



IMPLICIT DATA PROCESSING STATEMENT

Implicit Outlook Integration for intelliflo office — UK GDPR

Updated: May 18, 2026

Purpose. This statement explains the personal data that Implicit Inc. (“Implicit”) processes in connection with the Implicit Outlook Integration for intelliflo office, the role Implicit plays under the UK GDPR, and the safeguards Implicit applies.

At a glance

Personal data received by Implicit	<p>Implicit processes and holds licensing-related data only:</p> <ul style="list-style-type: none">(a) At sign-up from intelliflo: region (UK/AU), company name, user name, email address, intelliflo office tenant/user IDs.(b) During use, from the Implicit Software (periodic license verification): region, tenant/user IDs, Outlook email address, software version, install/update date and times, IP address.(c) Via the support form: name, company name, email (see Support data below).
Data NOT received by Implicit	<p>Clients, prospects, activities, portfolio, service cases/ plans / tasks, communication, email, personal information data (other than advisors’ licensing information specified above).</p> <p>Such data is processed locally on the end-users’ desktops between intelliflo office, Microsoft 365 and Outlook and is never transmitted to or stored by Implicit. By design, this also applies to support requests (see below).</p>
How data reaches Implicit	<ul style="list-style-type: none">(a) Sign-up data is transmitted to Implicit by intelliflo at the point of end-user sign-up on the intelliflo store.(b) Periodic license-verification data is transmitted by the Implicit Software running on the end-users’ desktops during normal use.(c) Support data is submitted directly by the advisor via the Implicit support form.
Implicit’s role	<p>Controller of all personal data described above:</p> <ul style="list-style-type: none">(a) For sign-up data, Implicit and intelliflo act as independent controllers.(b) For periodic license-verification data and support data, Implicit is the sole controller. Not a processor or sub-processor of the advisor firm in respect of any personal data.

Lawful basis	Performance of the end-user license agreement (Article 6(1)(b) UK GDPR) for license provisioning, verification and anti-piracy checks. Legitimate interests (Article 6(1)(f)) for providing support and operating the service. Consent (Article 6(1)(a)) for optional product/marketing emails. Transparency is provided by Implicit at sign-up and at install.
Hosting & transfers	Amazon Web Services. The Licensing Data is currently hosted in AWS-US region. The UK Addendum to the EU Standard Contractual Clauses applies as the international transfer mechanism.
Sub-processors	Amazon Web Services, Inc. (cloud hosting).
Retention	Duration of the end-user license plus a limited audit-and-dispute window thereafter.
Breach notification	Within 72 hours of becoming aware of a personal data breach affecting Licensing Data.
Contact	Email: privacy@implicitweb.com

Data Processing Agreement

A Data Processing Agreement under Article 28 UK GDPR is not required between Implicit and the advisor firm for the following reasons:

- a. The personal data that Implicit holds is not received from, or processed on behalf of, the advisor firm. Upon end-users' sign-up, data is shared with Implicit by intelliflo (as an independent controller). Periodic license-verification and support data are collected by Implicit directly from end-users.
- b. All other personal data that the advisor firm and its end-users handle — Clients, prospects, activities, portfolio, service cases/ plans / tasks, communication, email, personal information data (other than advisors' licensing information specified above) — is processed locally on end-users' desktops between intelliflo office, Microsoft 365 and Outlook, and is never transmitted to, accessed by or stored on Implicit's systems. Implicit therefore has no controller-to-processor relationship with the advisor firm in respect of any personal data, and Article 28 does not apply.

Support data

Implicit operates a support ticket submission for advisors. The form requires advisors to confirm they have not included personal data of clients or other third parties. Any incidental third-party data is redacted or deleted on receipt and not used; tickets are retained for a limited period then deleted. Implicit acts as an independent controller for the advisor's own contact details and ticket content; and is not a processor of the advisor firm in respect of support data.

Security measures summary

- Encryption in transit: HTTPS / TLS 1.2 or higher
- Encryption at rest: AES-256 (or equivalent) on Amazon AWS.
- Role-based access control for administrative access.
- Network segmentation, patching, logging and monitoring of the licensing infrastructure.
- Encrypted backups and documented disaster-recovery procedures.
- Confidentiality obligations and data-protection training for personnel.