
- **Withhold or withdraw consent (or opt-in)** Where you may have provided your consent or have opted in to the processing of your personal data for a specific purpose, you have the right to withdraw your consent or opt-in for that specific processing at any time. Where you withdraw consent or opt-in, the specific processing of your personal data on AVV that relied on consent will stop, unless there is an alternative legal basis for the processing.
- **Complain to the regulator** If you have any concern or a complaint about how AVV (or Antser) uses your personal data, please contact your controller (or Antser, in relation to marketing from Antser) using the contact details it has provided to you, so that they can take the opportunity to address the matter for you. In addition, you

have a right to complain to the Information Commissioners Office at <https://ico.org.uk/make-a-complaint/>.

To exercise the rights which are underlined (above), please contact Antser.

To exercise any of your other rights, please contact your controller in the first instance. If you contact Antser, Antser will normally forward your request to its relevant customer, for onward forwarding to your controller, and this may cause a delay in your request being considered or fulfilled.

If you withdraw your consent, or exercise your right to object, stop, erase or restrict, it may no longer be possible to provide the AVV, or to comply with your earlier instructions (if withdrawal of your consent means that your previous instructions or relevant personal data are no longer recorded within AVV). Where Antser or your controller needs to collect personal data by law, or under the terms of a contract that you are party to, and you fail to provide that personal data when requested, Antser and your controller may not be able to perform the contract.

### **If you are reading this notice on behalf of someone else**

If you make decisions on behalf of another person, such as a child, about their personal data, you should ensure that you have read and digested this notice fully and from that person's perspective as well as from your own perspective. If the person is able to, you should also explain to that person, in terms that they are able to understand, the contents of this notice.

### **Changes to this privacy notice**

Antser may update this notice at any time. The version of the privacy notice that is provided by Antser as part of the AVV is the latest version of Antser's version of their standard privacy notice.

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