

# BarnData Privacy & GDPR Policy

## About BarnData

We are BarnData Ltd, a company registered in England (no 5893579) at Well End Barn, Friday Bridge, Wisbech PE14 0HQ, United Kingdom.

We offer a variety of services, including custom databases, our “FormsFly” mobile app platform and the legacy “CONTACTfile” CRM system.

## This Document

This document outlines how we (hereafter referred to as “BarnData”), handle your data, be it personal or other information. As far as possible, we’ve used plain English to explain how we respect your privacy and why you can trust us with your data.

The document relates to storage of your data on our websites and web systems, including:

- [www.barndata.co.uk](http://www.barndata.co.uk) (main BarnData website)
- [www.boodle-online.co.uk](http://www.boodle-online.co.uk) (BarnData Client Support Portal)
- [www.contactfile.co.uk](http://www.contactfile.co.uk) (CONTACTfile website)

As well as:

- [www.formsfly.com](http://www.formsfly.com) (FormsFly website)

This service has a special Appendix A in this document, containing information specific to FormsFly data privacy issues.

We also host a number of custom browser-based systems, which have been developed for specific clients over the years. There is a special Appendix B in relation to these.

This Privacy Policy applies to all products, services and websites provided by BarnData (collectively referred to as “BarnData Services”), except where otherwise noted. Some of our services have specific supplementary privacy policies, in the appendices to this document.

## Data We Collect About You

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data including first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data including billing address, delivery address, email address and telephone numbers.
- Financial Data including bank account and payment card details.
- Transaction Data including details about payments to and from you and other details of products and services you have purchased from us.

- Technical Data including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access BarnData Services.
- Usage Data including information about how you use BarnData Services.
- Marketing and Communications Data including your communication preferences.

We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose.

Aggregated Data may be derived from your personal data but is not considered personal data as this data does not directly or indirectly reveal your identity.

For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific software feature.

However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## If You Fail to Provide Personal Data

If we need to collect personal data by law, or in order to provide a service to you, and if you fail to provide that data when requested, then we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services).

In this case, we may have to cancel a product or service you have with us. But we will notify you if this is the case at the time.

## How We Collect That Data

We use different methods to collect data from and about you including:

- Direct Interactions.

You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our products or services
- create an account on our website;
- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us some feedback

- Automated Technologies

As you interact with our websites (barndata.co.uk, boodle-online.co.uk, formsfly.com, contactfile.co.uk), we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

## How We Use Your Data

We only use your personal data when the law allows us to.

### To Provide BarnData Services to You

- Customer/Technical Support is the most common reason for us accessing your data, since often we will need to view your account, data and software in order to provide training, advice and troubleshooting.
- Some features of BarnData Services may request your data and/or account information in order to function. If you want to avoid the use of your data in this way, then do not use those specific features. For example, FormsFly provides the facility to send your data to an external service such as DropBox. In order to provide this feature, FormsFly must request your Dropbox login information.

## To Manage the BarnData Services

BarnData may use your account information and data for these limited, internal-only purposes:

- To maintain, monitor and enhance our services. We may perform internal statistical and other analyses on data we collect, including usage data, device data, referral data, app/application data and information from page tags, to measure user behaviour and trends, to understand how people use BarnData Services, and to monitor, troubleshoot and improve those services. This may include prioritising, planning and evaluation of new features. BarnData may use your data for internal-only purposes designed to keep our services secure and operational, such as for troubleshooting and testing purposes, and for service improvement, marketing, research and development purposes.
- To enforce our Terms of Use. Occasionally BarnData may need to review data in your account in order to determine whether there is a breach to our contractual terms.
- To prevent any potentially illegal activities.
- To screen for and prevent undesirable or abusive activity. For example, BarnData has automated systems that screen content for activities such as, phishing, spam, and fraud.
- To create new functionality, services or content. BarnData may internally review your apps, applications and data for the purpose of creating new features, support content or services. BarnData may look at related statistics such as app usage, form entry counts, and average number of fields per screen in order to publish interesting observations about these for training or marketing purposes. When BarnData does this, individuals concerned will not be identified or identifiable, unless we have obtained their permission first.

- To contact you about your service or account. BarnData may occasionally send you communications of a transactional nature (e.g. service-related announcements, billing-related matters, changes to our services or policies, welcome emails when you first register). You are prevented from opt-out of this type of communication since it is required in order to provide our services to you.
- To contact you for marketing purposes. BarnData may send you promotional emails only if you consent to us contacting you for this purpose. You can opt out of these communications at any time by clicking on the “unsubscribe” link in these emails.
- To respond to legal requests and prevent harm. If BarnData receives a subpoena or other legal request, we may need to inspect the data held to determine the appropriate response.

## Who We Share Your Data With

We recognize that you have entrusted BarnData with safeguarding the privacy of your information. Because that trust is extremely important to us, the only time we will disclose or share your personal information or application data with a third party is when we have done one of three things, in accordance with applicable law: (a) given you notice, such as in this Privacy Policy; (b) obtained your express consent, such as through an opt-in checkbox; or (c) anonymised or aggregated the information so that individual persons or other entities cannot reasonably be identified by it.

We may share:

- Your data with our sub-processors. We use third-party service providers (“sub-processors”) to help us provide you with certain BarnData Services (in particular, FormsFly). BarnData gives these sub-processors access to your data, but only to the extent necessary for them to perform their services for us. Reasonable contractual and technical protections are in place to ensure that your personal information and data remains confidential, is used only for the provision of their services to us, and is handled in accordance with this Privacy Policy. Examples of sub-processors include payment processors, email providers, and analytics tools. A list of our sub-processors is available on request.
- Your email address with your organisation. If the email address under which you’ve registered your BarnData/FormsFly account belongs to or is controlled by an organisation, BarnData may disclose that email address to that organisation in order to assist the organisation with its BarnData/FormsFly account administration. Do not use a work email address for BarnData Services unless you are authorised to do so, and are therefore comfortable with this potential disclosure.
- Aggregated or anonymised data with third parties to improve or promote BarnData Services. We ensure that no person can be reasonably identified or linked to any data we may share with third parties for the improvement or promotion of BarnData Services.
- Your data if required or permitted by law. BarnData may disclose your information as required or permitted by law, or when BarnData believes that disclosure is necessary to protect our rights, protect your safety or the safety of others, and/or to comply with a judicial proceeding, court order, subpoena, or other legal process served on us.
- Your information if there’s a change in our business ownership or structure. If ownership of all or substantially all of BarnData’s business changes, or if BarnData undertakes a corporate reorganisation, including a merger, acquisition or consolidation or any other action or

transfer between BarnData entities, BarnData will transfer your information to the new owner or successor entity so that we can continue providing BarnData Services. If required, BarnData will notify the applicable data protection agency in each jurisdiction of such a transfer in accordance with the notification procedures under applicable data protection laws.

- Information you explicitly consent to be shared. BarnData may occasionally explicitly ask for your permission to provide your contact details to third parties for some agreed purpose(s). You may later revoke your permission, but if you wish to stop receiving communications from a third party to which we provided your information with your permission, you will need to contact that third party directly.

## Your Data Rights

You can exercise the following rights over your data that BarnData holds:

- [Update Your Account Details](#)

You can immediately update your Boodle/FormsFly/CONTACTfile account information, and that of your FormsFly app users, via the provided organisation and user editing pages.

- [Access and Correct Personal Information](#)

Account administrators may be able to access and correct certain personal information that BarnData holds about you by visiting the provided user edit page online. Some app users and other individuals may have certain legal rights to ascertain if we hold personal information about them, to access personal information we hold about them, and to pursue its correction, update, amendment or deletion in appropriate circumstances. Depending on the information involved, these rights may be exercised through the user or organisation edit pages previously mentioned. For all other cases, requests to exercise these rights may be directed to our support team. These rights are subject to some exceptions, such as where executing the request would have an unreasonable impact on the privacy of other individuals. BarnData will respond to requests to exercise these rights within a reasonable time and, where required by law or where we deem it otherwise appropriate and practicable to do so, we will honour your request.

- [Download/Backup Your Data](#)

For most of our services, we provide functionality to export your data in a variety of formats. This allows you to create your own backups or conduct offline data analysis. Where such a facility does not exist, BarnData will honour requests to provide a backup of your data within a reasonable timeframe.

- [Delete Your Data](#)

In some instances, deleting data may not permanently delete that data immediately. As long as you maintain an account with BarnData, we may retain your deleted data for a limited time, but no longer than 30 days, to cover cases where you accidentally delete data and need to restore it (which you can request by contacting our support team). To the extent permitted by law, BarnData will permanently delete your data if you request to cancel your account.

- [Cancel Your Account](#)

To cancel and delete your account, please contact our support team. Deleting your account will cause all the data in the account to be permanently deleted from our systems within a reasonable time period, as permitted by law, and will disable your access to that service. BarnData will respond to any appropriate request to access, correct, update or delete your personal information within the time period specified by law, if applicable, or without excessive delay. BarnData will promptly fulfil requests to delete personal information unless the request is not technically feasible or where such data is required to be retained by law, in which case BarnData will anonymise such data instead.

If you should need any assistance with exercising the above data rights, please do not hesitate to contact us (see the contact section at the end of this document).

## Data Retention Timeframes

We retain your data for as long as you have an account for BarnData Services, or to comply with our legal obligations, resolve disputes, or enforce our contracts and agreements. Copies of data deleted from our servers may remain on offsite backup media for up to 30 days thereafter.

For specifics relating to the FormsFly service, please see the separate FormsFly Privacy Policy in the Appendix.

## Other Important Information

### [Changes to this Privacy Policy](#)

BarnData may modify this Privacy Policy at any time. We will notify you by publishing the changes on this website. If BarnData determines the changes are material, you will be provided with additional, prominent notice as is appropriate under the circumstances, such as via email or in another conspicuous manner reasonably designed to notify you. If, after being informed of these changes, you do not cancel your subscription and continue to use BarnData Services beyond the advance-notice period, you will be considered as having expressly consented to the changes in the Privacy Policy. If you disagree with the terms of this Privacy Policy or any updated Privacy Policy, you may close your account at any time.

### [Security](#)

We provide details on our security measures webpage. BarnData takes security seriously and we're committed to processing your personal information and data with respect and integrity. However, regardless of the protections and precautions undertaken, there is always a risk that your personal information may be viewed and used by unauthorized third parties as a result of collecting and transmitting your data through the Internet. If you have any questions about the security of your personal information, contact our support team.

### [Cookie Notification](#)

BarnData and our partners use cookies and similar technologies on our websites. Cookies are small bits of data we store on the device you use to access our services so we can recognize repeat users. Each cookie expires after a certain period of time, depending on what we use it for. BarnData uses cookies and similar technologies for several reasons:

- For security reasons. We may store your login details in an encrypted cookie to authenticate your identity and to keep you logged into BarnData Services between usage sessions.
- To provide you with personalized content. BarnData may store user preferences, such as your default language, in cookies to personalize the content you see.
- To improve our services. BarnData uses cookies to measure your usage of our websites and track referral data, as well as to occasionally display different versions of content to you. This information helps us to develop and improve our services and optimize the content we display to users.

We don't believe that cookies are bad, but you can still choose to remove or disable cookies via your browser. Note that if you choose to disable cookies received from some of our websites (eg FormsFly Admin area), you will not be able to log in there, since we require cookies to be enabled for the security reasons above. By using our websites and agreeing to this Privacy Policy, you expressly consent to the use of cookies as described in this policy.

### Blogs and Forums

BarnData websites may offer publicly accessible blogs and community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. BarnData is not responsible for any personal information you choose to submit in these areas of our sites. To request removal of your personal information from our blog or community forum, contact our support team. In some cases, BarnData may not be able to fulfil your request and an explanation will be provided in those cases.

### Social Media Features

BarnData websites may include social media features or widgets, such as the Facebook Like button. Use of these features may allow them to collect your IP address, detect which page you are visiting on our site, and set a cookie to enable the feature to function properly. Your interactions with these features are governed by the privacy policy of the third party providing it.

### Safety of Children

BarnData Services are not intended for and may not permissibly be used by individuals under the age of 16. BarnData does not knowingly collect personal information from persons under 16 or allow them to register. If it comes to our attention that BarnData has collected personal information from such a person, we may delete this information without notice. If you have reason to believe that this has occurred, please contact our support team.

## GDPR

References to "personal information" in this policy are equivalent to "personal data" as defined in prevailing EU data protection regulations.

### IP Addresses

Our servers may record the incoming IP addresses of visitors to BarnData websites and services, whether or not the visitor has a BarnData account, and store the IP addresses in log files. BarnData uses these log files for purposes such as system administration and maintenance, record keeping, tracking referring web sites, inferring your location, and security purposes (eg controlling abuse,

spam and DDOS attacks). BarnData may also store IP addresses along with certain actions you take on our system. By agreeing to this Privacy Policy, you expressly consent to BarnData using your IP address for the above purposes. If you wish to opt out from the above consent to use your IP address, you must cancel your account (if you have one) and/or not interact with apps and applications created on BarnData Services where requested to do so.

### Accessing and Correcting Your Personal Data

You have the right to access and correct the personal information that BarnData holds about you. This right may be exercised by visiting the provided “edit user” pages or by contacting our support team.

### Your Responsibilities

By using BarnData Services, you agree to comply with adequate data protection requirements when collecting and using your app data, such as requirements to inform respondents about the specific uses and disclosures of their data.

### Your Data is Hosted Within the UK

With the exception of FormsFly, all BarnData hosted services (including client’s own custom online systems) are physically located within the United Kingdom. For more information on FormsFly data locations, please see the specific FormsFly Privacy Policy appendix to this document.

### Data Controller

BarnData is the Data Controller (for GDPR purposes) at the following sites:

- [www.barndata.co.uk](http://www.barndata.co.uk) (main BarnData website)
- [www.boodle-online.co.uk](http://www.boodle-online.co.uk) (BarnData Client Support Portal)
- [www.contactfile.co.uk](http://www.contactfile.co.uk) (CONTACTfile website)

For [www.formsfly.com](http://www.formsfly.com), please see the FormsFly Privacy Policy appendix.

For clients’ own custom online systems, please see the Custom Online Systems Privacy Policy appendix.

## BarnData Contact Information

If you have any concerns or queries, you can contact us in any of the following ways:

- BarnData Ltd  
Well End Barn  
Friday Bridge  
Wisbech  
PE14 0HQ  
United Kingdom
- Freephone : 0800 01 968 10  
International/Mobile: 01978 71 22 22
- Email: [info@barndata.co.uk](mailto:info@barndata.co.uk)



## Appendix A – FormsFly

The following additional information, regarding our FormsFly mobile app platform, should be read in conjunction with our main Privacy Policy above.

This appendix outlines any areas where our FormsFly Privacy Policy differs, as well as information which is only pertinent to FormsFly.

### The FormsFly Service

The FormsFly platform allows you to create mobile forms and other screens, and then to combine them to develop a custom mobile business app. As a FormsFly client, you might create the forms and screens yourself, or you might instruct us to do it for you. Either way, for the purposes of this document, you are then the App Creator. You will then allow one or more users to access and interact with the app you have created.

The “FormsFly Service” consists of the FormsFly Web Admin Platform plus the mobile app itself.

#### The Web Admin Platform

This is where an App Creator can create and modify their app, and manage the data collected by that app. Login to the web Admin Platform is at <https://secure.formsfly.com>

#### The Mobile App

The mobile app can be downloaded from the relevant app store and runs on the users’ mobile devices. Users may belong to the same organisation as the App Creator, or they may be from a third-party organisation. They may even be individuals.

Some users may be able to access just the Web Admin Platform, some may only be able to access the mobile app. Some users may be able to access both services.

#### GDPR - Data Controller, Data Processor

For the purposes of GDPR, the App Creator is the Data Controller, and BarnData is the Data Processor, in respect of FormsFly mobile apps.

### Data We Collect About You & Your Users

When you as an App Creator (or your FormsFly users) interact with mobile apps powered by FormsFly, we collect and process information relating to you and your use of the FormsFly Service from a variety of sources, which are listed below, along with details of how we use this information. All collection and processing of such information is on behalf of - and upon instruction of - the App Creator.

#### Information we collect directly from you and your users

- App Data  
We collect and store the app data that you and your users interact with, modify or submit. The App Creator is responsible for this data and manages it. An app may ask you to provide personal information or data. If you have any questions about an app, please contact the App Creator directly, as BarnData is not responsible for the content of that app. The App

Creator is generally the same person, company or organisation that invited you to access the app, and they may have their own privacy policy for you to refer to.

#### Information we collect indirectly or passively

- User Account Information

If you are to be a user of a FormsFly app which was created by someone else, then you will usually require a FormsFly account before you can access apps created on the FormsFly Service. The App Creator or your account administrator will normally create your user account, and in doing so will provide us with your name, email address, country and time zone. These details are required in order to provide you with app user access on the FormsFly Service.

- Usage Data

BarnData collects usage data about you whenever you interact with the FormsFly Service. This may include which web pages you visit, what you click on, when you performed those actions, and so on. Additionally, as with most websites today, FormsFly servers keep log files that record data each time a device accesses those servers. The log files contain data about the nature of each access, including originating IP addresses, internet service providers, the files viewed on our site (eg HTML pages, graphics, etc), operating system versions, and timestamps. Note that BarnData does not link this usage data to your submitted app data.

- Device Data

BarnData collects data from the device you use to access our services, such as your IP address, operating system version, device make and model, performance information, and browser type. We may also infer your geographic location based on your IP address.

- Referral Data

BarnData may record information about the source that referred you to an app (eg a web link or in an invite email).

#### How We Use Your Data

The data from your app interactions is owned and managed by the App Creator, and BarnData treats that information as private to the App Creator. Please contact the App Creator directly to understand how the individual, company or organisation uses your app data. BarnData does not sell or make available, FormsFly app data to third parties, beyond what is necessary to provide the FormsFly Service, without the App Creator's instruction. BarnData does not use any contact details collected in our customers' apps to contact persons recorded in said app data.

BarnData also uses the information collected from you, including usage data, device data, referral data and information from page tags, to manage and improve our services, for research purposes, and for the various purposes described in this Privacy Policy.

## Appendix B – Custom Systems

The following additional information, regarding custom browser-based systems created by BarnData, should be read in conjunction with our main Privacy Policy above.

This appendix outlines any areas where our Custom Systems Privacy Policy differs, as well as information which is only pertinent to custom systems.

### Custom Development

A Custom Browser-Based System is any system developed by BarnData especially for you – the “Client” – and which will run in a web-browser. We will have previously agreed a specification for the system with you, and will then have produced a system to meet that specification.

Your authorised users, who may be from within your organisation, from third-party organisations, or perhaps individuals, will access the system using a web browser on their PC, Mac or other device.

#### GDPR - Data Controller, Data Processor

For the purposes of GDPR, the Client is the Data Controller, in respect of custom browser-based systems, wherever they may be hosted.

Where the Client hosts the system on their own server(s), then the Client is also the Data Processor. If the system is hosted by BarnData on the Client’s behalf, then BarnData is the Data Processor. If the Client has the system hosted by a third party, then the Client should refer to that third-party’s Privacy, Data Protection or GDPR Policy. If in doubt, please contact the third party in question for further information.

### More Information

For specific information on the data held in a particular custom system, you should contact the Data Controller (the Client who commissioned the project), and ask to see their Privacy Policy, Data Protection Policy and/or GDPR Policy. If you are a user of the system, then the Client is usually the person or organisation that invited you to use the system, or who granted you access to the system. If in doubt, please feel free to contact BarnData (see our Contact information at the end of the main Privacy Policy above).