

Crosby Straightpoint Privacy Notice and Cookies Policy

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1. What's in this policy?

This policy tells you:

- what information we might collect about you;
- how we might use that information;
- when we might use your details to contact you;
- what information of yours we might share with others; and
- your choices about the personal information you give us.

2. What does this policy cover?

This policy aims to give you information on how Straightpoint (UK) Limited (**'we'**, **'our'** or **'us'**) collects and processes your personal information through your use of our website, including any information that you may provide when you purchase goods or services from us.

Straightpoint (UK) Limited, a company incorporated in England and Wales under company number 04375389, whose registered office is at: Suite 1, 7th Floor 50 Broadway, London, UK, SW1H 0BL, is the data controller and is responsible for your personal information.

We have appointed a data protection officer (**'DPO'**) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below under paragraph 12 (How can I contact Straightpoint?).

Our website 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 information about you so that you are fully aware of how and why we are using your information. This privacy policy supplements other notices and privacy policies and is not intended to override them.

3. How do you protect my personal information?

We're strongly committed to keeping your information safe. And to do this we design our services with your safety in mind. We look after your information security and privacy by putting in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

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.

Where we store your information

Some companies that provide services to us run their services from outside the European Economic Area. We only let that happen if we are satisfied with their levels of security by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal information to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer information to them if they are part of the Privacy Shield which requires them to provide similar protection to personal information shared between Europe and the US.

4. What types of personal information does Crosby Straightpoint collect about me and how is it collected?

Personal information means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal information about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

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 your Usage Data to calculate the percentage of users accessing a specific website feature or product sold by us. However, if we combine or connect Aggregated Data with your personal information so that it can directly or indirectly identify you, we treat the combined data as personal information which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

We collect personal information from you in the following ways:

a. Information that you give us

We might ask for your name and contact details, your address, your email address, your telephone number, your date of birth or financial details, depending on how you are transacting with us.

b. Information on your activities outside Straightpoint when you talk about us

Like if you've mentioned us in a Twitter post, we'll collect your Twitter handle.

c. Automated technologies or interactions

As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal information by using cookies and other similar technologies. Please see paragraph 10 (How does Straightpoint use cookies and similar tracking?) below for further details.

If you fail to provide personal information

Where we need to collect personal information by law, or under the terms of a contract we have with you, and you fail to provide that information when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

5. Why does Crosby Straightpoint collect personal information about me?

We must have a valid reason to use your personal information. It's called the "lawful basis for processing". Sometimes we might ask your permission to do things, like when you subscribe to an email. Other times, when you would reasonably expect us to use your personal information, we do not ask your permission, but only when:

- it is in our legitimate interests to do so, meaning it is in the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience;
- it is permitted by law; and
- it does not contravene the rights you have under data protection law.

We may use your personal information in the following circumstances:

- a.** where we need to deliver our services and to provide you with information about them, in order to perform the contract we are about to enter into, or have entered into, with you;
- b.** to deal with your requests, complaints and enquiries;
- c.** to help us understand what kind of services you might use;
- d.** to contact you about suggestions and recommendations for goods or services that may be of interest to you;
- e.** to update you on any changes to our practices and Terms of Use;
- f.** to invite you to take part on surveys about our services, which are always voluntary; or
- g.** where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal information although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

6. How long will Crosby Straightpoint keep my personal information?

- We only hold your personal information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements, or where we have a valid reason to keep it for longer, for example in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.
- We think about what type of information it is, the amount collected, how sensitive it might be and any legal requirements when determining the appropriate retention periods.
- We design our services so that we do not hold your personal information any longer than we have to.

Details of retention periods for different aspects of your personal information are available upon request by contacting us.

7. Will I be contacted for marketing purposes?

We may use your Identity, Contact, Technical, Usage and Profile Data 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).

We will only send you marketing emails or contact you about our products and services if you have agreed to this and you have not opted out of receiving that marketing.

Will my personal information be used when Straightpoint advertises with other companies?

We might use information that we hold about you to show you relevant and "targeted advertising" through other companies' sites, like Facebook, Google, LinkedIn or Twitter for example. This could be showing you a Straightpoint advertising message where we know you have a Straightpoint product and have used Straightpoint services.

If you do not want to see our targeted advertising, you can set ad preferences in your social media companies' settings.

Opting out

You can ask us to stop sending you marketing messages at any time by adjusting your marketing preferences, following the opt-out links on any marketing message sent to you, or by contacting us at any time.

8. When does Crosby Straightpoint share my personal information with others?

We will never sell your personal information. We do share it with others in these ways:

a. Sometimes by law we have to pass on your information to other organisations

We might share your information if we have to by law, or when we need to protect you or other people from harm.

b. To enforce our Terms of Use

We may share your information if we have to in order to enforce or apply our Terms of Use and other agreements that we may have in place with you.

c. To allow service providers or advisers to carry out services for us

We may have to share your personal information with service providers or advisers to allow them to provide services to us. This will include the following third parties:

- service providers who provide IT and system administration services, including website developments and maintenance services; and
- professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services to us.

d. To purchasers of our business or our assets

We may have to share your personal information to third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal information in the same way as set out in this privacy notice.

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

9. What are my rights?

Remember, you are in control of your personal information. We only use your personal information for legitimate business interest purposes in accordance with paragraph 5 (Why does Straightpoint collect personal information about me?) above. The intended use of your personal information is used to enable us to undertake business with you,

however if you feel that the intended use is not authorised by you, you have the following rights:

- to request a copy of your personal information we hold about you and to check that we are lawfully processing it;
- to ask us to correct your personal information that is wrong, although we may need to verify the accuracy of the new information you provide to us;
- to delete your personal information where there is no good reason for us continuing to process it. However please note that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request;
- to request that we only use your personal information for certain purposes;
- to object to the processing of your personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. However please note in some cases we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms;
- to request the transfer of your personal information to you or to a third party. We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. However please note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you; and
- to withdraw consent at any time where we are relying on consent to process your personal information. However please note this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

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

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information 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.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may 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.

Please be assured that we take the responsibility of data protection and regulation seriously and continue to adopt rigorous control procedures, fully in compliance with the GDPR.

10. How does Crosby Straightpoint use cookies and similar tracking?

a. What are cookies and tracking technologies?

Cookies are bits of data which are stored in your computer or mobile when you visit a website or app.

There are also similar pieces of tracking information we collect.

b. Why do we use cookies and other tracking?

To do a few different things, including the following:

- **to remember information about you, so you don't have to give it to us again;**
- **to help us understand how people are using our services, so we can make them better; and**
- **to find out if our emails have been read and if you find them useful.**

A few things on our website would not work without some cookies. Tech people call these "strictly necessary cookies". They are always on when you visit our website.

But we want to use others like functional, performance and advertising cookies to make your experience more enjoyable. We will only use them if you have agreed. You can always change your mind.

Bear in mind there are some other cookies out there from other companies. These "third-party cookies" might track how you use different websites, including ours. For example, you might get a social media company's cookie when you see the option to share something. You can turn them off, but not through us.

c. How long do cookies last?

Some are erased when you close the browser on our website or app. Others stay longer, sometimes forever, and are saved onto your device so they are there when you come back.

d. How do I control my cookies and tracking?

When you first visit us, we will tell you about our cookies and ask you to agree if we can use them. You can always change your mind by going to your settings.

Stopping all cookies might mean you are unable to access some of our services, or that some of them might not work properly for you.

Another way to control some tracking is in the settings on your device.

11. How will I find out about changes to this policy?

We update this policy sometimes. If we make important changes, like how we use your personal information, we will let you know. It would normally be communicated by email.

If you don't agree to the changes, then you can always stop using our services and stop giving us any more personal information. We would be sorry to see you go.

12. How can I contact Crosby Straightpoint?

For any questions or comments about this policy please contact our Data Protection Officer using the following means of communication:

- Email: thomas.dietvorst@thecrosbygroup.com - Tel: +44(0)2392484491
- by post:
Crosby Straightpoint,
123 Proxima Park,
Houghton Avenue,
Waterlooville,
Hampshire,
PO7 3DU

We're regulated by the Information Commissioner's Office ('ICO'). You have the right to make a complaint to the ICO, however we would appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance. You can also contact the ICO for advice and support using the following link: <https://ico.org.uk/>