



Government Data Request Policy

Last updated: 13 November 2023

This Government Data Request Policy describes how Staffbase (“we”, “us” or “our”) will respond to requests from law enforcement agencies or government authorities (collectively “Government Authority”) to disclose customer data that a customer has provided to us in relation to the Staffbase Services (“Data Disclosure Request”). This policy does not cover requests for information from our customers, users, or other third parties.

General principle on Data Disclosure Requests

As a general rule, Staffbase does not disclose customer data in response to a Data Disclosure Request, unless either:

- The disclosure is expressly permitted by the customer; or
- We are legally obliged to make the disclosure; or
- Taking into account the nature, context, purposes, and urgency of the Data Disclosure Request and the privacy rights and freedoms of any affected individuals, we determine in our sole discretion that there is an emergency involving imminent risk of death or serious harm to any person, or serious harm to an organization, or governmental entity.

Request Procedure

Any Data Disclosure Request must be sent to legal@staffbase.com. All requests will be narrowly construed by Staffbase. Where appropriate, we will seek to narrow any request to only the specific data that is required to respond.

Consultation of Data Protection Authorities

If the requesting Government Authority is in a country that does not provide an adequate level of protection for personal data in accordance with applicable data protection laws, and it is reasonably likely that the customer data includes significant amounts of personal data, we may consult with competent data protection authorities prior to disclosing any customer data, unless legally prohibited or where an imminent risk of death or serious harm exists.

Notice to Customer

We will notify customers of any Data Disclosure Request before disclosing their customer data so that the customer may seek legal remedies, unless prohibited by applicable law. Our Legal Team will review the request to ensure there is a valid legal basis for the disclosure. If Staffbase is legally prohibited from notifying the customer prior to disclosure, Staffbase will take reasonable steps to notify the customer of the request after the nondisclosure requirement expires. If Staffbase receives a request that is subject to an indefinite nondisclosure requirement, Staffbase may challenge the non-disclosure requirement in court.

Transparency Reports

The table below sets out the number of Data Disclosure Requests that Staffbase receives annually.

Year	Type of request	Number of Data Disclosure Requests received	Number of times data has been disclosed
2023	--	0	0
2022	--	0	0
2021	--	0	0
2020	--	0	0