

# Privacy policy

## 1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors, and service users.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of such persons; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website and services, we will ask you to consent to our use of cookies when you first visit our website.
- 1.4 In this policy, "we", "us" and "our" refer to *Elena Levanova (trading as Mage Software)*. [ For more information about us, see Section 14.]

## 2. Credit

- 2.1 This document was created using a template from Docular (<https://seqlegal.com/free-legal-documents/privacy-policy>).

## 3. The personal data that we collect

- 3.1 In this Section 3 we have set out the general categories of personal data that we process.
- 3.2 We may process data enabling us to get in touch with you ("**contact data**"). The contact data may include your name and/or email address.
- 3.3 We may process your Microsoft or AWS account data that you provide in order to connect our Jira applications to your Git Repositories ("**account data**"). The account data may include your account identifier, name, email address. The primary source of the account data is Microsoft (for Azure Git repositories) or Amazon (for AWS CodeCommit repositories).
- 3.4 We may process information relating to transactions, including purchases of goods and/or services, that you enter into with us and/or through Atlassian Marketplace ("**transaction data**"). The source of the transaction data is Atlassian Marketplace.
- 3.5 We may process information contained in or relating to any communication that you send to us or that we send to you ("**communication data**").
- 3.6 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is Google Analytics.
- 3.7 We may process your Git repositories data ("**repositories data**"). This data may include security tokens to access the source code stored in your Git

repositories, URLs of your Git repositories, your source code metadata (commit/branch/pull request titles and descriptions). The source of this data is Microsoft (for Azure Git repositories) or Amazon (for AWS CodeCommit repositories).

#### **4. Purposes of processing and legal bases**

4.1 In this Section 4, we have set out the purposes for which we may process personal data and the legal bases of the processing.

4.2 **Operations** - We may process your personal data for the purposes of operating our website, providing our services, bills and other payment-related documentation. The legal basis for this processing is the consent that you give when you install our applications through Atlassian Marketplace.

4.3 **Legal claims** - We may process your personal data where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

4.4 **Legal compliance and vital interests** - We may also process your personal data where such processing is necessary for compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another natural person.

#### **5. Providing your personal data to others**

5.1 Your personal data held in our website database OR will be stored on the servers of our hosting services provider Microsoft Azure.

5.3 We will not disclose your personal data to anybody beyond the company boundaries.

#### **6. International transfers of your personal data**

6.1 In this Section 6, we provide information about the circumstances in which your personal data may be transferred to a third country under UK and/or EU data protection law.

6.2 We may transfer your personal data from the European Economic Area (EEA) and other regions to the UK and process that personal data in the UK for the purposes set out in this policy, during any period with respect to which the UK is not treated as a third country under EU data protection law or benefits from an adequacy decision under EU data protection law.

6.3 The hosting facilities for our website are situated in the UK. The competent data protection authorities have made an adequacy determination with respect to the data protection laws of the UK.

#### **7. Retaining and deleting personal data**

- 7.1 This Section 7 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 7.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 7.3 We will retain your personal data for a maximum period of 1 year following the date of the most recent contact between you and us, or your most recent usage of our services.
- 7.4 Notwithstanding the other provisions of this Section 7, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## 8. Your rights

- 8.1 In this Section 8, we have listed the rights that you have under data protection law.
- 8.2 Your principal rights under data protection law are:
- (a) **the right to access** - you can ask for copies of your personal data;
  - (b) **the right to rectification** - you can ask us to rectify inaccurate personal data and to complete incomplete personal data;
  - (c) **the right to erasure** - you can ask us to erase your personal data;
  - (d) **the right to restrict processing** - you can ask us to restrict the processing of your personal data;
  - (e) **the right to object to processing** - you can object to the processing of your personal data;
  - (f) **the right to data portability** - you can ask that we transfer your personal data to another organisation or to you;
  - (g) **the right to complain to a supervisory authority** - you can complain about our processing of your personal data; and
  - (h) **the right to withdraw consent** - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.
- 8.3 These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>
- 8.4 You may exercise any of your rights in relation to your personal data using the contact details set out on our website.

## 9. About cookies

- 9.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 9.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 9.3 Cookies may not contain any information that personally identifies a user, but personal data that we store about you may be linked to the information stored in and obtained from cookies.

## 10. Cookies that we use

10.1 We use cookies for the following purposes:

- (a) **analysis** - we use cookies to help us to analyse the use and performance of our website and services
- (b) **cookie consent** - we use cookies to store your preferences in relation to the use of cookies more generally

## 11. Cookies used by our service providers

- 11.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.
- 11.2 We use Google Analytics. Google Analytics gathers information about the use of our website by means of cookies. The information gathered is used to create reports about the use of our website. You can find out more about Google's use of information by visiting <https://www.google.com/policies/privacy/partners/> and you can review Google's privacy policy at <https://policies.google.com/privacy>.

## 12. Managing cookies

- 12.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:
  - (a) <https://support.google.com/chrome/answer/95647> (Chrome);
  - (b) <https://support.mozilla.org/en-US/kb/enhanced-tracking-protection-firefox-desktop> (Firefox);
  - (c) <https://help.opera.com/en/latest/security-and-privacy/> (Opera);
  - (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);

- (e) <https://support.apple.com/en-gb/guide/safari/manage-cookies-and-website-data-sfri11471/mac> (Safari); and
- (f) <https://support.microsoft.com/en-gb/help/4468242/microsoft-edge-browsing-data-and-privacy> (Edge).

12.2 Blocking all cookies will have a negative impact upon the usability of many websites.

12.3 If you block cookies, you will not be able to use all the features on our website.

### **13. Amendments**

13.1 We may update this policy from time to time by publishing a new version on our website.

13.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

13.3 We may notify you of significant changes to this policy by email.

### **14. Our details**

14.1 This website, and all our services provided through Atlassian Marketplace, is owned and operated by *Elena Levanova (trading as Mage Software)*.

14.3 Our principal place of business is at *5 Tranquil Passage, London, England, SE3 0BJ*.

14.4 You can contact us:

- (a) by post, to the postal address given above;
- (b) using our website contact form;
- (c) by email, using the email address published on our website.