

PRIVACY POLICY

Vatix Limited ("**we**", "**us**", "**our**") are committed to protecting and respecting your privacy.

This privacy policy ("**Privacy Policy**") and any other documents referred to herein, sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting www.vatix.com, ("**Site**") you are accepting and consenting to the practices described in this Privacy Policy.

DATA CONTROLLER

For the purpose of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, ("**GDPR**"), the Data Protection Act 2018 and any applicable national implementing laws, regulations and secondary legislation relating to the processing of personal data (together "**Data Protection Law**"), the data controller is Vatix Limited of 20 St Thomas Street, London, SE1 9RG, London, England.

LEGAL BASIS FOR PROCESSING

We collect and use the personal data described below in order to provide you with access to our Site and Services in a reliable and secure manner. We also collect and use personal data:

- For our legitimate business needs.
- To fulfil our contractual obligations to you.
- To comply with our legal obligations.

To the extent we process your personal data for any other purposes, we ask for your consent in advance or require that our partners obtain such consent.

INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following information about you:

Information you give us. You may give us information about you by filling in forms on our Site or by corresponding with us by telephone, post, email or otherwise. This includes information you provide when you register to use our Site or subscribe to use our apps or services ("**Services**"), set up an account with us, search for a product, complete survey that we use for research purposes, when you choose to receive marketing communication from us, when you use our Site or Services and when you report a problem with our Site or Services.

The information you give us may include your name, address, email address and telephone number, job title, profession, postcode, preferences and interests, financial and credit card information.

Information we collect about you. With regard to each of your visits to our Site or use of our Services we may automatically collect the following information:

- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- Information from other online accounts to which you have given us permission to collect data from within your settings or the privacy policies of these other online services. For example, this can be via social media or by choosing to send us your location data when accessing our Site from your smartphone; or it can be from the integrations and connections that you choose to install when using the Services.
- Location data, about your location when you use our Services or Site which helps us provide the Services you have contracted with us to provide to you, i.e. work protection services. We track your location using GPS, your IP address, sensor data from your devices and information about things near your device such as wi-fi access points, cell towers and Bluetooth enabled devices.

Information we receive from other sources. We may receive information about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on this Site or via the Services.

We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

COOKIES

We use cookies on our Site and within the Services to distinguish you from other users of our Site and Services. This helps us to provide you with a good experience when you browse our Site and also allows us to improve the Site and Services.

What are cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the Site. Cookies can be “persistent” or “session” cookies.

We use persistent cookies and session cookies on our Site and in the Services.

Persistent Cookies

A persistent cookie is stored on a user's device in between browser sessions which allows the preferences or actions of a user across the Site (or in some cases across different websites) to be remembered. We use persistent cookies to save your login information for future logins to the Site or Services.

Session Cookies

A session cookie allows the Site to link your actions during a browser session. We use session cookies to enable certain features of the Site and Services, to better understand how you interact with the Site and Services and to monitor aggregate usage by users and web traffic routing on the Site. Unlike persistent cookies, session cookies are deleted from your computer when you log off from the Site or Services and then close your browser.

Which cookies we use and why

The table below explains the cookies we use and why we use each of them.

Cookie	Type	Purpose
Necessary Cookies	Required for operation of the Site	These are cookies that are required for the operation of our Site. They include, for example, cookies that enable you to log into secure areas of our Site, use a shopping cart or make use of e-billing services.
ed_accept_cookies	Functionality Cookies	These cookies store information regarding user consent on loading specific features which then set third party cookies e.g. YouTube videos. This consent is requested on the first time the user loads a page which uses a relevant feature. It is then stored for reference during future visits to the Site.
Analytics	Tracking cookies	These cookies are used to collect information about how visitors use our Site. We use the information to compile reports and to help us improve the Site. The cookies collect information in an anonymous form, including the number of visitors to the Site, where visitors have come to the Site from and the pages they visited. If you do not allow these cookies we will not be able to include your visit in our statistics. We use Google Analytics cookies and Hotjar cookies for this purpose.

		For our use of Google Analytics you can read the full Google Analytics privacy policy at: http://www.google.com/policies/privacy/ .
Anonymous Analytics	Analytics cookies.	We use analytics cookies to tell us whether you have visited the Site previously, and to gather statistics about visits to a page.
Geotargeting	Location cookies	These cookies are used by software which tries to work out what country you are in from information supplied by your browser when it requests a web page. This cookie is completely anonymous and is only used to help target content.
Registration	Signin cookies	When you sign in, we generate cookies that let us know whether you are signed in or not. Our servers use these cookies to work out which account you are signed in with.
Site Performance	Preference cookies	We use site performance cookies to remember preferences you may have set on our Site. This enable us to personalise content for you, greet you by name and remember your preferences (for example your choice of language or region). The cookie preferences are stored to retain visitor choices in the main cookie banner. This means that the main cookie banner can be minimised on future visits, and so that analytics and advertising cookies are not set for visitors who opt out of this tracking.
ANON_ID	Targeting Cookies	These cookies record your visit to our Site, the pages you have visited and the links you have followed. We will use this information to make our Site and the advertising displayed on it more suitable to your interests. We may also share this information with third parties for this purpose. The anonymous hashed id in the cookie links the web user & apos;s browser to a profile which contains the behaviours the user has displayed.
Session ID	Session Cookies	A session cookie is required to follow your progress through the Site. It is essential to ensure that any information you enter or routes you take are remembered by the Site. Without this cookie, every page you visited would treat you as a completely new visitor. This cookie does not identify you personally and is not linked to any other information we store about you.
Google reCaptcha	Antispam Cookie	These are essential cookies, used by the Google reCAPTCHA service used in our forms to stop submissions from spammers.

You can set up your browser options, to stop your computer accepting cookies or to prompt you before accepting a cookie from the websites you visit. If you do not accept cookies, however, you may not be able to use the whole of the Site or all functionality of the Services.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org or www.allaboutcookies.org. To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

USES MADE OF THE INFORMATION

We use information held about you in the following ways.

Information you give to us. We will use this information:

- To carry out our obligations arising from any contracts entered into between you and us;
- For internal record keeping;
- To provide you with the information, products and services that you request from us;
- To notify you about changes to our Site and Services;
- To ensure that content from our Site and Services is presented in the most effective manner for you and for your computer.
- To provide you via email, telephone fax or post with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired, about unless you have opted not to receive such information;
- To permit selected third parties to contact you by electronic means only if you have consented to this by ticking the relevant consent box situated on the form on which we collected your data;

Information we collect about you. We will use this information:

- To administer our Site and Services and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- To inform you about scheduled Service downtimes and new features;
- To improve our Site and Services to ensure that content is presented in the most effective manner for you and your computer;
- To allow you to participate in interactive features of our service, when you choose to do so;
- As part of our efforts to keep our Site and Services safe and secure;

- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- To make suggestions and recommendations to you and other users of our Site or Services about our goods or services that may interest you or them.

Information we receive from other sources. We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

We will not sell or rent your personal data to anyone.

DISCLOSURE OF YOUR INFORMATION

Information we share with third parties. We may share your information with selected third parties including:

- Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006 if necessary for the delivery of Services.
- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you, for example: agents, professional advisers, third party service providers, payment processing providers, to ensure prompt delivery of Services to you, in particular where any part of our Services are provided to you by such third parties on our behalf.
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 250 men aged over 25 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women living in London). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.
- Analytics and search engine providers that assist us in the improvement and optimisation of our Site and Services.
- Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

Information we disclose to third parties. We may disclose your personal data to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.

- If we or a member of our group of companies or substantially all of their assets are acquired by a third party, in which case personal data held by them about their customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our contractual rights and/or any other agreements; or to protect our rights, property, safety, our customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

WHERE WE STORE YOUR PERSONAL DATA

Our Services are global and your information (including personal data) may be stored and processed in any country where we have operations or where we engage service providers, and we may transfer your information to countries outside of your country of residence, which may have data protection rules that are different from those of your country of residence.

The personal data that we collect from you may therefore be transferred to, and stored at, a destination outside the European Economic Area ("**EEA**"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers or partners. Such staff or subcontractors may be engaged in, among other things, the fulfilment of your order, the processing of your payment details or the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing outside of the EEA.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy. In particular, this means that your personal data will only be transferred to a country that provides an adequate level of protection (for example, where the European Commission has determined that a country provides an adequate level of protection) or where the recipient is bound by standard contractual clauses according to conditions provided by the European Commission ("**Standard Contractual Clauses**").

Our Site and Services are accessible via the internet and may potentially be accessed by anyone around the world. Other users may access the Site or Services from outside the EEA. This means that where you chose to post your data on our Site or within the Services, it could be accessed from anywhere around the world and therefore a transfer of your data outside of the EEA may be deemed to have occurred. You consent to such transfer of your data for and by way of this purpose.

PROTECTION OF YOUR INFORMATION

All information you provide to us is stored on our secure servers. Any credit card information or payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Site or Services, you are responsible for keeping this password confidential. We ask you not to share any password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will endeavour to protect your personal data, we cannot guarantee the security of

your data transmitted to our Site or the Services. Any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

LINKS TO OTHER WEBSITES

Our Site and Services may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

YOUR RIGHTS

You have the right under Data Protection Law, free of charge, to request:

- Access to your personal data.
- Rectification or deletion of your personal data.
- A restriction on the processing of your personal data.
- An objection to the processing of your personal data.
- A transfer of your personal data (data portability) in a structured, machine readable and commonly used format.
- A transfer of your personal data (data portability) in a structured, machine readable and commonly used format.
- Withdrawal of your consent to us processing your personal data, at any time.

You can make a request in relation to any of the above rights by contacting us as set out at the end of this Privacy Policy. We will respond to such queries within 30 days and deal with requests we receive from you, in accordance with the provisions of Data Protection Law.

MARKETING COMMUNICATIONS

Please note that where we process your personal data for marketing purposes, if you change your mind about being contacted in the future, you can also “opt out” at any time by clicking the “unsubscribe” link at the bottom of any email. Once you “opt out”, you will no longer receive any marketing emails from us. We will continue to communicate with you regarding your service billing and support via email.

We send push notifications from time to time in order to update you about any service updates, events and promotions we may be running. If you no longer wish to receive these communications, please disable these in the settings on your device.

DATA RETENTION

We retain personal data for as long as necessary for the relevant activity for which it was provided or collected. This will be for as long as we provide access to the Site or Services to you, your account with us remains open or any period set out in any relevant contract you have with us. However, we may keep some data after your account is closed or you cease using the Site or Services for the purposes set out below.

After you have closed your account or ceased using the Site, we usually delete personal data, however we may retain personal data where reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, maintain security, prevent fraud and abuse, resolve disputes, enforce our Terms and Conditions, or fulfil your request to “unsubscribe” from further messages from us.

We will retain de-personalised information after your account has been closed.

Please note: After you have closed your account or deleted information from your account, any information you have shared with others will remain visible. We do not control data that other users may have copied from the Site or Services. Your profile may continue to be displayed in the services of others (e.g. search engine results) until they refresh their cache.

COMPLAINTS

If you have any complaints about our use of your personal data please contact us as set out at the end of this Privacy Policy or contact our supervisory authority in the UK: The Information Commissioner’s Office at, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England (“ICO”).

AGE OF USERS

This Site and the Services are not intended for and shall not be used by anyone under the age of 16.

CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our Privacy Policy.

This Privacy Policy was last updated on the 2nd November, 2019 and replaces any other Privacy Policy previously applicable from this date.

CONTACT

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to:

By post: Vatix Limited, 30 Great Guildford Street. London SE1 0HS

By email: legal@vatix.com.