
PRIVACY NOTICE

BACKGROUND:

Novatia plc understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our customers and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. Information About Us

Novatia plc.

Public Limited Company registered in England under company number 04656812.

Registered address: 1 Winnall Valley Road, Winchester, Hants, SO23 0LD.

VAT number: 807 1669 23

2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

4. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us] to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 11 to find out more.

- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about **our** use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

5. What Personal Data Do You Collect?

We may collect some or all of the following personal data (this may vary according to your relationship with **us**):

- Name;
- Business Address;
- Email address;
- Business Telephone numbers;
- Business name;
- Job title;
- Profession;
- Payment information;

6. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for **our** performance of a contract with you, because you have consented to **our** use of your personal data, or because it is in **our** legitimate business interests to use it. Your personal data may be used for one of the following purposes:

- Providing and managing your account.
- Supplying **our** products **AND/OR** services to you. Your personal details are required in order for **us** to enter into a contract with you.
- Personalising and tailoring **our** products **AND/OR** services for you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email that you have opted-in to (you may

unsubscribe or opt-out at any time by accessing the Subscription Preferences on the Novatia web site).

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email **AND/OR** telephone **AND/OR** post with information, news, and offers on **our** products **AND/OR** services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with **our** obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- Where the information relates to the delivery of a contract, we will keep the information for the duration of the contract and then for a period of seven year from the termination of the contract;
- For marketing related information, we will keep your records on file for a maximum of two years after the most recent contact.

8. How and Where Do You Store or Transfer My Personal Data?

We will generally store or transfer your personal data within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the GDPR or to equivalent standards by law.

Where **we** share your data with external third parties, as detailed below in Part 9, that are based outside of the EEA, the following safeguard are applied to such transfers:

Where we transfer your data to a third party based in the US, this may be protected if they are part of the EU-US Privacy Shield. This requires that third party to provide data protection to standards similar levels of data protection to those in Europe. More information is available from the [European Commission](#).

The security of your personal data is essential to **us**, and to protect your data, we take a number of important measures, including the following:

- Following our ISO27001 processes to maintain the integrity and security of your data when in transit and at rest.
- Using SSL encryption or sFTP to collect and transfer data.

9. Do You Share My Personal Data?

We may sometimes contract with the following third parties to supply products **AND/OR** services to you on **our** behalf. These may include payment processing, delivery, and marketing. In some cases, those third parties may require access to some or all of your personal data that we hold.

- Chaser Technologies Limited for the purposes of invoice management. Transferred data is stored within the European Economic Area (EEA).

- Hubspot for the purposes of Marketing systems. Data is stored with the European Economic Area (EEA) and within the US where is covered by EU-US Privacy Shield Framework.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, **our** obligations, and the third party's obligations under the law, as described above in Part 8.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR, as explained above in Part 8.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask **us** for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover **our** administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of **our** progress.

11. **How Do I Contact You?**

To contact **us** about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of The Data Protection officer):

Email address: psn@novatia.com.

Telephone number: 01962 832632.

Postal Address: 1 Winnall Valley Road, Winchester, Hampshire, SO23 0LD.

12. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change **our** business in a way that affects personal data protection.

Any changes will be made available via the Novatia plc website.