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Privacy Policy

This Privacy Policy sets out how we, Dataflexnet Limited, collect, store and use information about you when you use or interact with our services (the “Services”) and via our online sites/applications (the “Sites”). This policy also describes where we otherwise obtain or collect information about you, how we store, collect and use that information and with whom we share it. This policy does not apply to third party websites, products and services, even if they link to one or more of our Sites, and you should consider the privacy policies of those third-party sites separately. This Privacy Policy is effective from **18th May 2021**.

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Summary

This section summarises how we obtain, store and use information about you. It is intended to provide a very general overview only. **It is not complete in and of itself and it must be read in conjunction with the corresponding full sections of this Privacy Policy which gives further information.**

- We obtain personal data about you when you visit one of our Sites, or if you are a user of our Services. We may also receive personal data about you via our clients, employees, affiliates, Integrators or other third parties to enable us to provide the Services. Where you are a user of our Services, Dataflexnet may be acting as a third-party service provider. In such instances although we may collect and process information from you directly, we will only do so as a data processor on the written instructions of our customer to whom we are providing services on behalf of.

- **Your rights in relation to your information**
 - to access your information and to receive information about its use
 - to have your information corrected and/or completed
 - to have your information deleted
 - to restrict the use of your information
 - to receive your information in a portable format
 - to object to the use of your information
 - to withdraw your consent to the use of your information
 - to complain to the Information Commissioner's Office (ICO) at any time.
- **How we collect or obtain information about you:**
 - through an integrated third party (the "Integrators")
 - as a **user** - from your use of our Services or websites
 - via another third party with whom you have contracted and for whom we are providing services to
 - when you otherwise directly contact us.
- **Personal Data/Information we collect:** personal data/information is any information that relates to an identified or identifiable person. This may include (but is not limited to) an email address, IP address, default language, locale, employee details, information about your computer or device (e.g. device and browser type), information about how you use our websites (e.g. which pages you have viewed, the time when you view them and what you clicked on, the geographical location from which you accessed the Service(s) based on your IP address). It does not include data where the identity has been removed (anonymous data).
- **How we use your information:** for administrative and business purposes, to support you if asked, and offer the functionality of the Services to you, the Integrators, or our Clients, to improve our business and service, to fulfil our contractual obligations, to analyse your use of our Services, in-connection with our legal rights, obligations, security and service improvement.
- **Disclosure of your information to third parties:** only to the extent necessary to service our Integrators or our clients in providing our Services, to fulfil any contracts we enter into with you, with Integrators, with our clients and where required by law.
- **We do NOT sell your information to third parties (other than in the course of a business sale or purchase or similar event).** However, we do reserve the right to transfer or disclose personal data in connection with a sale of business or assets.
- **How long we retain your information:** for no longer than necessary, taking into account any legal obligations we have (e.g. to maintain records for tax purposes), any other legal basis we have for using your information (e.g. your consent, performance of a contract with you, an Integrator or client or our legitimate interests as a business), or for security purposes. For specific retention periods in relation to certain information which we collect from you, please see the main section below entitled How long we retain your information.
- **How we secure your information:** using appropriate technical and organisational measures such as storing your information strongly encrypted, encrypting transfer of data to or from our servers using Secure Sockets Layer (SSL) technology, and strong authentication and authorisation controls with Integrators. We will notify the data subject and any regulator where legally obliged to do so.

- **Use of cookies:** we use cookies on our Sites. For further information on the cookies we use please see our cookie policy.
 - **For clients or users outside of the UK:** information may be transferred to Dataflexnet affiliates, business partners, Integrators and other data processors outside of the UK. We will always protect and secure the security of this information. For further information please refer to the section of this privacy policy entitled Transfer of your information outside the UK.
- Use of automated decision making and profiling:** we take automated decisions in relation to authentication and security based on use of the Service(s), including cookies, activity logs, computer and devices.
- **Sensitive personal information:** we do not knowingly or intentionally collect what is commonly referred to as 'sensitive personal information'. Please do not submit sensitive personal information about you to us. For more information, please see the main section below entitled Sensitive Personal Information.

Our details

Dataflexnet Limited is a company registered in England under company number: 03187275 UK, whose registered office is at Unit Lb Priestly Court, Staffs Technology Park, Beaconside, Stafford, United Kingdom, ST18 0LQ.

We have appointed a data protection officer (DPO) who is responsible for answering any queries about this policy.

If you have any questions about this Privacy Policy, please contact our DPO using the postal details above or by emailing dpo@dataflexnet.com

Information we collect when you visit our Sites

We collect and use information from visitors to our Sites in accordance with this section and the section entitled Disclosure and additional uses of your information.

Web server log information

We use third party servers to host our Services and store our information, these third party servers are hosted by AWS, the privacy policy of which is available here: <https://aws.amazon.com/compliance/iso-27018-faqs/> and the Dinit CS group, the privacy policy of which can be found here <http://www.dinitcs.com/>; hereafter referred to as third-party hosts. Our Services server automatically logs the IP address you use to access our Services as well as other information about your visit such as the pages accessed, information requested, the date and time of the request, the source of your access to our Services (e.g. the service or URL (link) which referred you to our Services), and your browser version and operating system and data to track use of security tokens.

The Servers of our third-party hosts are located across Ireland, Slovenia, Switzerland and India, **accordingly**, your information will be transferred outside the UK. For further information and information on the safeguards used, please see the section of this privacy policy entitled Transfers of your information outside the UK.

Use of Service server log information for IT security purposes

We and our third-party hosting provider collect(s) and store(s) server logs to ensure network and IT security and so that the server and Services remain uncompromised. This includes analysing log files to help identify and prevent unauthorised access to our network, the distribution of malicious code, denial of services attacks and other cyber-attacks, by detecting unusual or suspicious activity.

We do not make, nor do we allow our hosting provider to make, any attempt to identify you from the information collected via server logs.

Legal basis for processing: compliance with a legal obligation to which we are subject (Article 6(1)(c) of the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) (UK GDPR)).

Legal obligation: we have a legal obligation to implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk of our processing of information about individuals. Recording access to our Services using server log files is such a measure.

Legal basis for processing: our and our third-party hosts legitimate interests (Article 6(1)(f) UK GDPR).

Legitimate interests: we and our third-party hosting providers have a legitimate interest in using your information for the purposes of ensuring network and information security.

Cookies

Cookies are data files which are sent from a service to a browser to record information about users for various purposes.

We use cookies on our Sites, including essential, functional, analytical cookies.

You can reject some cookies we use on or via our Sites by changing your browser settings but doing so can impair your ability to use our **Services** or some or all of its features. For further information about cookies, including how to change your browser settings, please visit <http://www.allaboutcookies.org/>.

Information we collect when you contact us

We collect and use information from individuals who contact us directly in accordance with this section and the section entitled Disclosure and additional uses of your information.

Email

When you send an email to the email address displayed on our Sites we collect your email address and any other information you provide in that email (such as your name, telephone number and the information contained in any signature block in your email).

Legal basis for processing: our legitimate interests (Article 6(1)(f) UK GDPR).

Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) UK GDPR).

Reason why necessary to perform a contract: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

Transfer and storage of your information

We use a third party email provider to store emails you send us. Our third party email provider is Office 365. Their privacy policy is available here: <https://www.microsoft.com/trust-center/privacy>

Emails you send us will be stored within the UK on our third-party email provider's servers in United Kingdom. For further information, please see the section of this privacy policy entitled Transfers of your information outside the UK.

Information we collect when you interact with or use our Services

We collect and use information from individuals who interact with features of our Services in accordance with this section and the section entitled Disclosure and additional uses of your information.

Use of our Services

When you use our Services, whether directly or via an Integrator or other third party we collect information including: email address, IP addresses, language and locale preferences, your service activity, and any other information provided to us.

If you do not provide the mandatory information required you may not be able to use our Services.

Legal basis for processing: our legitimate interests (Article 6(1)(f) UK GDPR).

Legitimate interest: use of our Service to facilitate the running and operation of our Services and business.

Transfer and storage of your information

Information you submit to us via a registration form on our Services will be stored on our own or a third-party hosts server across Ireland, India, Switzerland or Slovenia and for email the United Kingdom. In addition, information may be transferred to our clients, Integrators or other third-party data processors outside of the UK in order for us to deliver the Services.

For further information about the safeguards used when your information is transferred outside the UK, see the section of this privacy policy below entitled Transfers of your information outside the UK.

Registering on our Services

When you register on our Services, we collect information including (but not limited to): email, name, language, IP addresses, language and locale preferences, and any other information you provide to us or use the Services.

If you do not provide the mandatory information required, you may not be able to use our Services.

Legal basis for processing: our legitimate interests (Article 6(1)(f) UK GDPR).

Legitimate interest: registering and administering accounts on our Services to facilitate the running and operation of our services and business.

Transfer and storage of your information

Information you submit to us via the registration form on our Services will be stored on our own or one of our third-party hosts servers across Ireland, Slovenia, Switzerland and India and for email United Kingdom. In addition such information may also be shared with our clients, Integrators or other third party data processors outside of the UK in order for us to deliver the Services.

For further information about the safeguards used when your information is transferred outside the UK, see the section of this privacy policy below entitled Transfers of your information outside the UK.

Information collected or obtained from third parties

This section sets out how we obtain or collect information about you from third parties.

Information received from third parties

Generally, we do NOT receive information about you from third parties. The third parties from which we receive information about you are through Integrators, our clients and other affiliates or business partners who you have contracted with or who are integrating with us to provide a service which you have requested.

Information we obtain from **Integrators** will include any additional information about you which they provide to us.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) UK GDPR).

Reason why necessary to perform a contract: where a third party has passed on information about you to us (such as your name and email address) in order for us to provide services to you.

Legal basis for processing: consent (Article 6(1)(a) UK GDPR).

Consent: where you have asked that a third party share information about you with us and the purpose of sharing that information is not related to the performance of a contract or services by us to you, we will process your information on the basis of your consent, which you give by asking the third party in question to pass on your information to us.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the UK GDPR).

Legitimate interests: where a third party has shared information about you with us and you have not consented to the sharing of that information, we will have a legitimate interest in processing that information in certain circumstances.

For example, we would have a legitimate interest in processing your information to perform our obligations under a sub-contract with the third party, where the third party has the main contract with you. Our legitimate interest is the performance of our obligations under our sub-contract.

Similarly, third parties may pass on information about you to us if you have infringed or potentially infringed any of our legal rights. In this case, we will have a legitimate interest in processing that information to investigate and pursue any such potential infringement.

Where we receive information about you in error

If we receive information about you from a third party in error and/or we do not have a legal basis for processing that information, we will delete your information.

Other information obtained by us from third parties

We do NOT obtain information about you from certain publicly accessible sources, both domestically and internationally.

In certain circumstances we will obtain information about you from private sources, both domestically and internationally, for the purpose of security, only those explicitly integrated with our Services.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) UK GDPR).

Reason why necessary to perform a contract: where you have entered into a contract or requested that we enter into a contract with you, in certain circumstances, we will obtain information about you from public sources in order to enable us to understand your business and provide services to you or services to a sufficient standard.

For example, we would obtain and/or verify your email address from your service or from a directory where you ask us to send you information by email but we do not possess the information or we need to confirm that we have recorded your email address correctly.

Legal basis for processing: our legitimate interests (Article 6(1)(f) UK GDPR).

Legitimate interests: in certain circumstances, we will have a legitimate interest in obtaining information about you from public and private sources. For example, if you have infringed or we suspect that you have infringed any of our legal rights, we will have a legitimate interest in obtaining and processing information about you from such sources in order to investigate and pursue any suspected or potential infringement.

Our use of automated decision-making and profiling

We do not use automated decision making on our Services other than as set out below. We do not consider this has any legal effect on you or similarly significantly affects you.

Automated decision making

Automated decision making is decision making by technological means (i.e. by a machine) without human involvement.

Use of automated decision making for authentication

We use automated decision making based on your past activity. We will make decisions about how you may be authenticated by the Services. This is based on cookies, device and machine information, IP, past activity, and similar address information, prior access grants, and prior audit records.

Significance and envisaged consequences: We use automated decision making to limit unauthorised access to integrated parties and your information.

How to object: As these are inherent in the security of the Services you may object by asking us to delete your account.

Legal basis for processing: our legitimate interests (Article 6(1)(f) UK GDPR).

Legitimate interest: The Services uses automated decision making to improve protection of your personal information from unauthorised access.

Profiling

Profiling is any form of automated processing of your information to evaluate personal aspects about you, in particular to analyse or predict things like your performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

We do NOT profile you.

Disclosure and additional uses of your information

This section sets out the circumstances in which we will disclose information about you to third parties and any additional purposes for which we use your information.

Disclosure of your information to service providers

We use several third-parties to provide us with services which are necessary to run our business or to assist us with running our business and who process your information for us on our behalf. These include the following:

- Telephone provider(s).
- SMTP provider(s), sending emails.
- Email provider(s), Office 365. Their privacy policy is available here: <https://www.microsoft.com/trust-center/privacy>
- Hosting provider(s), AWS and Dinit CS. Their privacy policies are available here: <https://aws.amazon.com/compliance/iso-27018-faqs>
<https://dinitcs.com/>

Your information will be shared with these service providers where necessary to provide you with the Services you have requested.

We do not display the identities of all of our service providers publicly by name for security, commercial and legal reasons. If you would like further information about the identities of our service providers, however, please contact us directly and we will provide you with such information where you have a legitimate reason for requesting it (where we have shared your information with such service providers, for example).

Legal basis for processing: legitimate interests (Article 6(1)(f) UK GDPR).

Legitimate interest relied on: where we share your information with these third parties in a context other than where is necessary to perform a contract (or take steps at your request to do so), we will share your information with such third parties in order to allow us to run and manage our business efficiently.

Legal basis for processing: necessary to perform a contract and/or to take steps at your request prior to entering into a contract (Article 6(1)(b) of the UK GDPR).

Reason why necessary to perform a contract: we may need to share information with our service providers to enable us to perform our obligations under that contract or to take the steps you have requested before we enter into a contract with you.

Disclosure of your information to other third parties

We disclose your information to other third parties in order to provide our Services or fulfil our contractual obligations including those set out below.

Integrators

Integrators are businesses we work with who provide goods and services which are complementary to our own or which allow us to provide goods or services which we could not provide on our own. We share information with our business partners where you have requested services which they provide whether independently, or in connection with our own Services.

Legal basis for processing: legitimate interests (Article 6(1)(f) of the UK GDPR).

Legitimate interest(s): to provide services to you or our client and perform our contractual obligations to that client.

Sale of Business or Assets

We may share your information with a prospective or actual purchaser or seller in the context of a business or asset sale or acquisition by us, a merger or similar business combination event, whether actual or potential.

Legal basis for processing: legitimate interests (Article 6(1)(f) UK GDPR).

Legitimate interest(s): sharing your information with a prospective purchaser, seller or similar person in order to allow such a transaction to take place.

Disclosure and use of your information for legal reasons

Indicating possible criminal acts or threats to public security to a competent authority

If we suspect that criminal or potential criminal conduct has been occurred, we will in certain circumstances need to contact an appropriate authority, such as the police. This could be the case, for instance, if we suspect

that fraud or a cybercrime has been committed or if we receive threats or malicious communications towards us or third parties.

We will generally only need to process your information for this purpose if you were involved or affected by such an incident in some way.

Legal basis for processing: our legitimate interests (Article 6(1)(f) UK GDPR).

Legitimate interests: preventing crime or suspected criminal activity (such as fraud).

In connection with the enforcement or potential enforcement of our legal rights

We will use your information in connection with the enforcement or potential enforcement of our legal rights, including, for example, sharing information with debt collection agencies if you do not pay amounts owed to us when you are contractually obliged to do so. Our legal rights may be contractual (where we have entered into a contract with you) or non-contractual (such as legal rights that we have under copyright law or tort law).

Legal basis for processing: our legitimate interests (Article 6(1)(f) UK GDPR).

Legitimate interest: enforcing our legal rights and taking steps to enforce our legal rights.

In connection with a legal or potential legal dispute or proceedings

We may need to use your information if we are involved in a dispute with you or a third party for example, either to resolve the dispute or as part of any mediation, arbitration or court resolution or similar process.

Legal basis for processing: our legitimate interests (Article 6(1)(f) UK GDPR).

Legitimate interest(s): resolving disputes and potential disputes.

For ongoing compliance with laws, regulations and other legal requirements

We will use and process your information in order to comply with legal obligations to which we are subject. For example, we may need to disclose your information pursuant to a court order or subpoena if we receive one or to the National Crime Agency in connection with suspected or potential money laundering matters.

Legal basis for processing: compliance with a legal obligation (Article 6(1)(c) UK GDPR).

Legal obligation(s): legal obligations to disclose information which are part of the laws of England and Wales or if they have been integrated into the United Kingdom's legal framework (for example in the form of an international agreement which the United Kingdom has signed).

Legal basis for processing: our legitimate interests (Article 6(1)(f) UK GDPR).

Legitimate interest: where the legal obligations are part of the laws of another country and have not been integrated into the United Kingdom's legal framework, we have a legitimate interest in complying with these obligations.

Disclosure of your information to our business clients, partners and affiliates

We share personal data with third party business clients, partners and affiliates (or other third parties) when this is necessary to provide our Services to our clients or where this is necessary to perform a contractual obligation to our client in relation to a Service that you have requested. Examples of third parties to whom we

may disclose personal data for this purpose are banks and payment providers when we provide payment processing services.

Legal basis for processing: legitimate interests (Article 6(1)(f) UK GDPR).

Legitimate interest(s): to provide services to you or our client and perform our contractual obligations to that client.

How long we retain your information

This section sets out how long we retain your information. We have set out specific retention periods where possible. Where that has not been possible, we have set out the criteria we use to determine the retention period.

Retention periods

Server log information: we retain information on our server logs for 7 years.

Correspondence and enquiries: when you make an enquiry or correspond with us for any reason, whether by email or via our contact form or by phone, we will retain your information for as long as it takes to respond to and resolve your enquiry, after which point we will delete your information.

Identity account and personal information: when you register on one of our **Services** your information will be retained until you ask us to delete your account. When we delete your account, we will retain your email account against a deleted account for 7 years for security reasons.

Audit records: your activity information including IP addresses in respect of activities (including identity management) will be retained for 7 years for security reasons even if you delete your account.

Where we are providing Services to you on behalf of a third party (including Integrators) retention periods may vary in accordance with our clients/the Integrators instructions. If you have any queries relating to data retention you should contact your supplier or the integrator directly.

Criteria for determining retention periods

In any other circumstances, we will retain your information for no longer than necessary, taking into account the following:

- the purpose(s) and use of your information both now and in the future (such as whether it is necessary to continue to store that information in order to continue to perform our obligations under a contract with you or to contact you in the future);
- whether we have any legal obligation to continue to process your information (such as any record-keeping obligations imposed by relevant law or regulation);
- whether we have any legal basis to continue to process your information (such as your consent);
- how valuable your information is (both now and in the future);
- any relevant agreed industry practices on how long information should be retained;
- the levels of risk, cost and liability involved with us continuing to hold the information;
- how hard it is to ensure that the information can be kept up to date and accurate; and
- any relevant surrounding circumstances (such as the nature and status of our relationship with you).

How we secure your information

We take appropriate technical and organisational measures to secure your information and to protect it against unauthorised or unlawful use and accidental loss or destruction, including:

- only sharing and providing access to your information to the minimum extent necessary, subject to confidentiality restrictions where appropriate, and on an anonymised basis wherever possible;
- using secure servers to store your information that is encrypted;
- verifying the identity of any individual who requests access to information prior to granting them access to information;
- using Secure Sockets Layer (SSL) software to encrypt any information submitted to us via any means;
- only transferring your information via closed system or encrypted data transfers;

Transmission of information to us by email or via the internet

Transmission of information over the internet is not entirely secure, and if information submitted to us over the internet (whether by email, via our website or any other means), you do so entirely at your own risk.

We cannot be responsible for any costs, expenses, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of your decision to transmit information to us by such means.

Transfers of your information outside the UK

Information which is stored by us is stored in the following countries: the United Kingdom, Ireland, Slovenia, Switzerland, India.

The Services which we provide are provided globally. Personal data may be transferred to Dataflexnet clients, affiliates, business partners, Integrators and other data processors in the United States and elsewhere in the world. Where your data is transferred outside of the UK such transfers will only take place where appropriate safeguards are in place for the transfer, such as:

- the country has been deemed by the Secretary of State to have an adequate level of protection of personal data;
- the country has not been deemed by the Secretary of State to have an adequate level of protection of personal data, but we provide appropriate safeguards for the transfer through the use of standard clauses made by the ICO under the Data Protection Act 2018, or any other contractual agreement approved by the ICO;
- where we are transferring personal data to third parties based in the US, such third party participates in the Privacy Shield.

Links to third party websites

Our Services may link to third party websites. These websites operate independently from our Sites and may have their own privacy policies. If any linked website is not owned or controlled by us, we are not responsible for its content, any use of the website or the privacy policies of the operator of that website.

Your rights in relation to your information

Subject to certain limitations on certain rights, you have the following rights in relation to your information, which you can exercise by writing to us.

- **to request access to your information** and information related to our use and processing of your information;
- **to request the correction or deletion** of your information;
- **to request that we restrict our use** of your information;
- **to receive information which you have provided to us in a structured, commonly used and machine-readable format** (e.g. a CSV file) and the right to have that information transferred to another data controller (including a third party data controller);
- **to object to the processing of your information for certain purposes** (for further information, see the section below entitled [Your right to object to the processing of your information for certain purposes](#)); and
- **to withdraw your consent to our use of your information** at any time where we rely on your consent to use or process that information. Please note that if you withdraw your consent, this will not affect the lawfulness of our use and processing of your information on the basis of your consent before the point in time when you withdraw your consent.
- **the right not to be subject to a decision based solely on automated processing, including profiling which produces legal affects concerning you or similarly significantly affects you.**

We USUALLY charge NO fee for you to exercise these rights. We will respond initially as soon as possible but no later than four weeks after receiving the request.

In accordance with Article 77 UK GDPR, you also have the right to lodge a complaint with the ICO, the contact details of which are available here: <https://ico.org.uk/global/contact-us/>.

Further information on your rights in relation to your personal data as an individual

The above rights are provided in summary form only and certain limitations apply to many of these rights. For further information about your rights in relation to your information, including any limitations which apply, please visit the following pages on the ICO's service:

- <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/> and
- <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

Verifying your identity where you request access to your information

Where you request access to your information, we are required by law to use all reasonable measures to verify your identity before doing so.

These measures are designed to protect your information and to reduce the risk of identity fraud, identity theft or general unauthorised access to your information.

How we verify your identity

Where we possess appropriate information about you on file, we will attempt to verify your identity using that information.

If it is not possible to identify you from such information, or if we have insufficient information about you, we may require original or certified copies of certain documentation in order to be able to verify your identity before we are able to provide you with access to your information.

We will be able to confirm the precise information we require to verify your identity in your specific circumstances if and when you make such a request.

Your right to object to the processing of your information for certain purposes

You have the right to object to us using or processing your information where we use or process it in order to **carry out a task in the public interest or for our legitimate interests**, including 'profiling' (i.e. analysing or predicting your behaviour based on your information) based on any of these purposes. You can object by writing to us.

Sensitive personal information

'Sensitive personal information' is information about an individual that reveals their racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic information, biometric information for the purpose of uniquely identifying an individual, information concerning health or information concerning a natural person's sex life or sexual orientation.

We do not knowingly or intentionally collect sensitive personal information from individuals, and you must not submit sensitive personal information to us.

If, however, you inadvertently or intentionally transmit sensitive personal information to us, you will be considered to have explicitly consented to us processing that sensitive personal information under Article 9(2)(a) UK GDPR. We will use and process your sensitive personal information for the purposes of deleting it.

Changes to our Privacy Policy

We update and amend our Privacy Policy from time to time to reflect changes in our privacy policies, our business or as required by law.

Minor changes to our Privacy Policy

Where we make minor changes to our Privacy Policy, we will update our Privacy Policy with a new effective date stated at the beginning of it. Our processing of your information will be governed by the practices set out in that new version of the Privacy Policy from its effective date onwards.

Major changes to our Privacy Policy or the purposes for which we process your information

Where we make major changes to our Privacy Policy or intend to use your information for a new purpose or a different purpose than the purposes for which we originally collected it, we will notify you by email (where possible) or by posting a notice on our Services.

We will provide you with the information about the change in question and the purpose and any other relevant information before we use your information for that new purpose.

Wherever required, we will obtain your prior consent before using your information for a purpose that is different from the purposes for which we originally collected it.

Children's Privacy

Because we care about the safety and privacy of children online, we comply with the Children's Online Privacy Protection Act of 1998 (COPPA). COPPA and its accompanying regulations protect the privacy of children using the internet. We do not knowingly contact or collect information from persons under the age of 18. The Services are not intended to solicit information of any kind from persons under the age of 18.

It is possible that we could receive information pertaining to persons under the age of 18 by the fraud or deception of a third party. If we are notified of this, as soon as we verify the information, we will, where required by law to do so, immediately obtain the appropriate parental consent to use that information or, if we are unable to obtain such parental consent, we will delete the information from our servers. If you would like to notify us of our receipt of information about persons under the age of 18, please do so by sending an email.

California Do Not Track Disclosures

"Do Not Track" is a privacy preference that users can set in their web browsers. When a user turns on a Do Not Track signal in their browser, the browser sends a message to Services requesting that they do not track the user. For information about Do Not Track, please visit www.allaboutdnt.org.

At this time, we do not respond to Do Not Track browser settings or signals. In addition, we use other technology that is standard to the internet, such as pixel tags, web beacons, and other similar technologies, to track visitors to the Services. Those tools may be used by us and by third parties to collect information about you and your internet activity, even if you have turned on the Do Not Track signal.