

Caption Pro Privacy Policy

Updated June 2024

Your privacy is important to us at Caption Pro Ltd (“Caption Pro”). This privacy policy will explain how our organization uses the personal data we collect from you when you use our website or our app.

Topics:

- **What data do we collect?**
- **How and why we use your data**
- **Sharing your data**
- **Retention of your data**
- **Transfer of your data**
- **Security**
- **Your privacy rights and choices**
- **Cookies**
- **Changes to our privacy policy**
- **Contact**

What data do we collect?

The personal data that we collect falls into the categories set out in the following table. Some of this information you provide voluntarily when you interact with the service or our website and other information gets collected automatically from your device.

Our service as a Data Processor also facilitates the processing of biometric information. Details of what data we collect and store for this process can also be found in the table below.

Registration and contact information

This is information that you will fill in when creating an account with us or that we may collect when you make an inquiry about our services.

- First and last names;
- Email addresses;

- Phone numbers;
- Company name;
- Job title;
- Encrypted password

Payment information

This is information that we collect in order to accept payments for our services. Some of these may not apply to you, depending on the payment method chosen.

- Credit card information;
- Billing and mailing addresses;
- Other payment-related information.

Device data

This is information that we collect from our website or app that is taken directly from your device,

- Operating system type and version number;
- Browser type;
- Unique device identifiers.
- IP address
- Paths of files used within the app

Service data

- How you interact with our emails;
- How you interact with our website;
- Dates and times;
- Links clicked;
- How you interact with our app such as information relating to the images that you process (quantities of images, faces and text processed etc) as well as tracking actions and processes you take on our app.

Third party source data

We rely quite heavily on market research and direct outreach to find clients. As such we might find information about you online through your website, search engine results or social media sites which we will add to our CRM to track our outreach to you. This includes:

- Social media profile information;
- Email addresses;
- Phone numbers;
- Job titles;
- Location information.

Data that we handle as a Data Processor to facilitate the AI functionality

Our app enables users to identify people in images with the help of AI. In order to do this we have to collect data from content that users upload to our app and process this accordingly. The data that we collect and store to facilitate this includes:

- The images that users process;
- The user-added names of the people in the images;
- The user-added names of people in 'number lists';
- Face vectors that map out the faces of people in your images, enabling the system to know when one face matches another.

How and why we use your data.

We collect and process your data for the following purposes:

- **Providing and facilitating delivery of the Caption Pro services and site:** We process your personal data to perform our contract with you and to fulfill our obligations under the applicable terms of service. Where we have not entered into a contract with you, we process your personal data in reliance on our legitimate interest to operate and administer our Services. For example to create, administer and manage your account.
- **Communicating with you about the Caption Pro service:** We may send you service, technical and other messages in reliance on our legitimate interests in administering the Caption Pro services. We may process your personal data for outreach, responding to comments and questions and to provide customer care and support.
- **Improving the Caption Pro services:** We process your usage data to analyze overall trends, improve the features and functionality of the app and our website and we do so on the basis of our legitimate interest in providing a well functioning website and application for our users and visitors.
- **Security:** We process your personal data - including your usage data - for the purposes of maintaining a secure service for all of our users. We do this on the basis of the legitimate interest in promoting the safety and security of our service and to protect our rights and the rights of others.
- **Carrying out other legitimate business purposes:** Such as invoicing and audits.

Sharing your data.

We may disclose some or all of the data we collect to the following third parties:

Service providers:

We engage with certain third parties for the technical facilitation of our services to you. A full list of these service providers, including what they do and links to their own privacy policies can be found on our [Subprocessors List](#).

Customers or organizations with whom you are affiliated:

In certain instances, where you are involved in a team or enterprise account, we may need to share certain user-uploaded content, personal information and usage information with account administrators for that organization or the organization's account as a whole.

Professional Advisors:

Such as lawyers, auditors and insurers during the course of professional services rendered to us.

Compliance with Law Enforcement:

To comply with applicable laws, lawful requests and legal processes or to protect our, your or other's rights to privacy

Business transfers:

Parties to transactions or potential transactions (and their professional advisors) involved in a corporate acquisition or similar proceedings.

Retention of your data

We retain your personal data only for as long as necessary to fulfill the purposes set out in this privacy policy.

Transfer of your data

Certain subprocessors may be based outside of the EEA and in those cases we take steps to ensure that they are either based in a country or territory covered by adequate regulations in accordance with UK GDPR, or that the companies themselves have adequate GDPR-compliant privacy policies. Please see our [Subprocessors List](#) for more information about the location and the respective privacy policies of our Subprocessors.

Security:

Caption Pro enforces a password complexity standard, and encrypts all user data at rest using industry standard encryption.

Your privacy rights and choices:

We at Caption Pro Ltd are a GDPR compliant data processor following best practices, so that we may adhere to our legal obligations with regard to handling personal data.

We would like to make sure you are aware of all of your data protection rights. Every user is entitled to the following:

- **The right to access** – You have the right to request us for copies of your personal data. We may charge you a small fee for this service.
- **The right to rectification** – You have the right to request that we correct any information you believe is inaccurate. You also have the right to request that we complete the information that you believe is incomplete.
- **The right to erasure** – You have the right to request that we erase your personal data, under certain conditions.
- **The right to restrict processing** – You have the right to request that we restrict the processing of your personal data, under certain conditions.
- **The right to object to processing** – You have the right to object to our processing of your personal data, under certain conditions.
- **The right to data portability** – You have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.

You can find more information about the conditions of these rights here (<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>).

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at the email provided at the bottom of this document.

If an image of you is uploaded by one of our users, your facial information may be sent to our service provider and securely processed. If you wish to have this information of yourself removed from our current user base, or from a particular user's database, then please contact us at the email address provided at the bottom of this document.

Furthermore, if your identity is being provided in the 'Celebrity Database' and you wish to have this information removed, please submit this request directly to AWS from the information provided on their website here

(<https://docs.aws.amazon.com/rekognition/latest/dg/celebrities.html>) or ask us to assist you with this via the contact information at the bottom of this page.

Cookies

We only use cookies that are essential to the functionality of the website, specifically, in order to track your logging in to our services. Other tracking and advertising cookies are not used.

Changes to our Privacy Policy

We may update this Privacy Policy in the future when making changes to our products or services or as laws or technology changes. We will take appropriate steps to inform you of changes to our Privacy Policy, consistent with the significance of the changes we make. If we make material updates to this Privacy Policy we will update the effective date at the top of the Privacy Policy.

Contact

If you have any questions, comments or concerns about this Privacy Policy or the way your personal data is being used, please contact us using the methods outlined below:

Email

privacy@caption-pro.com

Post

The Data Protection Officer
Caption Pro Ltd
4th Floor
Silverstream House
45 Fitzroy Street
Fitzrovia
London
W1T 6EB