

# Acturis Group Privacy Policy – May 2018

This privacy policy sets out how we use and protect any information that you give us when you use this website. We take your privacy very seriously therefore we urge you to read this policy very carefully because it contains important information about us and:

- The personal information we collect about you, as a website user
- What we do with your information, and
- Who your information may be shared with

Acturis is committed to ensuring your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this Privacy Policy.

Acturis may be required to make updates to this Privacy Policy from time to time. You should check this page regularly to ensure that you are happy with any changes. This policy is effective from 25th May 2018.

### Who are we?

In this Privacy Policy, references to 'we' or 'us' are to Acturis Limited, a company incorporated in England and Wales (registered number 3998084) whose registered office is at 100 Hatton Garden, London, EC1N 8NX and are a 'Data Controller' for the purposes of processing personal data as described in this Privacy Policy.

#### What we collect

We may collect the following information from you through your use of this website, and specifically by completing the Contact Us form:

- name and job title
- contact information including email address and telephone number
- questions, queries or feedback you leave if you contact us
- your Internet Protocol (IP) address, and details of which version of web browser you used
- information on how you use the site, using cookies and page tagging techniques

# What we do with the information we gather

We use this information to understand your needs, answer your query and get back in touch with you to respond, where appropriate. We will also store your details for internal record keeping as well as compliance with legal and regulatory requirements. Please note, where applicable, your information may be passed on to any of our group companies and/or partners.

We do not share personal information with companies, organisations and individuals outside of Acturis unless one of the following circumstances applies:

#### With your consent

We will share personal information with companies, organisations or individuals outside of Acturis when we have your consent to do so. We require opt-in consent for the sharing of any sensitive personal information.

#### With External Hosting Providers

The Acturis website and any Mobile Applications are hosted by an external website Hosting and App Store Providers. As a result, these companies and any resellers who provide user support to Acturis will have access to your information (including your email and other data). These external Hosting / App Store Providers may also be able to view statistics regarding your use of the website, as well as see any personal information you send to us.

Please refer to each Hosting and / or App Store company for their privacy policy for more information.

#### For external processing

We provide personal information to our affiliates or other trusted businesses or persons to process it on our behalf, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.

#### For legal reasons

We will share personal information with companies, organisations or individuals outside of Acturis if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:

- meet any applicable law, regulation, legal process or enforceable governmental request
- enforce applicable Terms of Service, including investigation of potential violations
- detect, prevent, or otherwise address fraud, security or technical issues and
- protect against harm to the rights, property or safety of Acturis, our users or the public as required or permitted by law

We may share non-personally identifiable information publicly and with our partners. For example, we may share information publicly to show trends about the general use of our services.

# **Security**

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place technical and organisational security measures to safeguard and secure the information we collect online. All information is stored on our secure servers which are located within the European Economic Area.

### How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then all data is removed from the system.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

### Links to other websites

Our website may contain links to other websites. Once you have left our site, we are no longer responsible for the protection and privacy of any information which you provide whilst visiting such sites. You should exercise caution and look at the Privacy Policy of any third party website before submitting any personal information to them.

# **Controlling your personal information**

You may choose to restrict the collection or use of your personal information in the following ways:

- when completing the 'contact us' form on the website, click to indicate that you do not want the information to be used for direct marketing purposes
- you can also object to the processing of your personal information by us at any time and ask
  us to restrict or stop such processing by notifying us directly at info@acturis.com

We will not sell, distribute or lease your personal information to third parties unless you have consented for us to do so or are required to do so by law. We may use your personal information to send you promotional information about third parties which we think you may find interesting if you provide consent for receipt at the point of submitting your 'contact us' query.

#### **Data Retention**

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with an answer to a question you have asked or to comply with applicable legal requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

### **Contact**

You may request details of personal information which we hold about you under the EU General Data Protection Regulations. If you would like a copy of the information held on you please write to info@acturis.com. We will aim to respond to such requests without undue delay.

If you believe that any information which we hold about you is incorrect or incomplete, please email us as soon as possible, at the above email address. We will promptly investigate the issue and respond to you without undue delay to confirm any course of action that we shall take.