



APPLICATION PRIVACY POLICY FOR RUNBOOK MANAGEMENT

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1. INTRODUCTION TO THE POLICY

At ICEFLO Limited, we are committed to protecting the privacy and security of our users. This Privacy Policy outlines how we collect, use, share, and safeguard your personal data when using our native application, Runbook Management (RBM), which is published on the ServiceNow Store. This policy is designed to inform you about our data handling practices in compliance with applicable data protection laws, including the UK GDPR, EU GDPR, and US privacy regulations (e.g., CCPA).

By using Runbook Management (RBM), you agree to the terms of this Privacy Policy.

2. DATA COLLECTION

Runbook Management (RBM) may collect the following types of data during its use:

- **User Data:** Name, email address, job title, and other profile information provided through the ServiceNow platform.
- **System Data:** Information related to system logs, error reports, and application usage metrics.
- **Transaction Data:** If applicable, information related to the interactions and transactions made via the application (e.g., form submissions, approvals, etc.).

We collect this data only as necessary to ensure the functionality and performance of Runbook Management (RBM).

3. DATA USAGE

The data collected is used for the following purposes:

- **Application functionality:** To deliver the core features of the application, including automation, workflow optimization, and user management.
- **Customer Support:** To provide customer support, troubleshooting, and product updates.
- **Analytics:** To analyse usage patterns and improve the application's performance and features.
- **Compliance and Security:** To ensure compliance with legal obligations and maintain the security of the application and ServiceNow environment.

4. DATA SHARING

We do not sell or rent your personal data to third parties. However, data may be shared under the following circumstances:

- **ServiceNow Platform:** As a native application, all data processed by Runbook Management (RBM) resides within the ServiceNow platform. Data may be shared with ServiceNow if required for troubleshooting or support purposes.
- **Third-Party Service Providers:** We may share data with third-party vendors or service providers to deliver extended business functionality via integrations with services that extend beyond the ServiceNow platform e.g. Atlassian Jira. In such cases, we ensure that Customer ServiceNow Admins are responsible for configuring these integrations including providing the required credentials.
- **Export:** We support the exporting of data from Runbook Management to industry standard file formats such as CSV and XLS. Data exported in this manner is no longer governed by this application privacy policy and the responsibility for data sharing and associated controls lies with the Customer.
- **Legal Requirements:** We may disclose data if required by law, such as to comply with a subpoena or similar legal process, or to protect our rights and the rights of others.

5. DATA STORAGE AND TRANSFER

We do not control where your data is stored. This is governed by your legal agreement with ServiceNow Inc. for the platform services that they provide.

- **ServiceNow Data Residency:** As a native application on the ServiceNow platform, most of your data remains within ServiceNow's data centres. ServiceNow's data centres may be located globally, including within the UK, EU, or the US, depending on the region in which your ServiceNow instance is hosted.
- **External Data Transfer:** In some cases, data may be transferred outside of the ServiceNow platform to deliver extended business functionality via integrations. When this happens, we implement adequate safeguards, such as authentication and encryption, to protect your data and ensure compliance with international data protection standards.
- **Data Retention:** We retain your data only for as long as necessary to fulfil the purposes outlined in this policy or as required by law.

6. DATA SECURITY

We are committed to ensuring the security of your data and use a variety of technical and organizational measures to protect it from unauthorized access, loss, or misuse. These measures include:

- **Encryption:** Data is encrypted both in transit and at rest where applicable.
- **Access Controls:** Strict access controls are in place to limit access to authorized personnel only.
- **Monitoring:** We actively monitor and audit access to data and the performance of the application to ensure it remains secure.

7. DATA SUBJECT RIGHTS

Depending on your jurisdiction, you may have the following rights under applicable data protection laws:

- **Access:** The right to request access to your personal data that we hold.
- **Correction:** The right to correct any inaccuracies in your data.
- **Deletion:** The right to request deletion of your personal data, subject to certain legal or contractual obligations.
- **Restriction:** The right to restrict processing of your data in certain circumstances.
- **Data Portability:** The right to request a copy of your data in a structured, machine-readable format.
- **Objection:** The right to object to the processing of your data under specific conditions.

To exercise any of these rights, please contact us at legals@iceflo.com

8. INTERNATIONAL TRANSFERS

If your data is transferred outside of the UK, EU, or US, we will ensure that appropriate safeguards are in place to protect your data, including:

- **Standard Contractual Clauses (SCCs)** as approved by the European Commission or the UK Information Commissioner's Office (ICO).
- **Binding Corporate Rules (BCRs)**, where applicable.
- **Other legally recognized mechanisms** for ensuring that data transfers comply with relevant privacy laws.

9. CHANGES TO THIS PRIVACY POLICY

We may update this Application Privacy Policy from time to time to reflect changes in our data handling practices or applicable laws. Any updates will be posted in the Runbook Management (RBM) documentation and, where appropriate, notified to users.

10. CONTACT US

If you have any questions or concerns about this Privacy Policy or how your data is handled, please contact us at:

- **Email:** legals@iceflo.com
- **Postal Address:** ICEFLO Limited, St Dunstons House, High Street, Melrose, United Kingdom, TD6 9RU

This Application Privacy Policy ensures transparency in how we handle your data when using Runbook Management (RBM). We take privacy seriously and comply with all relevant UK, EU, and US data protection regulations to safeguard your personal information.

11. DOCUMENT CONTROL

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