



## **Privacy Policy / Data Privacy Statement**

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Last updated: 28<sup>th</sup> June 2020

Review due/frequency: Annual or as required

## General

At Clicknology Ltd (“Company”), we respect your need for online privacy and protect any Personal Information that you may share with us, in an appropriate manner. Our practice regarding the use of your Personal Information is as set forth below in this Privacy Policy Statement.

We are fully dedicated to complying with the General Data Protection Regulation (GDPR) responsibilities, the UK Data protection act and any regulation related to other locations we may serve.

As a condition to use of Company services, you consent to the terms of the Privacy Policy Statement as it may be updated from time to time.

In the event of a material change, we shall notify any you via email or by means of a prominent notice on the website. This Privacy Policy Statement applies to all activities and websites of the company.

Please direct all your inquiries regarding this Privacy Policy Statement or our customer services contact page.

## Information we record and how we use it:

- **Personal Information**

For the purpose of providing services and billing to you, we record your name, postal and email address, telephone and other contact details.

Company staff will have access to personal information provided by you for the purpose of contacting you and providing requested services.

We also store a record of email communication you exchange with us.

- **Location of information**

Any files, documents, emails and other data which may contain your personal information are stored at facilities in EU.

- **Financial Information**

In case of services requiring payment, we use reputed Payment Gateway Service Providers who process payment on our behalf.

The providers we use are:

GoCardless

Stripe

Paypal

We do not store on our system any personal, card or bank information you provide to the payment provider. Subject to your prior consent and where necessary for processing future payments, your financial information will be stored in encrypted form on secure servers of our reputed Payment Gateway Service Provider who is beholden to treating your Personal Information in accordance with their Privacy Policy Statement.

- **Visitor Details**

We use the Internet Protocol address, browser type, browser language, referring URL, files accessed, errors generated, time zone, operating system and other visitor details collected in our log files to analyze the trends, administer the website, track visitor's movements and to improve our website.

## With whom we share Information

We may need to disclose Personal Information to our affiliates, service providers and business partners solely for the purpose of providing Services to you. In such cases the company will also ensure that such affiliates, service providers and business partners comply with this Privacy Policy Statement and adopt appropriate confidentiality and security measures.

We will obtain your prior specific consent before we share or disclose your Personal Information to any person outside the company for any purpose that is not directly connected with providing Services to you.

We may share generic aggregated demographic information not linked to any Personal Information regarding visitors and users with our business partners and advertisers.

Please be aware that laws in various jurisdictions in which we operate may obligate us to disclose user information and the contents of your user account to the local law enforcement authorities under a legal process or an enforceable government request.

In addition, we may also disclose Personal Information to law enforcement authorities if such disclosure is determined to be necessary by the company in our sole and absolute discretion for protecting the safety of our users, employees, or the general public.

## PayPal transactions

All PayPal transactions are subject to the PayPal Privacy Policy. The full policy can be found here: <https://www.paypal.com/gb/webapps/mpp/ua/privacy-full>

## Stripe transactions

All Stripe card payment transactions are subject to the Stripe Privacy Policy. The full policy can be found here: <https://stripe.com/gb/privacy>

## GoCardless transactions

All GoCardless transactions are subject to the GoCardless Privacy Policy. The full policy can be found here: <https://gocardless.com/legal/privacy/>

## Links from our website

Some pages of our website contain external links. You are advised to verify the privacy practices of such other websites. We are not responsible for the manner of use or misuse of information made available by you at such other websites. We encourage you not to provide Personal Information, without assuring yourselves of the Privacy Policy Statement of other websites.

## How secure is your Information

We adopt industry appropriate data collection, storage and processing practices and security measures, as well as physical security measures to protect against unauthorized access, alteration, disclosure or destruction of your Personal Information, username, password, transaction information and data stored in your user account. Access to your personal information is restricted to our employees and only to those who need to know such information in connection with providing Services to you and are bound by confidentiality obligations.

## Your Choice in Information Use

You will be required to provide Personal Information to engage the Company to provide you with services. If you choose not to provide your Personal Information, we will be unable to provide you with the Services.

We provide you with the option of opting in to receiving mail from us like email notifications of new services, releases, upcoming events and changes to the Privacy Policy Statement. Should you decide not to opt-in, the company will not be able to send you important or useful information. In the event we decide to use your Personal Information for any purpose other than as stated in this Privacy Policy Statement, we will offer you an effective way to opt out of the use of your Personal Information for those other purposes.

You may opt out of receiving newsletters and other messages from the company by selecting the 'unsubscribe' function present in every message we send.

Some messages are statutory required and we must send them to you even if you choose to unsubscribe from all our emails. This may include notifications of changes to our terms and policies.

## Where your personal data may be processed?

Sometimes we will need to share your personal data with third parties and suppliers outside the European Economic Area (EEA).

### **International use**

If you are based outside the UK and use our system, we will transfer the personal data that we collect from you to our system in the UK or EU datacentre.

We currently use servers in UK to store personal information.

### **Protecting your data outside the EEA**

We may transfer personal data that we collect from you to third-party data processors in countries that are outside the EEA such as Australia or the USA.

*For example, this might be required in order to fulfil your order, process your payment details or provide support services.*

If we do this, we have procedures in place to ensure your data receives the same protection as if it were being processed inside the EEA.

Any transfer of your personal data will follow applicable laws and we will treat the information under the guiding principles of this Privacy Notice.

## How long do we keep personal data?

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected.

At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

## Your rights over your personal data - Accessing, Updating and Removing Personal Information

You have the right to request:

- Access to the personal data we hold about you, free of charge in most cases.
- The correction of your personal data when incorrect, out of date or incomplete.
- That we stop using your personal data for direct marketing (either through specific channels, or all channels).
- That we stop any consent-based processing of your personal data after you withdraw that consent.

To update any of your Personal Information please contact our customer services by email or telephone. Such changes may take up to 48 hours to take effect.

If we choose not to action your request we will explain to you the reasons for our refusal.

### **Your right to withdraw consent**

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

## Where we rely on our legitimate interest

In cases where we are processing your personal data on the basis of legitimate interest, you can ask us to stop for reasons connected to your individual situation.

We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

## Cookies

Our websites use cookies to enhance your experience using our Services. If you have turned cookies off, you may not be able to use some areas of the website. We tie cookie information to your email address to maintain and recall your preferences within the website. We may from time to time employ the use of pixel tags on the website and in emails. Pixel tags such as web beacons are 1x1 images that are embedded onto a web page to document traffic and for website analytics without collecting any Personal Information.

We may from time to time employ the services of a third party agent to analyse statistical and aggregate data about our website content and user base. This aggregated information is not personally identifiable and is employed in improving website functionality and offerings. To this end, these third parties may employ the use of cookies and, or pixel tags in providing their services. While these third party cookies are not tied to your Personal Information, the company does not have access to these cookies nor are we responsible for them.

## Children's Online Privacy Protection

The company does not knowingly collect Personal Information from users who are under 18 years of age.

## Investigation of Illegal Activity

We may need to provide access to your Personal Information and the contents of your user account to our employees and service providers for the purpose of investigating any suspected illegal activity or potential violation of the terms and conditions for use of our Services.

## Enforcement of Privacy Policy

We make every effort, including periodic reviews to ensure that Personal Information provided by you is used in conformity with this Privacy Policy Statement. If you have any concerns regarding our adherence to this Privacy Policy Statement or the manner in which Personal Information is used for the purpose of providing our Services, kindly contact the Customer Support Services. We will contact you to address your concerns and we will also co-operate with regulatory authorities in this regard if needed.

## Notification of Changes

Any changes to the Privacy Policy Statement will be posted on our website to keep you informed of any changes in nature of information collected, manner of collection, use and sharing of information. If at any point we decide to use Personal Information in a manner different from that stated at the time it was collected, we will notify you by email and provide you with the ability to opt out of these new uses. You will not receive email notification of minor changes to the Privacy Policy Statement. If you are concerned about how your Personal Information is used, you should check back periodically.

## Point of contact for data protection issues

If you have any questions or concerns regarding this Privacy Policy Statement, please contact our customer support. We shall respond to all inquiries within 30 days of receipt upon ascertaining your identity. In the event that your inquiry goes unaddressed beyond this reasonable expectation, please contact us on 0208 09 999 09 to resolve your concerns.

## END OF PRIVACY POLICY

Last updated on: 18<sup>th</sup> June 2020

