

## Etoso's Privacy Policy

Etoso respects your privacy and is committed to protecting your personal data.

This policy applies when you browse our site, subscribe to our newsletters, demos or use our services. It describes how we will make use of your data when you engage in the activities described above, including when you use our services. It also describes your data protection rights, including the right to object to some of the processing which we carry out. More information about your rights, and how to exercise them, is set out below.

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

### Controller

Etoso is the controller and responsible for your personal data (collectively referred to as "Etoso", "we", "us" or "our" in this privacy policy).

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us on [support@etoso.io](mailto:support@etoso.io).

### The data we collect about you

Personal data, or 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).

Type	Examples
<b>Identity Data</b>	first name, last name, username or similar identifier, title
<b>Contact Data</b>	billing address, email address and telephone numbers
<b>Financial Data</b>	bank account and payment card details

<b>Transaction Data</b>	details about payments to and from you and other details of products and services you have purchased from us
<b>Technical Data</b>	includes internet protocol (IP) address, your login data, 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
<b>Profile Data</b>	includes your username and password, your interests, preferences, feedback and survey responses
<b>Usage Data</b>	includes information about how you use our website and services
<b>Marketing and Communications Data</b>	includes your preferences in receiving marketing from us and your communication preferences

We also collect statistical data for any purpose which 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.

#### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data 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 services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time. For other purposes, providing your personal data is voluntary, but not doing so may impact the services and features we can provide.

#### **How is your personal data collected?**

We use different methods to collect data from and about you including through:

**Direct interactions:** you may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by email or otherwise, for example subscribe to our newsletters or create an account with us.

**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 data by using cookies and other similar technologies.

## How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances: where we need to perform the contract we are about to enter into or have entered into with you; where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests or a recognised legitimate interest; and where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although where the law requires it, we will get your consent before sending third party direct marketing communications to you via email or text message and before collecting certain Technical, Usage, and Marketing and Communications Data when you browse our website or use our services. You have the right to withdraw consent to marketing at any time by contacting us.

## Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records

(b) Asking you to leave a review or take a survey		updated and to study how customers use our products/services)
To enable you to complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data), including preventing, investigating, and reporting fraud, security incidents, or crime.	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation  (c) Necessary for the recognised legitimate interest to prevent, detect, or investigate a crime.
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	(a) consent (where required under law)  (b) necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	(a) consent (where required under law)  (b) necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	(a) consent (where required under law) (b) necessary for our legitimate interests (to develop our products/services and grow our business)
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## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### Promotional offers from us

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).

Where permitted by law, you will receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing.

### Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data we process for non-marketing purposes, such as to provide you with a product or service.

## Recipients

We share your personal information with the following categories of recipients:

- **Third-party service providers:** We engage other companies to provide services to us such as website hosting and maintenance, customer service, service fulfilment and maintenance, advertising and marketing partners, and payments processing services. We share your personal information with these entities to fulfil the purposes above.
- **Public bodies, law enforcement, courts, tribunals:** Where required by law, we will share your personal data with these recipients or other relevant third parties (such as

counterparties to litigation) to comply with our legal obligations, and enforce and protect our rights.

- **Corporate transaction:** In the event the business is sold or integrated with another business in the context of a sale, acquisition or other corporate transaction, your personal data will be disclosed to our advisers and any prospective purchaser.

## International transfers

We do not transfer your personal data outside the UK (Northern Ireland).

## Data retention

### How long will you use my personal data for?

We will only retain your personal data 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. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

## YOUR LEGAL RIGHTS

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data in certain circumstances. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, 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.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) 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. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: if you want us to establish the data's accuracy; where our use of the data is unlawful but you do not want us to erase it; where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer (data portability)** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. 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.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, 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.

**Significant automated decision making:** if being used, information on the logic behind these decisions must be included in this section.

You can exercise these rights by using the contact details below.

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is manifestly unfounded or excessive. Alternatively, we could 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 data (or to exercise any of your other rights). This is a security measure to ensure that personal data 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 could 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.

### **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data

about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

### **Changes to the privacy policy**

We keep our privacy policy under regular review.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **Complaints**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)) and to us. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

[You can contact our data protection officer by [support@etoso.io](mailto:support@etoso.io) .