



Shuttle Commander (the “application”) is owned and operated by ENGAGE XR Ltd. ENGAGE XR Ltd is the data controller and can be contacted at [support@engagevr.io](mailto:support@engagevr.io)

**Purpose:**

The purpose of this privacy policy (this “Privacy policy”) is to inform users of our application of the following:

- 1) The personal data we will collect;
- 2) Use of collected data;
- 3) Who has access to the data collected; and
- 4) The rights of the application users

This Privacy Policy applied in addition to the terms and conditions of the application.

**GDPR**

For users in the European Union, we adhere to the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, known as the General Data Protection Regulation (the “GDPR”). For users in the United Kingdom, we adhere to the GDPR as enshrined in the Data Protection Act 2018.

**Consent**

By using our application users agree that they consent to:

- 1) The conditions sets out in this Privacy Policy.

When the legal basis for us processing your personal data is that you have provided your consent to that processing, you may withdraw your consent at any time. If you withdraw your consent, it will not make processing which we completed before you withdrew your consent unlawful.

You can withdraw your consent by emailing [support@engagevr.io](mailto:support@engagevr.io)

**Legal Basis for Processing**

We collect and process personal data about users in the EU only when we have a legal basis for doing so under Article 6 of the GDPR.

We rely on the following legal bases to collect and process the personal data of users in the EU:

- 1) Users have provided their consent to the processing of their data for one or more specific purposes;
- 2) Processing of user personal data is necessary for us or a third party to pursue a legitimate interest. Our legitimate interest is not overridden by the interests or

fundamental rights or freedoms of users. Our legitimate interest is to Perform a Service; and

- 3) Processing of user personal data is necessary for us to comply with a legal obligation. If a user does not provide the personal data necessary for us to preform a legal obligation, the consequences are as follows: The application cannot be accessed.

### **How We Use Personal Data**

Data we collect on our application will only be used for the purposes of specified in this Privacy Policy or indicated on the relevant pages of our application. We will not use your data beyond what we disclose in this Privacy Policy.

### **Who We Share your Personal Data With**

#### Employees

We may disclose user data to any member of our organisation who reasonably needs access to user data to achieve the purposes set out in this Privacy Policy.

#### Other Disclosures

We will not sell or share your data with other third parties, except in the following cases:

- 1) If the law requires it;
- 2) If it is required for any legal proceeding;
- 3) To prove or protect our legal rights;
- 4) To buyers or potential buyers should we seek to sell the company.

If you follow hyperlinks from our application to another application, please note that we are not responsible for and have no control over their privacy policies and practices.

### **How Long Will We Store Your Personal Data**

User data will be stored until the purpose the data was collected has been achieved.

### **How We Protect Your Personal Data**

All data is encrypted and stored on AWS servers. All employees adhere to strict confidentiality agreements. We take all reasonable precautions to ensure that user data is secure and protected.

### **Your Rights As a User**

Under GDPR you have the following rights;

- 1) Right to be informed;
- 2) Right of access;
- 3) Right of rectification;
- 4) Right of erasure;
- 5) Right to restrict processing;
- 6) Right to data portability; and
- 7) Right to object

### **How to Access, Modify, Delete, or Challenge the Data Collected**

If you would like to know if we have collected your personal data, how we use your personal data, if we have disclosed your personal data, and to who we disclosed your personal data, if you would like your data deleted or modified in any way, or if you would like to exercise any of your rights under GDPR, please contact our Data Protection Officer.

Gary O'Brien, [gary.obrien@safeharboursecurity.co.uk](mailto:gary.obrien@safeharboursecurity.co.uk)