



## Maistro Privacy Notice

Last Updated:

### ABOUT THIS DOCUMENT

This privacy notice (**Notice**) explains how Next 15 Group Plc and its associated entities and subsidiaries (**we, our, us, Next 15**) collects, uses and shares ("**processes**") the personal data of staff (including workers such as casual workers), prospective staff (i.e. job applicants) in relation to the use of Maistro.

### DATA CONTROLLER AND DATA PROTECTION OFFICER DETAILS

For the purposes of any applicable data protection laws including but not limited to the Data Protection Act 2018 (DPA) the UK General Data Protection Regulation (UK GDPR) and General Data Protection Regulation EU 2016/679 (EU GDPR), Next 15 is the data controller of your personal data. Next 15 has appointed a Data Protection Officer, who can be contacted via email at [dpo-hub@next15.com](mailto:dpo-hub@next15.com)

### HOW WE COLLECT YOUR INFORMATION

We collect your personal data in a number of ways including:

- When you sign in and use Maistro within an internet browser.
- If you choose to enter any personally identifiable information about yourself or others.
- If you upload any documents that contain personal information about yourself or others.

Before using the Maistro please see our [Next 15 AI Guardrails](#).

### THE TYPES OF INFORMATION WE COLLECT

To provide this service to you Next 15 will process the following categories of personal data:

- **User ID Information:** When you operate an instance of Maistro within an internet browser we collect information associated with you as a user such as generating a user ID to uniquely identify your instance. This user ID will be linked to your name and work email address.
- **User Content:** When you use Maistro we process the personal information that is included in the input, file uploads or feedback that you provide.
- **Other Information you provide:** We collect other information that you may provide to us, such as when you participate in any surveys or when providing feedback on Maistro so that we may improve it for your use.
- **Log Data:** Information that your browser or device automatically sends when you use Maistro. Log data includes your Internet Protocol address, browser type and settings, the date and time of your request, and how you interact with Maistro.
- **Usage Data:** We may automatically collect information about your use of Maistro, such as the types of content that you view or engage with, the features you use and the actions you take, as well as your time zone, country, the dates and times of access, user agent and version, type of computer or mobile device, and your computer connection.
- **Device Information:** Includes name of the device, operating system, device identifiers, and browser you are using. Information collected may depend on the type of device you use and its settings.
- **Cookies:** We use cookies to operate and administer Maistro. A "cookie" is a piece of information sent to your browser by a website you visit. You can set your browser to accept all cookies, to reject all cookies, or to notify you whenever a cookie is offered so that you can decide each time whether to accept it. However, refusing a cookie may in some cases preclude you from using, or negatively affect the display or function of, a website or certain areas or features of a website. For more details on cookies, please visit [All About Cookies](#).

# NEXT15

- **Analytics:** We may use a variety of online analytics products that use cookies to help us analyze how users use our Services and enhance your experience when you use the Services.

As a user, you should not enter any special categories data into Maistro. Special categories data is defined as data concerning health, religious beliefs, racial or ethnic origin, sexual orientation or criminal convictions.

## HOW WE USE YOUR PERSONAL DATA

Subject to applicable law, your personal data may be processed by us for the following purposes:

- To store session data and allow users to save and return to conversations in future.
- To provide, administer, maintain and/or analyse the use of Maistro.
- To improve the functionality of Maistro and conduct research.
- To develop new programs and services.
- To prevent fraud, criminal activity, or misuse of Maistro, and to protect the security of our IT systems, architecture, and networks, and
- To comply with legal obligations and legal process and to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or other third parties.

We may aggregate or de-identify Personal Information so that it may no longer be used to identify you and use such information to analyse the effectiveness of Maistro, to improve and add features, to conduct research and for other similar purposes. In addition, from time to time, we may analyse the general behaviour and characteristics of users and analyse aggregated information like general user statistics. We may collect aggregated information through Maistro, through cookies, and through other means described in this Notice. We will maintain and use de-identified information in anonymous or de-identified form and we will not attempt to reidentify the information unless required by law.

## LEGAL BASIS FOR PROCESSING YOUR DATA

Every time we process personal data we must have a legal basis upon which to rely.

We will only collect, use and share your personal information where we are satisfied that one or more of the following legal bases apply:

### Legitimate Interest

The processing is necessary for the legitimate interests pursued by Next 15 or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require the protection of personal information. When we use legitimate interest as our legal basis for processing your information we conduct an assessment in order to risk assess our activities. Our legitimate interests include our interests in running Next 15 in a professional sustainable manner, in accordance with all relevant legal and regulatory requirements and in line with industry best practice.

### Consent

If you enter personal information into Maistro you are giving N15 your consent to process that information. If you are entering information of a third party you must obtain their consent before entering such information into Maistro.

## DATA SHARING AND THIRD PARTY WEBSITES.



For the purposes set out in this notice, we will not share your personal information with any person or entity out with Next 15. The only exception to this is when your data is transferred to a technology service provider in order to enable Maistro to function.

Maistro links to other AI services via secure API connectors. We have designed the tool this way so that the data entered cannot be used to train their models or for any other business purpose. Please note that your searches may contain links to other websites that are not operated or controlled by Next 15. The information that you share with Third Party Sites will be governed by the specific privacy notices and terms of service surfaced by that Third Party Sites and not by this Privacy Notice. By providing these links we do not imply that we endorse or have reviewed these sites. Please contact the Third Party Sites directly for information on their privacy practices and policies.

## **AUTOMATED DECISION MAKING AND PROFILING**

Your data will not be subject to any automated decision making or profiling beyond the activities that are set out within this notice, unless you insert any personal information into the tool through your use of it.

## **INTERNATIONAL DATA TRANSFERS**

There may be circumstances where Next 15 shares or discloses data outside the United Kingdom (UK) or the European Economic Area (EEA) in relation to the provision of IT infrastructure or other professional services.

In these circumstances, your personal data will only be transferred on one of the following bases:

- the transfer is subject to one or more of the "appropriate safeguards" for international transfers prescribed by applicable law (e.g. data transfer assessments and standard contractual clauses as adopted by the European Commission and UK Government respectively);
- a European Commission decision provides that the country or territory to which the transfer is made ensures an adequate level of protection; or
- there exists another situation where the transfer is permitted under applicable law (for example, where we have your explicit consent).

## **DATA RETENTION**

We will retain your Personal Data for as long as is reasonably necessary for the purposes explained in this Notice. In some circumstances, we may retain your Personal Data for longer periods of time, for instance where we are required to do so in accordance with legal, regulatory, tax or accounting requirements or so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your relationship with us. Where your Personal Data is no longer required we will ensure it is either securely deleted or stored in a way that no longer identifies you.

Your chat history will be retained for a period of 30 days from the point at which you first entered the information into Maistro or from the point at which you last interacted with that topic. Any file uploaded will be held for a period of 8 hours from the point at which you first uploaded the information or from the point at which you last queries the content of that document.

If you would like further details regarding our records retention, please contact the Data Protection and Privacy Office at [dpo-hub@next15.com](mailto:dpo-hub@next15.com)

## **NEXT 15 and CCPA/CPRA COMPLIANCE**



The California Consumer Privacy Act (CCPA) as amended by the California Consumer Privacy Act of (CPR) gives consumers more control over the personal information that businesses collect about them. The following table provides additional information about the categories of Personal Information we collect and how we disclose that information.

Category of Personal Information	Disclosure of Personal Information
Identifiers, such as your session ID/User ID, IP address, and other device identifiers	We may disclose this information to our affiliates, vendors and service providers to process in accordance with our instructions; to law enforcement and other third parties for the legal reasons described above; to parties involved in Transactions; to corporate administrators of enterprise or team accounts; and to other users and third parties you choose to share it with.
Network Activity Information, such as Content and how you interact with our Services	We may disclose this information to our affiliates, vendors and service providers to process in accordance with our instructions; to law enforcement and other third parties for the legal reasons described above; to parties involved in Transactions; and to other users and third parties you choose to share it with.

## YOUR RIGHTS

Under applicable data protection legislation, you have the following rights:

to obtain access to, and copies of, the personal data we hold about you.

- to require that we cease processing your personal data if the processing is causing you damage or distress;
- to require us not to send you marketing communications;
- to request that we erase your personal data;
- to request that we restrict our data processing activities in relation to your personal data;
- to receive from us the personal data we hold about you, which you have provided to us, in a reasonable format specified by you, including for the purpose of transmitting that personal data to another data controller; and
- to require us to correct the personal data we hold about you if it is incorrect.

**Please note that the above rights are not absolute, and requests may be refused where exceptions apply.**

If you have any questions about these rights or how your personal data is used by us, you should contact the Group Data Protection Officer whose details are set out above.

## CONTACT AND COMPLAINTS

Data protection regulators recommend that you seek to resolve any issues with the data controller before any referral is made to them. If you have any queries about this privacy notice or how we process your personal data, or if you wish to exercise any of your rights, you may contact your line manager or the Data Protection Officer at [dpo-hub@next15.com](mailto:dpo-hub@next15.com) or in writing to:

FAO Data Protection Officer  
The Data Protection and Privacy Office  
60 Great Portland Street,



London,  
W1W 7RT

If following such referral you are still not satisfied with how your personal data is used by Next 15 you can make a complaint to the Information Commissioner ([www.ico.org.uk](http://www.ico.org.uk)).

### **CHANGES TO THIS NOTICE**

Next 15 will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.