

T&Cs, Privacy and Cookies Policy

1 Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors; in this policy we explain how we will treat your personal information.
- 1.2 We will ask you to consent to our use of cookies in accordance with the terms of this policy when you first visit our website.
- 1.3 This policy has been reviewed and amended to comply with GDPR.

2 Collecting personal information

- 2.1 We may collect, store and use the following kinds of personal information:
 - (a) information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths);
 - (b) information that you provide to us when registering with our website (including your email address);
 - (c) information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters (including your name and email address); and
 - (i) any other personal information that you choose to send to us;
- 2.2 Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy.

3 Using personal information

- 3.1 Personal information submitted to us through our website will be used for the purposes specified in this policy or on the relevant pages of the website.
- 3.2 We may use your personal information to:
 - (a) administer our website and business;
 - (b) personalise our website for you;
 - (c) enable your use of the services available on our website;
 - (g) send you non-marketing commercial communications;
 - (h) send you email notifications that you have specifically requested;
 - (i) send you our email newsletter, if you have requested it (you can inform us at any time if you no longer require the newsletter);
 - (j) provide third parties with statistical information about our users (but those third parties will not be able to identify any individual user from that information);
 - (k) deal with enquiries and complaints made by or about you relating to our website;

- (l) keep our website secure and prevent fraud; and
 - (m) verify compliance with the terms and conditions governing the use of our website;
- 3.3 We will not under any circumstance disclose your personal information to any third party for any purpose what so ever.

4 Disclosing personal information

- 4.1 We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents insofar as reasonably necessary for the purposes set out in this policy.
- 4.2 We may disclose your personal information to any member of our group of companies this means our subsidiaries, our ultimate holding company and all its subsidiaries insofar as reasonably necessary for the purposes set out in this policy.
- 4.3 We may disclose your personal information:
- (a) to the extent that we are required to do so by law;
 - (b) in connection with any ongoing or prospective legal proceedings;
 - (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
 - (d) to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling; and
 - (e) to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.
- 4.4 Except as provided in this policy, we will not provide your personal information to third parties.

5 International data transfers

5.1 Information that we collect will be stored and processed only in the United Kingdom.

6 Retaining personal information

6.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal information.

6.2 Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

6.3 Without prejudice to Section 6.2, we will usually delete personal data falling within the categories set out below at the date/time set out below:

(a) User profiles will be retained within archived reporting systems for a period of no more than three years after the reporting system has been archived. Archived systems are not accessible via the internet and stored within a separate secure storage system.

6.4 Notwithstanding the other provisions of this Section 6, we will retain documents (including electronic documents) containing personal data:

(a) to the extent that we are required to do so by law;

(b) if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and

(c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

7 Security of personal information

7.1 We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

7.2 We will store all the personal information you provide on our secure (password- and firewall-protected) servers.

7.3 You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet, unless the site you are using is protected by a valid certificate (i.e. the URL starts with HTTPS://).

7.4 You are responsible for keeping the password you use for accessing our website(s) confidential; we will not ask you for your password (except when you log in to our website).

8 Amendments

8.1 We may update this policy from time to time by publishing a new version on our website.

8.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

8.3 We may notify you of changes to this policy by email or through the private messaging system on our website.

8.4 This is controlled document and is part of our Quality and Information Security Management System required by ISO27001. As such a change log is attached to the end of this document which contains a record of what amendments, additions or deletions have been made and by whom they were made.

9 Your rights

9.1 Under GDPR you have the following rights

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Data Liberation Ltd refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

9.2 If you would like a copy of any personal information we hold about you; provision of such information will be subject to:

- (a) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport).

9.3 We may withhold personal information that you request to the extent permitted by law.

9.4 You may instruct us at any time not to process your personal information for marketing purposes.

9.5 In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

10 Third party websites

10.1 Our website may include hyperlinks to, and details of, third party websites.

10.2 We have no control over, and are not responsible for, the privacy policies and practices of third parties.

11 Updating information

- 11.1 Please let us know if the personal information that we hold about you needs to be corrected or updated.

12 About cookies

- 12.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 12.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 12.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.
- 12.4 Cookies can be used by web servers to identify and track users as they navigate different pages on a website and identify users returning to a website.

13 Our cookies

- 13.1 We use both session and persistent cookies on our website.
- 13.2 The names of the cookies that we use on our website, and the purposes for which they are used, are set out below:
- (a) We use the session cookie ".DATA LIBAUTH" on our website to prevent fraud and improve the security of the website.
 - (b) We use the session cookie "ASP.NET_SessionId" on our website to prevent fraud and improve the security of the website.
 - (c) We use the persistent cookie "cookieOptIn" to identify whether you have hidden the cookie warning message.
 - (d) For administrators in the backoffice we use the persistent cookies "UMB_UPDCHK", "UMB_UCONTEXT", "XSRF-TOKEN", "XSRF-V" to administer the website.

14 Analytics cookies

- 14.1 We use Google Analytics and WhosOn to analyse the use of our website.
- 14.2 Our analytics service provider generates statistical and other information about website use by means of cookies.
- 14.3 The analytics cookies used by our website have the following names: `_ga`, `_gat`, `__utma`, `__utmt`, `__utmb`, `__utmc`, `__utmz`, `__utmv` and `whoson`.
- 14.4 The information generated relating to our website is used to create reports about the use of our website.
- 14.5 Our analytics service provider's privacy policy is available at:
- (a) <http://www.google.com/policies/privacy/>

- (b) <http://www.whoson.com/privacy>

15 Third party cookies

15.1 Our website does not use any other third-party cookies.

16 Blocking cookies

16.1 Most browsers allow you to refuse to accept cookies; for example:

- (a) in Internet Explorer (version 11) you can block cookies using the cookie handling override settings available by clicking "Tools", "Internet Options", "Privacy" and then "Advanced";
- (b) in Firefox (version 39) you can block all cookies by clicking "Tools", "Options", "Privacy", selecting "Use custom settings for history" from the drop-down menu, and unticking "Accept cookies from sites"; and
- (c) in Chrome (version 67), you can block all cookies by opening Chrome, at the top right, click the three vertical dots, then Settings. At the bottom, click Advanced, under "Privacy and security," click Content settings and then click Cookies. From here, you can control what cookies settings you require. For more details enter the search term "block cookies chrome" into Google.

16.2 Blocking all cookies will have a negative impact upon the usability of many websites.

16.3 If you block cookies, you will not be able to use all the features on our website.

17 Deleting cookies

17.1 You can delete cookies already stored on your computer; for example:

- (a) in Internet Explorer (version 11), you must manually delete cookie files (you can find instructions for doing so at <http://windows.microsoft.com/en-gb/internet-explorer/delete-manage-cookies#ie=ie-11>);
- (b) in Firefox (version 39), you can delete cookies by clicking "Tools", "Options" and "Privacy", then selecting "Use custom settings for history" from the drop-down menu, clicking "Show Cookies", and then clicking "Remove All Cookies"; and
- (c) in Chrome (version 44), you can delete all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Clear browsing data", and then selecting "Cookies and other site and plug-in data" before clicking "Clear browsing data".

17.2 Deleting cookies will have a negative impact on the usability of many websites.

18 Data protection registration

18.1 We are registered as a data controller with the UK Information Commissioner's Office.

18.2 Our data protection registration number is Z8660380.

19 Our details

19.1 This website is owned and operated by Data Liberation Limited.

- 19.2 We are registered in England and Wales under registration number 2752825, and our registered office is at 4 St. Marks Place, Wimbledon, London, SW19 7ND.
- 19.3 Our principal place of business is at 4 St. Marks Place, Wimbledon, London, SW19 7ND.
- 19.4 You can contact us by writing to the business address given above, by using our website contact form, by email to gdpr@dataliberation.com.

20 Amendment Log

Version	Date	Edited by	Reason for change/change details
1.0	14/08/2016	Chris Morgan	Full replacement from previous combined Terms & Conditions, Privacy and Cookie document
2018.1	03/04/2018	Chris Morgan	<p>The following changes were made after reviewing the suitability of this document during our review for GDPR compliance.</p> <p>Removed the following paragraphs as they were either not consistent with what we are doing now or will not apply after the changes we are making for GDPR.</p> <p>2.1(e), 2.1(f), 2.1(h), 3.2(j) , 3.3, 3.4, 5.2, 5.3, 7.3, 9.1(a)</p> <p>The following paragraphs where changed as follows:</p> <p style="padding-left: 40px;">3.5 - We will not, without your express consent, supply your personal information to any third party for the purpose of their or any other third party's direct marketing.</p> <p>Became</p> <p style="padding-left: 40px;">3.3 We will not under any circumstance disclose your personal information to any third party for any purpose what so ever.</p>
2018.2	18/05/2018	Chris Morgan	<p>Added paragraph 1.3</p> <p>Added paragraph 9.1 to outline in details the rights defined by GDPR for data subjects.</p> <p>Para 4.1 removed the references to “Suppliers or Subcontractors”</p> <p>Para 9.1. reduced the evidence of identity to a copy of a passport.</p>
2019.1	19/01/2019	Chris Morgan	Corrected spelling mistake in paragraph 8.4 (where to were)
2020.1	19/07/2020	Chris Morgan	Updated length of retention from one year to three years to meet client requirements “User profiles will be retained within archived reporting systems for a period of no more than three years after the reporting system has been archived”
2020.1	19/07/2020	Chris Morgan	Reviewed the rest of the document and all is still valid