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Please take the time to read the following information carefully so that you fully understand our views and practices regarding your personal data and how we will use it. You must be over 18 years old to use our Site.

### WHO DOES THIS PRIVACY POLICY APPLY TO?

We understand that your privacy is important to you and that you care about how your personal data is used and shared. We respect and value the privacy of everyone who we collect personal data about and we will only collect and use personal data in ways that are described in this privacy policy, and in a manner that is consistent with our obligations and your rights under applicable data protection laws.

This privacy policy applies to:

- people who simply visit <u>advice-cloud.co.uk</u> (our **Site**); or our sister site <u>advice-gov.co.uk</u>
- people who purchase our products and/or services via our Site (including people who create an account to enable them to access and/or use certain areas or features of our Site, and/or register to attend any of our events and/or webinars) or offline (whether or not a fee is payable);
- people who supply products and/or services to us (including people who
  register to attend any of our events and/or webinars via our Site) (whether or
  not a fee is payable);
- people who make enquiries about our products and/or services, or request information or a quote, via our Site or offline; and
- people who complete a survey or give us feedback.

We do not collect any personal data about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, or genetic or biometric data.

This Site is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your personal data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

### **WHO WE ARE**

You can read about who we are and what we do here.

For the purposes of the UK Data Protection Act 2018 and, to the extent relevant, the General Data Protection Regulation ((EU) 2016/679) (**DP Laws**), Advice Cloud Limited is the controller and responsible for your personal data. We are registered as a controller with the Information Commissioner's Office (**ICO**) (our registration number is ZA356010). If you have any questions regarding this privacy policy or believe we have breached any DP Laws, please contact us at <a href="mailto:privacy@advice-cloud.co.uk">privacy@advice-cloud.co.uk</a> or write to us at Platf9rm, Hove Town Hall, Church Road, Hove, BN3 2AF.

You have the right to make a complaint at any time to a data protection authority about our collection and use of your personal data. For more information, please contact your local data protection authority. The ICO's contact details can be found at <a href="www.ico.org.uk">www.ico.org.uk</a> and the contact details for data protection authorities in the EEA are available <a href="here">here</a>. We would, however, appreciate the chance to deal with your concerns before you approach a data protection authority so please contact us in the first instance.

### **ABOUT THIS POLICY**

This privacy policy, together with our <u>Terms and Conditions</u> (and any other documents referred to in it) (this **Policy**) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. By using our Site, you accept the practices described in this Policy.

This Policy is effective on and from 31st May 2018. We may amend this Policy at any time, and whenever we do so we will notify you by posting a revised version on our Site or emailing you. Please review this Policy each time you visit our Site as it may have been updated since your last visit.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us (see *Who we are*). If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

This Policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy <a href="https://example.com/here.c

- Visitors to our Site
- Purchasing our products and/or services
- Supplying to us
- Making enquiries and requesting other information from us
- Completing a survey or giving us feedback
- International Transfers
- Your rights
- How we protect your personal data

- Marketing
- Links to third party websites

### **VISITORS TO OUR SITE**

Personal data we collect: With regard to each of your visits to our Site, we will automatically collect:

- technical information, including the Internet Protocol (IP) address used to facilitate your connection to the Internet, browser type and version, time zone setting, browser plug-in types and versions and hardware information; and
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Site (including date and time), services, products, publications and articles you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page and the site you exit to.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate information about how you use our Site to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Policy.

Cookies: Our Site uses cookies to distinguish you from other users of our Site. This helps us to provide you with a good experience when you browse our Site and also allows us to improve our Site. Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of our Site and to compile statistical reports on website activity. You can read more about how we use cookies in our Cookie Policy. You can enable or disable cookies by modifying the settings using the cookie preference button and in your browser. You can find out how to do this, and find more information on cookies, at <a href="https://www.allaboutcookies.org">www.allaboutcookies.org</a>.

*Using your personal data:* We will use this information for the following legitimate interests (whether ours or a third party's):

- to improve our Site and ensure that content is presented in the most effective manner for you and for your device(s);
- to maintain our Site and keep it safe and secure;
- to protect the rights, property or safety of Advice Cloud, our customers, suppliers, contacts or others (we will also use your information where we are required by law to do so);
- for internal operations (including data analysis, troubleshooting, testing, system maintenance, support, reporting and hosting of data);
- to measure or understand the effectiveness of our Site and/or any marketing we serve to you and others, and to deliver relevant marketing to you; and/or
- to deal with any issues you have reported with our Site.

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 (see **Who we are**).

Sharing your personal data: We will only share personal data with third parties in the following instances:

- our employees, contractors, consultants and freelancers (but their use shall be limited to the performance of their duties and in line with the reason for processing);
- when information about you is processed by our third-party IT support provider (acting as a processor), for the purposes of providing IT support to us:
- with analytics and search engine providers (acting as processors) that assist us in the improvement and optimisation of our Site;
- when information about you is processed by our CRM tools which are owned, hosted and supported by third parties (acting as processors);
- if we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- when information about you is processed by our accounting software which is owned, hosted and supported by third parties (acting as processors); and/or
- our third party website hosting supplier (acting as a processor), to enable them to maintain and host our Site.
- when information about you is shared with Marketing agencies who we engage from time to time to provide us with marketing and sales support.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Retaining your personal data: This information is kept for 26 months (to reflect Google Analytics retention period settings and to ensure we can conduct year on year comparisons) and will then be deleted automatically. However:

- if we are required by law to retain it for longer, we will retain it for the required period; and/or
- where the information is being used in connection with legal proceedings (including prospective legal proceedings) it will be retained for the duration of those legal (and any enforcement) proceedings.

Your rights: Please see Your rights.

## **PURCHASING OUR PRODUCTS AND/OR SERVICES**

Personal data we collect: If you contact us or we contact you (by phone, email or otherwise) in connection with your purchase of our products and/or services, we will hold your name, job title/profession, employer details, email address(es), phone number(es), location, your personal bank information if you pay for our products/services using your own credit or debit card, and demographic information (such as your preferences and interests) (including any other details that appear on your business card which you provide to us). If you create an account online via our Site, we will also collect profile data (including your username and password, purchases or orders made by you and your interests, training undertaken, preferences, feedback and survey responses) and your preferences in receiving marketing from us (including third party content, events and/or webinars we think might be of interest to you) and other communications.

In some instances, we may ask for information about criminal convictions of company directors to enable us to complete public sector questionnaires that ask for this information.

## We may also collect:

- information and documentation that we obtain about you and your business from publicly available information (e.g. your website, social media and Companies House) when we carry out research (this is to ensure that we understand you and your business);
- information you give us when you attend any of our events and/or webinars, whether hosted by us or a third party, (including when you register to provide feedback); and/or
- information about you from social media platforms including when you interact
  with us on those platforms or access our social media content (the information
  we may receive is governed by the privacy settings, policies, and/or
  procedures of the applicable social media platform, and we encourage you to
  review them).

We do not record calls.

*Using your personal data:* We will use this information for the following legitimate interests (whether ours or a third party's):

- to enable us to perform our contract with the company who is purchasing our products and/or services, or to take steps to enter into such contract;
- to provide and manage your online account which you set up to access and/or use certain areas or features of our Site;
- to keep you informed of tendering opportunities and updates to procurement processes;
- to process and deliver the company's order including managing payments, fees and charges, and collecting and recovering money owed to us;
- to manage our relationship with the company who is purchasing our products and/or services including notifying changes to our terms or this Policy,

- keeping our records updated and to study how customers use our products and/or services;
- the organisation of, and to follow up, events and/or webinars that you have registered to attend;
- notifying you about any other events, products and services and/or webinars we think you might be interested in;
- to send you marketing communications (see *Marketing*);
- to conduct market research that will help us better understand our target market and tailor our marketing communication;
- to make introductions to other relevant individuals (customers, suppliers or other contacts) where there is mutual benefit;
- to study preferences and/or known company challenges to inform our product development and offer you relevant services; and/or
- when information about you is shared with Marketing agencies who we engage from time to time to provide us with marketing and sales support

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 (see **Who we are**).

- our employees, contractors, consultants and freelancers (but their use shall be limited to the performance of their duties and in line with the reason for processing);
- when information about you is processed by our third-party IT support provider (acting as a processor), for the purposes of providing IT support to us:
- when information about you is processed by our CRM tools which are owned, hosted and supported by third parties (acting as processors);
- when information about you is processed by our accounting software which is owned, hosted and supported by third parties (acting as processors);
- our third party website hosting supplier (acting as a processor) to enable them to maintain and host our Site:
- various third parties (acting as processors) who provide tools and cloud solutions to enable our business to operate (including email, instant messaging, document management and file-sharing) (acting as processors);
- when information about you is shared with third parties who provide credit reference checks for us and/or who assist us to recover monies owed to us (acting as processors or joint controllers);
- with professional advisers (acting as processors or joint controllers) including lawyers, bankers, auditors and insurers based in the United Kingdom who provide legal, banking, accounting and insurance services;

- when information about you is shared HM Revenue & Customs, regulators and other authorities (acting as controllers or processors) who require reporting of processing activities in certain circumstances;
- if we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- when information about you is shared with third parties who help us to arrange and/or host events and/or webinars that you have registered to attend (acting as processors or controllers);
- with our telephony supplier (which would get to see phone numbers if we call you) and our broadband supplier (which could see email addresses (but not the content of what you send us, if you encrypt it)) (acting as processors); and/or
- where we are required by law to do so.

Retaining your personal data: This information will be kept for the duration of our contract with the company who is purchasing our products and/or services, and then 7 years thereafter in the event of a legal claim. However:

- if we are required by law to retain it for longer, we will retain it for the required period; and/or
- where the information is being used in connection with legal proceedings (including prospective legal proceedings) it will be retained for the duration of those legal (and any enforcement) proceedings.

Your rights: Please see Your rights.

If you have also visited our Site, please see *Visitors to our Site*.

# **SUPPLYING TO US**

Personal data we collect: If you contact us or we contact you (by phone, email or otherwise) in connection with supplying services, goods and/or software to us, we will hold your name, job title/profession, employer details, email address(es), phone number(es), location and demographic information (such as your preferences and interests) (including any other details that appear on your business card which you provide to us).

We may also collect:

 information and documentation that we obtain about you and your business from publicly available information (e.g. your website, social media and Companies House) when we carry out research (this is to ensure that we understand you and your business);

- information you give us when you attend any of our events and/or webinars, whether hosted by us or a third party, (including when you register to provide feedback); and/or
- information about you from social media platforms including when you interact
  with us on those platforms or access our social media content (the information
  we may receive is governed by the privacy settings, policies, and/or
  procedures of the applicable social media platform, and we encourage you to
  review them).

We do not record calls.

Using your personal data: We will use this information for the following legitimate interests (whether ours or a third party's):

- to enable us to perform our contract with the company who is supplying services, goods and/or software to us, or to take steps to enter into such contract:
- to manage payments, fees and charges due under our contract;
- to manage our relationship with the company who is supplying services, goods and/or software to us including notifying changes to our terms or this Policy and keeping our records updated;
- the organisation of, and to follow up, events and/or webinars that you have registered to attend; and/or
- notifying you about any other events, products and services and/or webinars we think you might be interested in.

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 (see **Who we are**).

- our employees, contractors, consultants and freelancers (but their use shall be limited to the performance of their duties and in line with the reason for processing);
- when information about you is processed by our third-party IT support provider (acting as a processor), for the purposes of providing IT support to us;
- when information about you is processed by our CRM tools which are owned, hosted and supported by third parties (acting as processors);
- when information about you is processed by our accounting software which is owned, hosted and supported by third parties (acting as processors);
- our third party website hosting supplier (acting as a processor) to enable them to maintain and host our Site:

- when information about you is shared with Marketing agencies who we engage from time to time to provide us with marketing and sales support
- various third parties (acting as processors) who provide tools and cloud solutions to enable our business to operate (including email, instant messaging, document management and file-sharing) (acting as processors);
- when information about you is shared with third parties who provide credit reference checks for us and/or who assist us to recover monies owed to us (acting as processors or joint controllers);
- with professional advisers (acting as processors or joint controllers) including lawyers, bankers, auditors and insurers based in the United Kingdom who provide legal, banking, accounting and insurance services;
- when information about you is shared HM Revenue & Customs, regulators and other authorities (acting as controllers or processors) who require reporting of processing activities in certain circumstances;
- if we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- when information about you is shared with third parties who help us to arrange and/or host events and/or webinars that you have registered to attend (acting as processors or controllers);
- with our telephony supplier (which would get to see phone numbers if we call you) and our broadband supplier (which could see email addresses (but not the content of what you send us, if you encrypt it)) (acting as processors); and/or
- where we are required by law to do so.

Retaining your personal data: This information will be kept for the duration of our contract with the company who is supplying to us, and then 7 years thereafter in the event of a legal claim. However:

- if we are required by law to retain it for longer, we will retain it for the required period; and/or
- where the information is being used in connection with legal proceedings (including prospective legal proceedings) it will be retained for the duration of those legal (and any enforcement) proceedings.

Your rights: Please see Your rights.

If you have also visited our Site, please see *Visitors to our Site*.

### MAKING ENQUIRIES AND REQUESTING OTHER INFORMATION FROM US

Personal data we collect: If you contact us or we contact you (by phone, email or otherwise) to make an enquiry about our products and/or services, or request information or a quote from us, we will hold your name, job title/profession, employer details, email address(es), phone number(s), location and any other details you give

us (such as the details you complete if you use a form on our Site to contact us or any other details that appear on your business card which you provide to us).

## We may also collect:

- information about you from social media platforms including when you interact
  with us on those platforms or access our social media content (the information
  we may receive is governed by the privacy settings, policies, and/or
  procedures of the applicable social media platform, and we encourage you to
  review them); and/or
- information and documentation that we obtain about you and your business from publicly available information (e.g. your website, social media and Companies House) when we carry out research (this is to ensure that we understand you and your business).

We do not record calls.

*Using your personal data:* We will use this information for the following legitimate interests (whether ours or a third party's):

- to respond to your enquiry or provide you with a quote;
- to provide you with the information you have requested from us and that we think might be of interest to you;
- the organisation of, and to follow up, events and/or webinars that you have registered to attend;
- notifying you about any other events, products and services and/or webinars we think you might be interested in;
- to send you marketing communications (see *Marketing*); and/or
- to conduct market research that will help us better understand our target market and tailor our marketing communication.

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 (see **Who we are**).

- our employees, contractors, consultants and freelancers (but their use shall be limited to the performance of their duties and in line with the reason for processing);
- when information about you is processed by our third-party IT support provider (acting as a processor) for the purposes of providing IT support to us;
- when information about you is processed by our CRM tools which are owned, hosted and supported by third parties (acting as processors);

- when information about you is processed by our accounting software which is owned, hosted and supported by third parties (acting as processors);
- our third party website hosting supplier (acting as a processor) to enable them to maintain and host our Site;
- when information about you is shared with Marketing agencies who we engage from time to time to provide us with marketing and sales support
- if we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- when information about you is shared with third parties who help us to arrange and/or host events and/or webinars that you have registered to attend (acting as processors or controllers;
- with our telephony supplier (which would get to see phone numbers if we call you) and our broadband supplier (which could see email addresses (but not the content of what you send us, if you encrypt it)) (acting as processors); and/or
- where we are required by law to do so.

Retaining your personal data: This information will be kept for the duration of your enquiry or request and for so long as you are engaging with our marketing campaigns (e.g., by opening/clicking/downloading our marketing communications) (we review our marketing database to identify activity and inactivity every 12 months). However:

- if we are required by law to retain it for longer, we will retain it for the required period; and/or
- where the information is being used in connection with legal proceedings (including prospective legal proceedings) it will be retained for the duration of those legal (and any enforcement) proceedings.

Your rights: Please see Your rights.

If you have also visited our Site, please see *Visitors to our Site*.

#### COMPLETING A SURVEY OR GIVING US FEEDBACK

Personal data we collect: If you complete a survey or otherwise give us feedback, we will hold (as applicable) your name, job title, contact details and any other details you choose to give us when you complete a survey or feedback form. If you choose to provide this information, we may also hold information about your gender, race or ethnic origin, religious or philosophical beliefs, political opinions, or information about your health.

We will not collect any personal data (including sensitive personal data) about you if our surveys or feedback forms are being run on an anonymous basis.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate information about the different types of groups we support or work with. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Policy.

Using your personal data: We will use information you give us when you complete a survey or otherwise give us feedback for the following legitimate interests (whether ours or a third party's) (as applicable):

- to understand client demographics:
- to determine additional products and services that would be of interest to our clients;
- to measure client satisfaction with our products and services;
- to understand our clients as well as interactions with our brand:
- to create and tailor marketing tactics and campaigns based on what we learn; and/or
- for direct marketing communications or sales follow-up calls (see *Marketing*).

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 (see **Who we are**).

- our employees, contractors, consultants and freelancers (but their use shall be limited to the performance of their duties and in line with the reason for processing);
- to enable us to facilitate and manage surveys and feedback, we may also share certain personal data with various third parties (acting as controllers or processors) who (i) we partner with; and/or (ii) provide software and/or tools that we use in connection with such surveys and feedback;
- when information about you is processed by our third-party IT support provider (acting as a processor), for the purposes of providing IT support to us:
- when information about you is processed by our CRM tools which are owned, hosted and supported by third parties (acting as processors);
- our third party website hosting supplier (acting as a processor) to enable them to maintain and host our Site;
- various third parties (acting as processors) who provide tools and cloud solutions to enable our business to operate (including email, instant messaging, document management and file-sharing) (acting as processors);

- if we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; and/or
- where we are required by law to do so.

Retaining your personal data: This information will be kept for a period of 12 months and then anonymised. However:

- if we are required by law to retain it for longer, we will retain it for the required period; and/or
- where the information is being used in connection with legal proceedings (including prospective legal proceedings) it will be retained for the duration of those legal (and any enforcement) proceedings.

Your rights: Please see Your rights.

If you have also visited our Site, please see Visitors to our Site.

### INTERNATIONAL TRANSFERS

We may transfer your personal data to various jurisdictions to perform our obligations under this Policy and related agreements. The applicable data protection laws of those jurisdictions may differ from the data protection laws of your country and, in some cases, may not be as protective. Whenever we transfer your personal data outside your country of residence, we will ensure a similar degree of protection is afforded to it as the data protection laws of your country. For example, if you are based in the UK or EEA, your personal data may be transferred to countries that have been deemed to provide an adequate level of protection for personal data by (as applicable) the UK Government or the European Commission. In other instances, we will ensure at least one other lawful safeguard is implemented, which may include the use of specific contracts approved by (as applicable) the UK Government or the European Commission.

#### YOUR RIGHTS

In relation to personal data we hold about you, you have the right to:

- where we process your personal data based on your consent, to withdraw your consent easily and at any time;
- get access to your personal data that we hold and receive information about our processing of it;
- ask us to correct the record of your personal data maintained by us if it is inaccurate or to complete incomplete personal data;
- ask us, in certain instances, to erase your personal data or cease processing;

- object to us processing your personal data for direct marketing purposes (see *Marketing*);
- challenge us processing your personal data which has been justified on the basis of our legitimate interests;
- ask us, in certain instances, to restrict processing personal data to merely storing;
- ask us, in certain limited instances, to transfer your personal data to another online provider;
- not to be subject to automated decision making (including profiling) in certain circumstances: and
- prevent processing that is likely to cause damage or distress to you and seek compensation from us for any damages caused to you by us breaching any DP Laws:
- be notified of a personal data breach which is likely to result in high risk to your rights and freedoms.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

You may access certain areas of our Site without providing any personal data at all. However, to use all features and functions available on our Site you may be required to submit or allow for the collection of certain personal data. You may restrict our use of cookies. For more information, see our Cookie Policy.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

If you would like to exercise any of these rights, please contact us (see **Who we are**). We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one calendar month (starting from the day after we receive your request). Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **HOW WE PROTECT YOUR PERSONAL DATA**

To help protect the privacy of personal data you transmit, we maintain physical, technical and administrative safeguards and require the same of any third parties we share your personal data with. Any payment transactions will be encrypted. Our security technology is centrally managed and monitored by a third party IT support company. Our employee's access to business tools adheres to our Password Policy and NCSC Guidance. We are in control of all user accounts and the access privileges granted to each user account. In addition, we regularly train our staff about

the importance of confidentiality and maintaining the privacy and security of your personal data. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

As you will be aware the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our Site; any transmission is at your own risk. Once we have received your personal data, we will use physical, technical and administrative safeguards to prevent unauthorised access to your personal data.

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

### **MARKETING**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. To opt out of marketing communications, see *Opting out* below.

<u>Promotional offers from us</u>: We may use your location, browsing history on our website, resources downloaded on our Site, forms filled on our Site, social media engagements with us, event and webinar engagements with us or third parties who help us to arrange and/or host events and/or webinars, email exchanges with our employees, contractors, consultants and freelancers, previous purchasing history of our products and/or services, and phone calls with our employees, contractors, consultants and freelancers, to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us, if we think the information might be of interest to you, or if you have purchased products or services from us and you have not opted out of receiving that marketing.

<u>Third-party marketing:</u> We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out: You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions. Please note that if you ask us not to contact you by email at a certain email address, we will retain a copy of that email address on a "suppression list" in order to comply with your no-contact request.

We will process your personal data for our legitimate interests, namely to enable us to grow our business and develop our products/services. 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 (see **Who we are**).

You are free to change your marketing choices at any time.

#### LINKS TO THIRD PARTY WEBSITES

Our Site may, from time to time, contain links to and from the websites of third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Our Site uses interfaces with social media sites such as Facebook, LinkedIn, Twitter and others. If you choose to "like" or share information from our Site through these services, you should review the privacy policy of that service. If you are a member of a social media site, the interfaces may allow the social media site to connect your Site visit to your personal data.