

This is Instrumental Group’s Privacy Policy. Please read it carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

Summary:

We primarily use your data to expand your capabilities inside the HubSpot CRM; to promote the service; and for the purposes of running our business. More detail in the “How we use your Information” section below.

We delete your data when it is no longer needed for these things. More detail in the “How we use your Information” section below.

We’ll share your personal data to our customer whose subscription gives you access to Instrumental Group (typically, your employer). That organization is referred to in this policy as the “HubSpot Account Owner”. Generally, we do not otherwise give your information for anyone else to use for their own purposes, but we use a number of external service providers to power our operations, including HubSpot.

We are happy to answer your questions about any of this – email us at [apps@instrumental.net](mailto:apps@instrumental.net).

This policy is for customers and users of the Instrumental Group service, and also individuals registered as HubSpot users of the HubSpot Account Owner.

If you believe that one of our customers is using Instrumental Group to process your personal data, please contact them direct with any questions about that processing. To the extent that any personal data is stored or processed by our customers using Instrumental Group, we act as a ‘data processor’ for our customers, who are the ‘data controller’ of any personal data processed using the Instrumental Group service.

Note to Residents of the European Union: In order to comply with the requirements of the European General Data Protection Regulation (GDPR) for our European users, this Privacy Policy outlines the legal basis on which we process your Personal Data and provides other information required by the GDPR.

## Who we are

Instrumental Group collects, uses and is responsible for certain personal information about you. When we do so we are regulated under the [General Data Protection Regulation](#) and we are responsible as ‘controller’ of that personal information for the purposes of those laws.

## The personal information we collect from you and others

We collect the following personal information when you provide it to us.

- Usage Data: Details of your usage of Instrumental Group widgets.
- Marketing and Communication Preferences: Your preferences as to whether we contact you with promotional information about Instrumental Group. We use this to make sure we don’t send you anything you have asked not to receive.
- Communications: We will record the fact that you have contacted us (or we have contacted you) and may retain the content of the communication, together with your contact details and our responses.

We may obtain (through an intermediary integrated with HubSpot called [Drift](#)) your HubSpot email address. If you are the individual whose details are recorded by HubSpot as HubSpot’s main account contact for the HubSpot Account Owner, we will obtain from HubSpot your email address, and confirmation of your status as the account contact.

## How we use your Information

This section tells you what uses we make of your information.

We use your information in the following ways:

To allow us to operate the Instrumental Group service, and the business operations we engage in to that end, including facilitating your use of any Instrumental Group widgets , and supporting any operational or technical queries you may raise.

To manage the HubSpot Account Owner’s subscription with us, which will include notifying you about limits on the subscription and changes to our terms.

Notifying you of changes to our privacy policy.

To use data analytics to improve our website, products/services, marketing, and user relationships and experiences.

To analyze our revenues against our internal revenue measurements.

To administer and protect our business.

To deliver relevant website content and promotional emails we send to you and measure or understand the effectiveness of them.

We use your Marketing and Communication Preferences to make sure we don’t send you anything you have asked not to receive.

We will also use your information in the event that we need to enforce our terms of service, or to help us defend any legal claims against us.

We may also need to process your data for compliance with a legal obligation to which we are subject.

If you give us your consent, we may publish your feedback about Instrumental Group on our website or marketing material.

## The Legal Basis on which we Process Your Information

The GDPR requires all organizations that process personal data to have a “Lawful Basis” for doing so. The Lawful Bases on which we process your personal data are as follows:

**Legitimate Interest:** means the legitimate interest of us, HubSpot, and the HubSpot Account Owner, in our conducting and managing our business to enable us to give you the best service and the best and most secure Instrumental Group experience. The legitimate interests include provision of services that we are contractually obliged by the HubSpot Account owner to deliver to you; to provide and improve Services; to administer our relationship with you and our business; for marketing; and in order to exercise our rights and responsibilities. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us at [apps@instrumental.net](mailto:apps@instrumental.net).

**Performance of Contract:** means processing your data where it is necessary for the performance of a contract between us and you as our HubSpot Account Owner customer, or to take steps at your request before entering into such a contract.

**Legal Obligation:** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

## Use of cookies

A cookie is a small text file which is placed onto your computer (or other electronic device) when you use our website. We use cookies on Instrumental Group web pages.

## HubSpot

Instrumental Group service is integrated with HubSpot. We receive certain information from HubSpot as set out above. We do not share any personal information about you with HubSpot.

## Who we share your personal information with.

We use the following service providers to help us process your personal information:

- Our hosting partner, Amazon Web Services. See <https://aws.amazon.com/privacy/> for more details.
- We use **Drift**, a messaging service integrated with HubSpot, to communicate with you, for example to help process requests for technical support.
- If you are a billing contact at the HubSpot Account Owner, **Stripe** (our payment processor) may process your payment card details.
- We use Bold Commerce ([www.boldcommerce.com](http://www.boldcommerce.com)) to help notify users when a credit card (stored securely in our payments provider Stripe) needs to be renewed or updated. We also use Bold Commerce to assist our internal revenue measurements. To learn about the privacy practices of Bold Commerce, please see <https://boldcommerce.com/privacy>.

Additionally, we may disclose your data to third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data.

We may share your information with any parent, subsidiary or sister Instrumental Group companies, to provide the Instrumental Group service and for internal administration purposes.

We may also share personal data where we consider it is required as follows:

- to comply with applicable laws, regulations or any judicial order
- to enforce our contractual rights under our terms of service or otherwise
- to protect the security, rights, privacy, safety and property of Instrumental Group, of you, or of others.

## How long your personal information will be kept

We will retain your personal data for a period of up to 12 months from the end of our relationship with the HubSpot Account Owner.

## Your rights

Under the [General Data Protection Regulation](#) you have a number of important rights free of charge. In summary, those include rights to:

- access to your personal information and to certain other supplementary information that this Privacy Policy is already designed to address
- require us to correct any mistakes in your information which we hold
- require the erasure of personal information concerning you in certain situations
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations

- object at any time to processing of personal information concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal information
- otherwise restrict our processing of your personal information in certain circumstances

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- email us at [apps@instrumental.net](mailto:apps@instrumental.net),
- let us have enough information to identify you, and
- let us know the information to which your request relates, including any account or reference numbers, if you have them.

If you would like to unsubscribe from any promotional material we send you, you can also click on the 'unsubscribe' button at the bottom of the email. You can also email [apps@instrumental.net](mailto:apps@instrumental.net) directly for this request.

## Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorized way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit [www.getsafeonline.org](http://www.getsafeonline.org). Get Safe Online is supported by HM Government and leading businesses.

## How to complain

We hope that we can resolve any query or concern you raise about our use of your information.

The [General Data Protection Regulation](#) also gives you the right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

## Changes to this privacy notice

This privacy notice was last updated on 01/24/2020.

## How to contact us

Please contact us if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact us please send an email to [apps@instrumental.net](mailto:apps@instrumental.net), call us at +1 303-945-4341 or write to us at 2081 Youngfield Street, Golden, Colorado 80401.

