

Please read our privacy notice carefully as it describes our collection, use, disclosure, retention, and protection of your personal information. This notice applies to any website, application, or service which references this privacy notice. Where you provide us with your personal information in any of the ways described in paragraph 2 below, you agree that we may use it as described in this privacy notice.

## **1. Who we are**

In this privacy notice "we", "our" and "Subnetic" each mean the data controller.

The data controller is Subnetic Solutions Limited of 3 Place Farm, Wheathampstead, St. Albans, Hertfordshire, AL4 8SB (registration number 03785399).

## **2. How we collect information**

We will collect information about you and any other party whose details you provide to us when you:

2.1 register to use our websites, applications, or services (including trials); this may include your name, address, email address, and telephone number. We may also ask you to provide additional information about your business and your preferences;

2.2 place an order using our websites, applications, or services; this may include your name (including business name), address, contact (including telephone number and email address), and payment details;

2.3 complete online forms (including call back requests), take part in surveys, post on our message boards, post any blogs, enter any competitions or prize draws, download information such as white papers or other publications, or participate in any other interactive areas that appear on our website or within our application or service;

2.4 interact with us using social media;

2.5 provide your contact details to us when registering to use or accessing any websites, applications, or services we make available or when you update those details; and

2.6 contact us offline, for example by telephone, fax, SMS, email or post.

We may also collect information from your devices (including mobile devices) and applications you or your users use to access any of our websites, applications, or services (for example, we may collect the device identification number and type, location information, and connection information such as statistics on your page views, traffic to and from the sites, referral URL, ad data, your IP address, your browsing history and your web log information); we will ask for your permission before we do so. We may do this using cookies or similar technologies (as described in paragraph 6 below).

We may enhance personal information we collect from you with information we obtain from third parties that are entitled to share that information; for example, information from credit agencies, search information providers, or public sources (e.g. for customer due diligence purposes), but in each case as permitted by applicable laws.

If you intend giving us personal information about someone else, you must ensure that beforehand you have their explicit consent to do so and that you explain to them how we collect, use, disclose, and retain their personal information or direct them to read our privacy notice.

### **3. How we use your information**

You agree that we may use your information to:

- 3.1 provide any information and services that you have requested or any applications or services that you have ordered;
- 3.2 compare information for accuracy and to verify it with third parties;
- 3.3 provide any applications, products, services, and information that you have requested from us;
- 3.4 manage and administer your use of applications, products, and services you have asked us to provide;
- 3.5 manage our relationship with you (for example, customer services and support activities);
- 3.6 monitor, measure, improve, and protect our content, website, applications, and services;
- 3.7 undertake internal testing of our website, applications, systems, and services to test and improve their security and performance. In these circumstances, we would anonymise any information used for such testing purposes;
- 3.8 provide you with any information that we are required to send you to comply with our regulatory or legal obligations;
- 3.9 detect, prevent, investigate, or remediate crime, illegal or prohibited activities, or to otherwise protect our legal rights (including liaison with regulators and law enforcement agencies for these purposes);
- 3.10 contact you to see if you would like to take part in our customer research (for example, feedback on your use of our applications, products, and services);
- 3.11 deliver targeted advertising, marketing (including in-product messaging), or information to you which may be useful to you, based on your use of our applications and services;
- 3.12 deliver joint content and services with third parties which whom you have a separate relationship (for example, social media providers); and
- 3.13 provide you with location based services (for example, advertising and other personalised content), where we collect geo-location data.

We may retain information about you after the closure of your Subnetic account, if your application for a Subnetic account is declined, or if you decide not to go ahead with it. This information will be held and used for as long as permitted for legal, regulatory, fraud prevention, and legitimate business purposes.

Our website, applications (including mobile applications), and services may contain technology that enables us to:

- 3.14 check specific information from your device or systems directly relevant to your use of the websites, applications, or services against our records to make sure the websites, applications, or services are being used in accordance with our end-user agreements and to troubleshoot any problems;
- 3.15 obtain information relating to any technical errors or other issues with our website, applications, and services;
- 3.16 collect information about how you and users use the functions of the features of our website, applications, and services; and
- 3.17 gather statistical information about the operating system and environment from which you access our applications or services.

You can manage your privacy settings within your browser or our applications and services. In addition to the purposes described in this paragraph 3, we may also use information we gather to deliver targeted advertising, marketing (including in-product messaging), or information to you which may be useful, based on your use of the website, applications, or services or any other information we have about you (depending on the websites, applications, or services, you may be able to configure these features to suit your preferences). Paragraphs 5 and 6 of this privacy notice provides further details on how we will do this.

We may monitor and record our communications with you, including e-mails and phone conversations. Information which we collect may then be used for training purposes, quality assurance, to record details about our website, applications and services you order from us or ask us about, and in order to meet our legal and regulatory obligations generally.

#### Mobile data

We may obtain information through mobile applications that you or your users install on their mobile devices to access and use our website, applications or services or which you or your users use to provide other services related to that mobile application (for example, to sync information from our application or service with such mobile application). These mobile applications may be our own mobile applications or those belonging to third parties. Where the mobile application belongs to a third party, you must read that third party's own privacy notice as it will apply to your use of that third party mobile application. We are not responsible for such third party mobile applications and their use of your personal information.

Mobile applications may provide us with information related to a user's use of that mobile application and use of our applications and services accessed using that mobile application. We may use such information to provide and improve the mobile application or our own application or services. For example, activity undertaken within a mobile application may be logged.

You can configure our mobile application's privacy settings on your device but this may affect the performance of that mobile application and the way it interacts with our applications and services.

## 4. Sharing your information

We may share your information with:

4.1 Our service providers and agents (including their sub-contractors) or third parties which process information on our behalf (e.g. internet service and platform providers, payment processing providers, and those organisations we engage to help us send communications to you) so that they may help us to provide you with the applications, products, services, and information you have requested or which we believe is of interest to you;

4.2 third parties used to facilitate payment transactions, for example clearing houses, clearing systems, financial institutions, and transaction beneficiaries;

4.3 third parties where you have a relationship with that third party and you have consented to us sending information (for example social media sites or other third party application providers);

4.4 third parties for marketing purposes (e.g. our partners and other third parties with whom we work and whose products or services we think will interest you in the operation of your business activities. For example, financial services organisations (such as banks, insurers, finance providers), payment solutions providers, and software and services providers that provide business solutions);

4.5 credit reference and fraud prevention agencies;

4.6 regulators to meet Subnetic's legal and regulatory obligations;

4.7 law enforcement agencies so that they may detect or prevent crime or prosecute offenders;

- 4.8 any third party in the context of actual or threatened legal proceedings, provided we can do so lawfully (for example in response to a court order);
- 4.9 any third party in order to meet our legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts;
- 4.10 our own professional advisors and auditors for the purpose of seeking professional advice or to meet our audit responsibilities;
- 4.11 another organisation if we sell or buy (or negotiate to sell or buy) any business or assets; and
- 4.12 another organisation to whom we may transfer our agreement with you.

We may share non-personally identifiable information about the use of our website, applications, products, or services publically or with third parties but this will not include information that can be used to identify you.

## 5. Marketing

From time to time, we may use your information to contact you with details about our applications, products, and services which we feel may be of interest to you. We or they may wish to contact you for this purpose by telephone, post, SMS, or email. You have the right at any time to stop us from contacting you for marketing purposes. You may also request at any time that we do not share your information with third parties referred to in this paragraph. If you wish to exercise these rights you can do so by selecting your contact preferences at the point where you provide us with your details on our websites, applications, or services or by sending us an email to [info@subnetic.com](mailto:info@subnetic.com)

## 6. Cookies, Analytics, and Traffic Data

Cookies are small text files which are transferred from our websites, applications, or services and stored on your device. We use cookies to help us provide you with a personalised service, and also to help make our websites, applications, and services better for you.

Our cookies may be **session cookies** (temporary cookies that identify and track users within our websites, applications, or services which are deleted when you close your browser or leave your session in the application or service) or **persistent cookies** (cookies which enable our websites, applications, or services to "remember" who you are and to remember your preferences within our websites, applications, or services and which will stay on your computer or device after you close your browser or leave your session in the application or service). We use the following different types of cookies:

### Strictly necessary cookies

These are cookies which are needed for our websites, applications, or services to function properly, for example, these cookies allow you to access secure areas of our website or to remember what you have put into your shopping basket.

### Performance cookies and analytics technologies

These cookies collect information about how visitors and users use our websites, applications, and services, for instance which functionality visitors use most often, and if they get error messages from areas of the websites, applications, or services. These cookies don't collect information that identifies a visitor or user. All information these cookies collect is aggregated and therefore anonymous. We only use these cookies to improve how our website, applications, and services work.

### Functionality cookies

These cookies allow our websites, applications, and services to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts, and other parts of web pages that you can customise. They may also be used

to provide services you have asked for. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

#### **Targeting or advertising cookies**

These cookies are used to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by advertising networks with the website operators' permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.

#### **Web beacons and parameter tracking**

We also use cookies and similar software known as web beacons to count users who have visited our website after clicking through from one of our advertisements on another website or in emails and to collect details of any products or services purchased. These web beacons collect limited information which does not identify particular individuals. It is not possible to refuse the use of web beacons. However, because they are used in conjunction with cookies, you can effectively disable them by setting your browser to restrict or block cookies.

#### **IP Address and traffic data**

We keep a record of traffic data which is logged automatically by our servers, such as your Internet Protocol (IP) address, device information, the website that you visited before ours, and the website you visit after leaving our site. We also collect some site, application, and service statistics such as access rates, page hits, and page views. We are not able to identify any individual from traffic data or site statistics.

### **7. Your information**

If we hold any information about you which is incorrect or if there are any changes to your details please let us know so that we can keep our records accurate and up to date. If you would like to update your records or see a copy of the information that we hold about you, you can contact us at 3 Place Farm, Wheathampstead, St. Albans, Hertfordshire, AL4 8SB to [info@subnetic.com](mailto:info@subnetic.com)

If you withdraw your consent to the use of your personal information for purposes set out in our privacy notice, we may not be able to provide you with access to all or parts of our website, applications, and services.

We will retain your personal information for the duration of our business relationship and afterwards for as long as is necessary and relevant for our legitimate business purposes or to comply with applicable laws and regulation. Where we no longer need your personal information we will dispose of it in a secure manner (without notifying you).

### **8. Changes to our privacy notice**

We may change our privacy notice from time to time. We will always update the privacy notice on our website, so please try to read it when you visit the website (the 'last updated' reference tells you when we last updated our privacy notice).

### **9. Security and storage of information**

We will keep your information secure by taking appropriate technical and organisational measures against its unauthorised or unlawful processing and against its accidental loss, destruction, or damage. We will do our best to protect your personal information but we cannot guarantee the security of your data which is transmitted to our website, applications or services or to other website, applications, and services via an internet or similar connection. If we have given you (or you have chosen) a password to access certain areas of our websites, applications, or services please keep this password safe – we will not share this password with anyone.

If you believe your account has been compromised, please contact us at [info@subnetic.com](mailto:info@subnetic.com)

#### **10. Other sites and social media**

If you follow a link from our website, application, or service to another site or service, this notice will no longer apply. We are not responsible for the information handling practices of third party sites or services and we encourage you to read the privacy policies appearing on those sites or services.

Our websites, applications, or services may enable you to share information with social media sites, or use social media sites to create your account or to connect your social media account. Those social media sites may automatically provide us with access to certain personal information retained by them about you (for example any content you have viewed). You should be able to manage your privacy settings from within your own third party social media account(s) to manage what personal information you enable us to access from that account.

#### **11. Further information**

If you would like further information about data protection contact [info@subnetic.com](mailto:info@subnetic.com), you can visit the Information Commissioner's site at [ico.org.uk](http://ico.org.uk).