

# Compose Privacy Notice

## Your privacy and this Notice

**Effective date: March 2021**

Your privacy and protecting your personal data is important to us.

The purpose of this privacy notice (**Notice**) is to explain how we use your personal data so that you understand what data we collect, how we use it and who we share it with.

This notice also sets out the rights available to you.

## Who we are

We are Quanterium Technologies, the makers of Compose, a desktop application that allows users to connect multiple messaging accounts into one application.

References to "**we**", "**us**", "**our**" and "**Quanterium**" in this document are references to Quanterium Technologies Limited which is the controller of your personal data. Our company details are Quanterium Technologies Limited with registered office address Northcliffe House Young Street, Care Of Founders Factory, London, England, W8 5EH and our company number is 11360578.

If you have any questions about this Notice or how we use your data, then our details are provided in the "Contact us" section below.

## Who this Notice applies to

This Notice applies to Compose users and also applies if you are a visitor to our website at <https://compose.im/>, or if you contact us online, by telephone, post or by any other method.

We do not offer, nor do we intend for Compose to be used by individuals under the age of 16. If you are under 16, please do not use Compose. If you believe an individual under the age of 16 has created a Compose account, please contact us and we will take measures to delete any data associated with such an account.

## What personal data we collect

We do not process the contents of the messages or files you exchange through Compose using services such as WhatsApp, Telegram, Gmail, Zoom or any other third-party service (**Third-Party Integrations**). We do not have visibility over your messages or files, and the data connected to such messages and files is not transmitted through or retained on our servers. All messages and files you share through Compose using Third-Party Integrations are stored locally on your desktop, and transferred through the relevant third **Third-Party Integrations** systems.

Depending on the nature of the relationship you have with us and how you use Compose, we may collect the following personal data about you:

- **Account information**

Your name, home address, telephone number, email address, password and username and payment information connected to a subscription you have.

- **Waitlist survey information**

Your response to survey questions where you complete them through our third party survey platform.

- **Device and connection information**

Details of the device you use to connect to Compose, including a unique device identifier, the IP address and technical details of the device you're using, and the time at which it last connected to Compose.

▪ **Correspondence information**

Information we collect from you when you contact us as a user of Compose, for example to seek support or to make a complaint, or in another capacity, such as your email address and the contents of your email message.

▪ **Transaction information**

Information we collect from you when you subscribe to Compose, such as your payment card details.

▪ **Usage metrics**

Aggregated and non-aggregated information about your use of Compose, including the time(s) and duration of your use.

## How we use your data

The purposes for which we may use your data are as follows:

- Setting up your Compose account
- Providing you with customer services and assistance relating to Compose
- Communicating with you and assisting you with managing your account
- Facilitating your use of Third-Party Integrations
- Processing payments associated with your subscription to Compose
- Providing you with information about our products and services
- Improving our products and services
- Training our staff
- Administration of our business
- Compliance with laws that are applicable to us
- Defending ourselves and bringing claims in relation to legal proceedings

Any use and transfer to any other app of information received from Google APIs will adhere to [Google API Services User Data Policy](#), including the Limited Use requirements.

Further information about the purposes for which we may use your data, the categories of personal data that are relevant to each purpose and the lawful basis we rely upon is set out in the table below.

PROCESSING PURPOSE	CATEGORIES OF DATA	LEGAL BASIS FOR PROCESSING
<b>Account set up</b> <ul style="list-style-type: none"><li>▪ Setting up your account with us</li><li>▪ Taking all other necessary steps to make Compose available to you</li></ul>	<ul style="list-style-type: none"><li>▪ Account information</li><li>▪ Device and connection information</li><li>▪ Usage metrics</li></ul>	Necessary for performance of the contract between you and us

<p><b>Customer services</b></p> <ul style="list-style-type: none"> <li>Provide you with assistance with access to and use of Compose online and over the telephone</li> <li>Reviewing and respond to any queries, issues and complaints you may have</li> </ul>	<ul style="list-style-type: none"> <li>Account information</li> <li>Device and connection information</li> <li>Correspondence information</li> <li>Usage metrics</li> </ul>	<p>Our legitimate business interests in providing support to you Necessary for performance of the contract between you and us</p>
<p><b>Communicating with you and managing your account</b></p> <ul style="list-style-type: none"> <li>Providing you with access to your account</li> <li>Inform you about important details relating to your account</li> <li>Provide you with notifications and alerts relating to your account</li> </ul>	<ul style="list-style-type: none"> <li>Account information</li> <li>Correspondence information</li> <li>Usage metrics</li> </ul>	<p>Necessary for performance of the contract between you and us</p>
<p><b>Marketing purposes</b></p> <ul style="list-style-type: none"> <li>Email marketing</li> </ul>	<ul style="list-style-type: none"> <li>Account information</li> <li>Device and connection information</li> <li>Correspondence information</li> </ul>	<p>Your consent</p>
<p><b>Improve our products and services</b></p> <ul style="list-style-type: none"> <li>Review, improvement and development of our products and services using aggregated and non-aggregated Usage metrics</li> <li>Aggregating certain Usage metrics and linking certain of such data to a unique user ID on our systems</li> </ul>	<ul style="list-style-type: none"> <li>Usage metrics</li> </ul>	<p>Our legitimate business interests</p>
<p><b>Staff training</b></p> <ul style="list-style-type: none"> <li>Use recordings of communications with you (e.g. telephone calls and online chats) to provide staff training and improve the quality of our customer services</li> </ul>	<ul style="list-style-type: none"> <li>Correspondence information</li> </ul>	<p>Our legitimate business interests</p>
<p><b>Payment processing</b></p> <ul style="list-style-type: none"> <li>Where you hold a subscription to Compose we will collect payment information from you and share this with our third party payment provider</li> </ul>	<ul style="list-style-type: none"> <li>Account information</li> </ul>	<p>Necessary for performance of the contract between you and us</p>

<p><b>Administration of our business</b></p> <ul style="list-style-type: none"> <li>Transfers to prospective or actual buyers of an interest in our business</li> <li>Receipt of professional services (e.g. legal advice)</li> <li>Financial management such as internal audits</li> <li>Production of management information reports to analyse our performance</li> </ul>	<ul style="list-style-type: none"> <li>Account information</li> <li>Usage metrics</li> </ul>	<p>Our legitimate business interests</p>
<p><b>Compliance with laws applicable to us</b></p> <ul style="list-style-type: none"> <li>Complying with our obligations under statutory and/or common law</li> </ul>	<ul style="list-style-type: none"> <li>Data required in order to comply with laws applicable to us</li> </ul>	<p>Necessary for compliance with our legal obligations</p>
<p><b>Legal proceedings and actions</b></p> <ul style="list-style-type: none"> <li>Notification of law enforcement regarding alleged or potential criminal activities</li> </ul>	<ul style="list-style-type: none"> <li>Data required in order to address legal processings and actions</li> </ul>	<p>Our legitimate business interests</p>

## Who we may share your data with and why

We may disclose your data to certain third parties from time to time, including:

- IT suppliers** – such as Amazon Web Services (AWS) or Google Cloud Platform (GCP) which provide data storage and hosting services to us
- Third party payment providers** – which we use to handle payments associated with your subscription to Compose
- Professional advisors** – including accountants, financial advisors, lawyers and other professional advisors that we instruct to support our business
- Law enforcement agencies** – in relation to the detection and prevention of criminal activities
- Prospective purchasers and assignees** – if our business, or part of it, is sold or reorganised.

To receive more information about the third parties that we may share your data with, you can contact us through the information provided in the "Contact details" section below.

## International transfers of data

We do not intend to transfer your data to countries outside of the European Economic Area.

## Your rights

You have various rights that you may be able to exercise in relation to your personal data, including the right to:

- Access** – you can request a copy of your data and information relating to how it is processed

- **Rectification** – you can request any inaccuracies in the data we hold about you be corrected
- **Erasure** – you can request that we erase your data from our records
- **Restriction** – you can request that your data is no longer processed by us
- **Objection** – you can object to certain ways that we process your data
- **Transfer** – you can request that your data be shared with a third party
- **Withdrawal of your consent** – where we are relying on your consent to process your data, then you can withdraw your consent at any time. You can also withdraw your consent to our sending electronic direct marketing to you at any time.

To exercise any of your rights, please contact us on the details set out in the 'Contact details' section of this Notice below.

Please note that some of your rights are not absolute and there may be certain circumstances where we are unable to fulfil a request that you have made.

## Our data security

We use GCP to store your personal data within the European Economic Area. GCP is an industry standard and externally audited data storage provider.

We have implemented appropriate technical and organisational controls to ensure that your personal data are processed securely, such as encryption and authentication during transfer. However, no method of transmission over the internet or of electronic storage is fully secure, and as such, we cannot guarantee its absolute security.

As a responsible member of the technology community, we welcome information relating to data security which may affect our sector (including from "white hat" security experts). Please contact us if you would like to discuss a security concern using the details below at "Contact details".

## Our data retention periods

In general terms we retain your personal data for as long as you hold a Compose account. We may also retain certain personal data such as records of your transactions for different periods, including after the deletion of your Compose account where we are legally required or entitled to do so.

If you are not a Compose user and we collect your personal data (for example, if you contact us through our website) we will usually retain your personal data for a period of 180 days.

You can find more detailed information about our purposes and periods for retention of specific categories of personal data in the table below. Data will be scheduled for deletion after the retention periods in the table below. We may also retain aggregated and anonymised Usage metrics for longer periods.

PURPOSE	CATEGORIES OF DATA	RETENTION PERIOD
<b>Data retained in order to provide your account and access to Compose</b>	<ul style="list-style-type: none"><li>▪ Account information</li></ul>	Until you delete your account
<b>Data retained in order to mitigate abuse of Compose, debug operational issues, and monitor traffic patterns</b>	<ul style="list-style-type: none"><li>▪ Device and connection information</li></ul>	180 days from the date of collection
<b>Data retained in order to manage queries or complaints</b>	<ul style="list-style-type: none"><li>▪ Account information</li><li>▪ Device and connection information</li></ul>	Until you delete your account

	<ul style="list-style-type: none"><li>▪ Correspondence information</li></ul>	
<b>Usage metrics we collect to improve Compose and understand user usage of it</b>	<ul style="list-style-type: none"><li>▪ Usage metrics</li><li>▪ Waitlist survey information</li></ul>	Until you delete your account and following this for the period we are legally required or entitled to do so
<b>Data retained in order to manage transactions and/or defending ourselves and bringing claims in relation to legal proceedings</b>	<ul style="list-style-type: none"><li>▪ Transaction information</li></ul>	Until you delete your account and following this for the period we are legally required or entitled to do so

## Updates to this policy

We may update this Notice from time to time. For instance, where there are changes in the data we collect about you or the purposes for which we use it.

Whenever there are significant changes to this Notice then we will notify you of these, for example through a popup in our app.

## Contact details

If you have any comments, questions or concerns about how we process your personal data, then please contact us at: [support@compose.im](mailto:support@compose.im).