



United Motion Ideas (UMI) Data protection policy

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1 Introduction

The Data Protection Policy of United Motion Ideas is to protect the personal data of those various stakeholders connected to the organisation, and is created in accordance to the European Union's General Data Protection Regulation (GDPR), which applies to all members of the EU and EEA from May 25, 2018 onwards, replacing the EU directive 95/46.

1.1 Definition of data

In its everyday business operations United Motion Ideas makes use of a variety of data about identifiable individuals ('natural persons'), including data about:

- Current, past and prospective clients
- Current, past and prospective domain experts (called professionals)
- Users of the UMI application
- Users of the UMI community
- Other relevant stakeholders

In collecting and using this data, the organisation is subject to a variety of legislation controlling how such activities may be carried out and the safeguards that must be put in place to protect it.

The purpose of this policy is to set out the relevant legislation and to describe the steps United Motion Ideas is taking to ensure that it complies with it.

This control applies to all systems, people and processes that constitute the organisation's information systems, including board members, directors, employees, suppliers and other third parties who have an access to the United Motion Ideas' systems.

1.2 Scope

This policy refers to all parties (employees, job candidates, customers, suppliers etc.) who provide any amount of information to us.

1.2.1 Who is covered under the Data Protection Policy?

Employees of our company and its subsidiaries must follow this policy. Contractors, consultants, partners and any other external entity are also covered. Generally, our policy refers to anyone we collaborate with or acts on our behalf and may need occasional access to data.



2 Privacy and Personal Data Protection Policy

2.1 The General Data Protection Regulation

The General Data Protection Regulation (GDPR) is one of the most significant pieces of legislation affecting the way that United Motion Ideas carries out its information processing activities.

Significant fines are applicable if a breach is deemed to have occurred under the GDPR, which is designed to protect the personal data of citizens of the European Union. United Motion Ideas' policy is to ensure the compliance with the GDPR and other relevant legislation. The information related to this policy should be therefore clear and demonstrable at all times.

2.2 Definitions

The most fundamental GDPR definitions with respect to this policy are as follows:

“Personal data” is defined as any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

“processing” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

“profiling” means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person’s performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;

“pseudonymisation” means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is



subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person;

“recipient” means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

2.3 Policy elements

As part of our operations, we need to obtain and process information. This information includes any offline or online data that makes a person identifiable such as names, email addresses, country of residence, the company they work for and the job name.

Except for the email, our company collects this information using publicly available information on the web. The email address is reconstructed by our algorithms using the name and the company name.

2.4 Rights of the Individual

The data subject also has rights under the GDPR. These consist of:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling.

Each of these rights are supported by appropriate procedures within United Motion Ideas that allow the required action to be taken within the timescales stated in the following table.

Data Subject Request	Timescale
The right to be informed	Within one month after the data have been collected

The right of access	One month
The right to rectification	One month
The right to erasure	72 hours
The right to restrict processing	24 hours
The right to data portability	One month
The right to object	Immediately
Rights in relation to automated decision making and profiling.	72 hours

Table 1: Times for data subject requests

2.5 Lawfulness of Processing

All processing of personal data must meet one of the six lawful bases defined in Article 6(2) of the GDPR:

1. Where we have the consent of the data subject
2. Where it is in our legitimate interests and this is not overridden by the rights and freedoms of the data subject.
3. Where necessary to meet a legal obligation.
4. Where necessary to fulfil a contract, or pre-contractual obligations.
5. Where we are protecting someone’s vital interests.
6. Where we are fulfilling a public task, or acting under official authority.

Any special category data (sensitive types of personal data as defined in Article 9(1) of the GDPR) must further be processed only in the line with one of the conditions specified in Article 9(2).

To ensure our obligations under information law are met, the processing of personal information must comply with the principles of the GDPR. Accordingly, personal data will be:

1. Processed lawfully, fairly and in a transparent manner in relation to the data subject.
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (“data minimization”).



4. Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purpose for which they are processed, are erased or rectified according to the times presented in Table 1.
5. Kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (“integrity and confidentiality”).

2.6 Privacy by Design

United Motion Ideas has adopted the principle of privacy by design and will ensure that the definition and planning of all new or significantly changed systems that collect or process personal data will be subject to due consideration of privacy issues, including the completion of one or more data protection impact assessments.

The data protection impact assessment will include:

- Consideration of how personal data will be processed and for what purposes
- Assessment of whether the proposed processing of personal data is both necessary and proportionate to the purpose(s)
- Assessment of the risks to individuals in processing the personal data
- What controls are necessary to address the identified risks and demonstrate compliance with legislation

Use of techniques such as data minimization and pseudonymisation will be considered where applicable and appropriate.

2.7 Data Protection Officer

A defined role of Data Protection Officer (DPO) is required under the GDPR if an organisation is a public authority, if it performs large scale monitoring or if it processes particularly sensitive types of data on a large scale. The DPO is required to have an appropriate level of knowledge and can either be an in-house resource or outsourced to an appropriate service provider.

Based on these criteria, United Motion Ideas has appointed our CTO as a Data Protection Officer. He can be contacted to exercise the rights stated in 2.4, for any GDPR or privacy related matter at [dpo \[at\] umi.us](mailto:dpo@umi.us).



2.8 Breach Notification

It is United Motion Ideas' policy to be fair and proportionate when considering the actions to be taken to inform affected parties regarding breaches of personal data. In line with the GDPR, where a breach is known to have occurred which is likely to result in a risk to the rights and freedoms of individuals, the relevant supervisory authority will be informed within 72 hours as well the users being impacted by the breach.