

## PRIVACY POLICY

Thanks for visiting the **Acuity Solutions Ltd** website. This policy explains the what, how and why of the information we collect when you visit our website or when you use our services. It also explains the specific ways we use and disclose that information. We want to make it clear, we take your privacy extremely seriously, and we never sell your data or pass it onto any third parties for sales or marketing use. Our aim is to be as clear and open as possible about what we do and why.

This Privacy Policy is effective and updated as of 25<sup>th</sup> May 2018

### Who are we?

**Acuity Solutions Ltd**, Company No. **3197329**  
**Acuity Solutions Limited**  
**The Old Warehouse**  
**37A Church Street**  
**Weybridge**  
**Surrey**  
**KT13 8DG**  
Tel: **+44 (0)1932 237110**  
E-mail: [marketing@acuitysolutions.co.uk](mailto:marketing@acuitysolutions.co.uk)  
Data Controller: **Richard Hill**  
Contact email address: [RHill@acuitysolutions.co.uk](mailto:RHill@acuitysolutions.co.uk)

We aim to respect your privacy and are committed to protecting the confidentiality of your personal information. Our aim is to be as clear and open as possible about what we do and why, which is why we go in-depth below to explain what we collect, send and use your data for and what your rights are.

### General Basics

#### 1. Definitions

These definitions should help you understand this policy and add clarity to any terms/labels we use. When we say “we,” “us,” “our” we are referring to **Acuity Solutions Ltd**.

We are incorporated in England and Wales, we are a **Private Limited Company**.

When we say “Customer,” we are referring to the person or entity that is registered with us to use our Service. With regards to “Service” we are referring to our products/software and physical services, like consultancy.

When we say “you,” we are referring either to a Customer or to some other person who visits our Website.

“Personal Information” means any information that identifies or can be used to identify you or a Contact, directly or indirectly, including, but not limited to, first and last name, email address, occupation or other demographic information.

When we say “Contact”, we are referring to a specific data subject within a Customer or Prospect’s organisation.

An “Audience Group” is a list of Contacts and all associated information related to those Contacts.

This Privacy Policy applies to this specific website, as well as any other sites or mobile applications owned or operated by us. This includes any website, and any web pages, interactive features, applications, widgets, blogs, social networks, social network “tabs” or other online, mobile or wireless offerings that post a link to this Privacy Policy, whether accessed via computer, mobile device or other technology, manner or means.

While providing the Service, and as described in more detail below, we may collect Personal Information about a website visitor, Customer, person or email address on or related to a Contact.

You’ll see we are committed to protecting any data that we collect concerning you. By using our Service and website you agree to the use of the data that we collect in accordance with this Privacy Policy.

## *2. Changes*

We may change this Privacy Policy at any time and it will supersede this version of our Policy. The most recent version of the Privacy Policy is reflected by the version date at the top of this Privacy Policy.

All updates and amendments are effective immediately upon notice, which may be given by any means, including, but not limited to, by posting a revised version of this Privacy Policy or other notice on the website.

We will take reasonable steps to draw your attention to any changes, however, we encourage you to review this Privacy Policy often to stay informed of changes that may affect you, as your continued use of the website signifies your continuing consent to be bound by this Privacy Policy.

Our electronically or otherwise properly stored copies of this Privacy Policy are each deemed to be the true, complete, valid, authentic, and enforceable copy of the version of this Privacy Policy which were in effect on each respective date you visited the Website.

## *3. Scope*

This Privacy Policy is effective with respect to any data that we have collected, or collect, about and/or from you, according to our and [Terms and Conditions of Business](#).

## *4. Questions, Concerns & Contact Information*

If you have any questions or comments, or if you want to update, delete or change any Personal Information we hold, or you have a concern about the way in which we have handled any privacy matter, please contact our Data Controller through the following ways:

Data Controller: **Richard Hill**

Email: **[RHill@acuitysolutions.co.uk](mailto:RHill@acuitysolutions.co.uk)**

Post: **Acuity Solutions Limited**

**The Old Warehouse**

**37A Church Street**

**Weybridge**

**Surrey**

**KT13 8DG**

Phone: **+44 (0)1932 237110**

### **Why we process your personal data**

We process your personal data primarily on the basis of Legitimate Interest as a business but only if necessary for the purpose we collected it for. We will also process data on the basis of contractual and transactional obligation where necessary. We may process your data for;

- Sales and marketing activities such as calls, emails and other types of communications
- Understanding how you interact with the website and social media
- Account activity such as, email, written and verbal communications and agreements
- Financial activity, such as billing communications
- To perform obligations under a contract with you or a business you may work for

We will only store your data, for as long as we need it to undertake any of the processes listed above.

### **5. How we Collect Information About You**

- a) About You: When you sign up for or use the website or Service, consult with our customer service team, send us an email, post on our blog, or communicate with us in any way, you are voluntarily giving us information that we collect.

That information may include either your or your Contacts name, physical address, email address, IP address, phone number, as well as details including occupation, location, history, and other demographic information. By giving us this information, you agree to this information being collected, used, disclosed, transferred within the United Kingdom (to our Data Processors and data storage centres in England) and stored by us, as described in our Terms and Conditions of Use, Cookie Policy and in this Privacy Policy.

- b) Automatically: When you browse our website or use or Service, we may collect information about your visit to our website, your usage of the Service, and your web browsing. That information may include your IP address, your operating system, your browser ID, your browsing activity, and other information about how you interacted with our website or Service. We may collect this information as a part of log files as well as through the use of cookies or other tracking technologies. Our use of cookies and other tracking technologies is discussed more below, and in more detail in our [Cookie Policy](#).

To ensure our prospects and clients receive the most relevant communications, we use some automated processes to send you communications. These processes (such as lead scoring and marketing based on behaviour), might indicate what the contents of a marketing email may be, or indicate to us when the best time to contact you might be.

- c) IP address lookup: we use third parties to provide information about visitors to our websites. When you visit our website we will record your IP address. This address will be matched against public and proprietary IP address databases to provide us with information about your visit. This information may identify the organisation to whom the IP address is registered but not individuals. In some limited cases i.e. single person companies, it may be possible to identify personal data from publicly available ICANN data.
- d) Cookies, tracking & beacons: We may use various technologies to collect and store information when you use our website or Service, and this may include using cookies and

similar tracking technologies on, such as pixels and web beacons, to analyse trends, administer the website, track users' movements around the website and Service, serve targeted advertisements, and gather demographic information about our user base as a whole.

**Cookies/tracking:** Cookies allow us to provide important site functionality, so you don't have to re-enter lots of information. They also allow us to remember what links and pages have been clicked or viewed during a session. If you have provided us with personal data, completing a contact form for example, we may associate this personal data with other information. This will allow us to identify and record what is most relevant to you.

By using your browser controls, you are always in control of the cookies we store and access on your computer. More information on how to control cookies and limit personal data processing can be found at [www.youronlinechoices.com/uk/five-top-tips](http://www.youronlinechoices.com/uk/five-top-tips). For comprehensive information on how to change your cookie settings in a wide variety of different web browsers, visit [www.aboutcookies.org](http://www.aboutcookies.org).

Users can also control the use of cookies at the individual browser level. We partner with third parties to display advertising on our website or to manage and serve our advertising on other sites. Our third party partners may use cookies or similar tracking technologies in order to provide you advertising or other content based upon your browsing activities and interests. If you wish to opt out of interest-based advertising click <http://www.youronlinechoices.eu/> or if located in the Americas click <http://preferences-mgr.truste.com/>.

Please note you might continue to receive generic ads. For more information about our use of cookies and other tracking technologies, as well as how to opt out of the use of cookies, please refer to our [Cookie Policy](#).

#### **Acuity Solutions Ltd main cookies:**

##### **1. Google Analytics Cookies**

Google Analytics is a website monitoring tool that allows users to see volumes of website visitors, their source, and to analyse how the content of their website is viewed and navigated. This in turn allows optimisation of the content and pages and the marketing programs that drive traffic to the website. Google Analytics does not store any personal information about website visitors, but does use persistent cookies to identify repeat visitors. You may universally opt-out of all Google Analytics tracking used by all websites by visiting <https://tools.google.com/dlpage/gaoptout>

##### **2. GatorLeads Cookies**

GatorLeads is a tool that identifies the business or organisation that website visitors belong to, based on a reverse IP Lookup. GatorLeads also uses cookies to process this identification, and personal information about individual users is stored. Cookies used by GatorLeads store information about your current web browsing session (pages viewed, time on site etc) and the dates and times of previous website visits.

This information is used by us to profile website visitors, in order to better understand the way in which our website content is viewed by different segments. It is also used, for example, to identify the types of organisations that might be interested in purchasing services from us.

### 3. Email Marketing Post-Click Tracking Cookies

These cookies are used to report on the pages that have been viewed by visitors to the site who have followed links from our email marketing campaigns. This analysis helps us to understand additional content that is viewed by the contacts in our database and therefore allows us to improve and tailor future campaigns to those contact's specific areas of interest.

For more information about our use of cookies and other tracking technologies, as well as how to opt out of the use of cookies, please refer to our [Cookie Policy](#).

**Beacons/Pixels:** On our website and in our emails we use web beacons. When we send emails to Customers, we may track behaviour such as who opened the emails, who clicked the links and which pages of our website they have visited.

This allows us to measure the performance of our email campaigns and to improve our Service and website. To do this, we include single pixel, also called web beacons, in emails we send. Web beacons allow us to collect information about when you open the email, your IP address, your browser or email client type, and other similar details. We also include Web Beacons in the emails we deliver for you. We use the data from those Web Beacons to create reports about how your email campaign performed and what actions your Contacts took. Reports are also available to us when we send email to you, so we may collect and review that information.

- e) Data sources: other than the aforementioned ways above of obtaining data (form fills on the website, cookies, verbal and written) we may obtain information about you from third party sources, such as public databases, data service companies, social media platforms, third party data providers and our joint marketing partners. We take steps to ensure that such third parties are legally permitted or required to disclose such information to us.

Examples of the information we may receive from other sources include: demographic information, device information (such as IP addresses), location, email address, contact number, technographics, and online behavioural data (such as information about your use of social media websites, page view information, and search results and links). We use this information, alone or in combination with other information (including Personal Information) we collect, to enhance our ability to provide relevant marketing and content to you and to develop and provide you with more relevant products features, and services.

- f) Who will see your data: Your data will only be seen and used by certain trained employees of **Acuity Solutions Ltd**. We operate a role-based access policy for personal data. What this means, is that an employee will only have access to personal data, if they need that access to do their job. We do not share the personal data of prospects or clients with any third parties.

## 6. How we use of your information

We may disclose Personal Information and use personal data acquired from and provided by yourself to fulfil any of your requests and to send you appropriate and useful communications. You should be aware this includes, but not limited to, the types of communications explain in section 6, b, point 1.

A copy of our legitimate interests 'balancing test' is available on request as part of our commitment to managing your information rights. Please use the details at the start of the page to request this.

We use your data for the following purposes:

- a) To promote use of our products and services to you. For example, if we collect your Personal Information when you visit our website and do not sign up for any of the Service, we may send you an email inviting you to sign up or attend an event. If you use any of our Service or website and we think you might benefit from using another part of our Service we offer, we may send you an email about that. You can stop receiving our promotional emails by following the opt-out link included in every email we send.

In addition, we may use information we collect in order to advertise our products and/or Services to you or suggest additional features of our Services that you might consider using. In addition, we may use your Personal Information to advertise our Services to potential or other users like you. For more information on how we use cookies or other tracking technologies for these purposes, as well as how to opt out of the use of cookies, please see our [Cookie Policy](#).

- b) To send you informational and promotional content in accordance with your marketing preferences. You can stop receiving our promotional emails by following the opt-out instructions included in every email.
  1. Types of communications: By processing your Personal Information under Legitimate Interest, you will receive any specific piece(s) of information you requested, as well as allowing us to send you appropriate and useful communications.

This includes but is not limited to; invitations to our industry leading events and webinars, our latest assets (whitepapers, guides, reports, infographics, videos and case studies) and promotional offers on software and services. We would also like to keep you abreast of the charity events and initiatives we partake in.

If you are a Customer, you will also receive monthly product and service updates. These updates will highlight the great new releases we have developed.

At any time, you can update your preferences (or completely unsubscribe/opt-out of our marketing) by clicking the opt-out link in any emails you receive from us. The link will always be in the footer of the email. You can also stop receiving emails from us using that same link.

2. Types of Channel: Within your preference centre you can also specify which channel(s) you would prefer to be contacted on, or you can opt-out completely. The

three channels you will have option on are: email, SMS and post.

- c) To bill and collect money owed to us by our Customers. This includes sending you emails, invoices, receipts, notices of delinquency, and alerting you if we need a different credit card number. We use third parties for secure debit and/or credit card transaction processing, and we send billing information to those third parties to process your orders and credit card payments. To learn more about the steps we take to safeguard that data, see Section 14 below.
- d) 'System Alert' messages to our Customers. For example, we may inform you of temporary or permanent changes to our Services, such as planned outages, new features, version updates, releases, abuse warnings, and changes to our Privacy Policy.
- e) To communicate with our Customers about their account and provide customer support.
- f) To enforce compliance with our Terms and Conditions and applicable law. This may include developing tools and algorithms that help us prevent violations.
- g) To meet legal requirements, including complying with court orders, valid discovery requests, valid subpoenas, and other appropriate legal mechanisms.
- h) To provide information to representatives and advisors, including attorneys and accountants, to help us comply with legal, accounting, or security requirements.
- i) To prosecute and defend a court, arbitration, or similar legal proceeding.
- j) To respond to lawful requests by public authorities, including to meet national security or law enforcement requirements.
- k) To provide, support, and improve the Services we offer. This includes our use of the data that our Customers provide us in order to improve our service delivery. This might also include sharing your information or the information you provide us about your Contacts with our third party data processors in order to provide and support our Services or to make certain features of the Services available to you. When we do have to share information with third parties, we take steps to protect your information by requiring these third parties to enter into a contract with us that requires them to use the information we transfer to them in a manner that is consistent with this policy.
- l) To provide suggestions to you. This includes adding features that compare Customers' email campaigns, using data to suggest other publishers your Contacts may be interested in, or using data to suggest products or services that you may be interested in or that may be relevant to you or your Contacts. Some of these suggestions are generated by use of our Projects. For more information about our use of cookies and other tracking technologies for this purpose, and instructions about how to opt out of having data collected through the use of cookies, please see our [Cookie Policy](#).
- m) To transfer your information in the case of a sale, merger, consolidation, liquidation, reorganisation or acquisition. In that event, any acquirer will be subject to our obligations under this Privacy Policy, including your rights to access and choice. We will notify you of the change either by sending you an email or posting a notice on our Website.

**Combined Information:** We may combine Personal Information with other information we collect or obtain about you (such as information we source from our third party partners), to serve you specifically, such as to deliver a product or service according to your preferences or restrictions, or for advertising or targeting purposes in accordance with this Privacy Policy. When we combine Personal Information with other information in this way, we treat it as, and apply all of the safeguards in this Privacy Policy applicable to, Personal Information.

**7. Data Collection:** This is data we collect from our visitors and/or users

As you use our Service, you may request for us to import into our system Personal Information you have collected from your Contacts (and database). We have no direct relationship with your Contacts or any person other than you, and for that reason, you are responsible for making sure you have the appropriate legal permission for us to collect and process information about those individuals.

Consistent with the uses of Personal Information covered in Section 6, we may transfer Personal Information of you or your Contacts to companies that help us promote, provide, or support our Services or the services of our Customers (“Service Providers”). All Service Providers enter into a contract with us that protects Personal Information and restricts their use of any Personal Information consistent with this policy. As part of our Services, we may use and incorporate into features information you have provided, we have collected from you, or we have collected about Contacts. We may share this information, including Contact email addresses, with third parties in line with the approved uses in Section 6.

We will retain Personal Information we process on behalf of our Customers for as long as needed to provide our Services or to comply with our legal obligations, resolve disputes, prevent abuse, and enforce our agreements.

**8. Disclosing Information**

We do not disclose any personal information obtained about you from this website to third parties except when we need to do so in order to complete the transaction – e.g. when arranging for a courier company to deliver or collect goods that you have ordered. We may also use the information to keep in contact with you and inform you of developments associated with our business. You will be given the opportunity to remove yourself from any mailing list or similar device. If at any time in the future we should wish to disclose information collected on this website to any third party, it would only be with your knowledge and consent.

We may from time to time provide information of a general nature to third parties – for example, the number of individuals visiting our website or completing a registration form, but we will not use any information that could identify those individuals.

**9. Public Information and Third-Party Websites**

a) Blog. We have public blogs on our website. Any information you include in a comment on our blog may be read, collected, and used by anyone. If your Personal Information appears on our blogs and you want it removed, contact on the information provide at the start of this page. If we are unable to remove your information, we will tell you why.



b) Social media platforms and widgets. Our website includes social media features, such as the Facebook Like button. These features may collect information about your IP address and which page you are visiting on our Website, and they may set a cookie to make sure the feature functions properly. Social media features and widgets are either hosted by a third party or hosted directly on our website. We also maintain presences on social media platforms including Facebook, Twitter, Instagram and LinkedIn. Any information, communications, or materials you submit to us via a social media platform is done at your own risk without any expectation of privacy. We cannot control the actions of other users of these platforms or the actions of the platforms themselves. Your interactions with those features and platforms are governed by the privacy policies of the companies that provide them.

c) Links to third-party websites. Our website include links to other websites, whose privacy practices may be different from ours. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites. If you submit Personal Information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit.

## **10. Competitions**

We may, from time to time, offer surveys, contests, sweepstakes, or other promotions on our websites, software or through social media (collectively “Our Promotions”). Participation in Our Promotions is completely voluntary. Information requested for entry may include personal information such as your name, address, phone number, email address, username, and similar details. We use the information you provide to administer Our Promotions. We may also, unless prohibited by the Promotion’s rules or law, use the information provided to communicate with you, or other people you select, about our Services.

## **11. Your Rights**

You have certain rights given to you by law, which means you have an amount of control over your personal data that we process.

- a) Access to Your Personal Data: This right allows you to confirm that your personal data is being processed and to allow you to check if the processing is lawful.
- b) Correcting Any Mistakes: The right of rectification allows you to instruct an organisation that is processing your personal data, to rectify any mistakes.
- c) Right to be Forgotten: You have the right to instruct an organisation to erase your personal data.
- d) Stop Processing: The right to stop the processing of your personal data
- e) Moving Data: The right to data portability means that under certain circumstances you will be able to ask for your personal data to be transferred from one organisation to another.
- f) Right to Object to Direct Marketing: You have the right to object to the processing of your personal data for the purposes of direct marketing.

- g) Object to Profiling: Under certain circumstances, you are able to object to profiling and/or automated decision making.

Right to complain to the Information Commissioners Office (ICO): If you are not happy with an aspect of how Iconic Digital are processing your data, you can lodge a complaint to the supervisory authority, which is the ICO. ([www.ico.org.uk](http://www.ico.org.uk))

Before it gets to that situation, please make sure you contact our Data Controller, **Richard Hill**, **RHill@acuitysolutions.co.uk** if you wish to exercise any of your rights or if you have any questions about the processing of your personal data.

## **Security and Compliance**

### **12. Notice of Breach of Security**

If a security breach causes an unauthorised access into our system that materially affects you, then **Acuity Solutions Ltd** will notify you as soon as possible and later report the action we took in response. In all cases, we will follow our data breach policy to ensure that we comply with the law and report any necessary remedies to you and the ICO.

### **13. We operate in the United Kingdom.**

Our servers and offices are located in the United Kingdom, so your information is stored in England and is not transferred to, stored, or processed in the outside the EU or United States. We recommend you check with you other providers as their data protection, privacy, and other laws (such as the United States) might not be as comprehensive as those in the UK/EU.