

Privacy Policy – Credosoft

Introduction

Welcome to Credosoft's privacy notice.

Credosoft respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data, tell you about your privacy rights and how the law protects you when:

- you visit our website at credosoft.com (regardless of where you visit it from) (“**Site**”);
- you purchase our risk base inspection software packages from us (“**Software**”); and
- we provide to you with our support and related services (“**Services**”).

The following are categories of individuals to whom this privacy policy applies to:

- **Customer:** means any individual, business or organisation, including their employees, agents or contractors, who is purchasing our Software or using our Services.
- **User:** means any person accessing our Site.

We reserve the right to change this privacy policy from time to time by changing it on the Site or by emailing you.

1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how we collect and process your personal data through your purchase of our Software and use of the Services, including any data you may provide through the Site when you purchase our Software or are using our Services.

The Site are not intended for children and we do not knowingly collect data relating to children.

Controller

In relation to the provision of our Software and Services, Credosoft is the controller and responsible for your personal data (collectively referred to as “Credosoft”, “we”, “us” or “our” in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights set out below. You can contact the data privacy manager by using the contact details set out below.

Contact details

Our full details are:

Credosoft Limited (UK Company Number: SC163937)

Name or title of data privacy manager: Silvia Bordoni

Email addresses: silvia.bordoni@credosoft.com

Postal address: 15 Queen Street, Edinburgh, EH2 1JE

Telephone number 0044 (0) 7826 055 330

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

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 29/06/2018.

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.

Third-party links

Our Site 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 notice of every website you visit.

2. 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). We may check the details you provide with fraud prevention agencies and share your information with them if we suspect fraud. It is important that you don't provide false, inaccurate information or impersonate another individual.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name and title.
- **Contact Data** includes billing address, residential or registered company address, email address and telephone numbers.
- **Transaction Data** includes details about payments to and from you and other details of Services you have purchased from us.
- **Technical Data** 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 the Site.
- **Profile Data** includes your unique account reference number, actions or transactions made by you with us, preferences, feedback, survey responses and other correspondence.
- **Usage Data** includes information about how you use our Site, Software and Services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us, and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Site feature or the number of Service types that are purchased. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

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 the Services). In this case, we may have to cancel delivery of the Service you have with us but we will notify you if this is the case at the time.

3. 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 and Contact by filling in forms, providing documentation or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - purchase or use our Software and Services;
 - create an account;
 - contact us to report a problem with the Site, Software or Services, or for other purposes;
 - request marketing to be sent to you; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our Site, we may automatically collect Usage Data and Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from the following parties:
 - (a) analytics providers based outside the EU; and
 - (b) search information providers.
 - Contact and Transaction Data from providers of technical, payment and delivery services.
 - Identity and Contact Data from publicly available sources, such as the electoral roll or Companies House.

4. 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 (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. 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 or User	(a) Identity (b) Contact	Performance of a contract with you
To provide the Software and Services to you including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Transaction (d) Profile	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) (c) Necessary for the legitimate interests of others (preventing fraud)
To manage our relationship with you which will include: (a) Notify you about changes to our terms, privacy policy, Software or Services (b) Ask you to leave a review or take a survey	(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 updated, study how Users and Customers use our Software and Services and to improve our Software and Services into the future)
To administer and protect our business and this Site, Software and Services (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(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 our legal obligations
To deliver relevant Site content	(a) Identity	Necessary for our legitimate interests (to

and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	study how Customers and Users use our Software and Services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our Site, Software and Services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of Customers and Users for our Software and Services, to keep our Site updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about Services or events that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our Software and Services and grow our business)
To acquire and provide references for our Software and Services	(a) Identity	Only with your fully informed, active, clear and specific consent.

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 Services and offers may be relevant for you and send to you through our marketing messages.

You will receive marketing messages 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 or unsubscribing from our marketing list.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a Service purchase, warranty registration, Service experience or other transactions.

Cookies

Our Site uses cookies to distinguish you from other users of our Site. This helps us to provide you with a good experience when you browse our Site and allows us to improve our Site. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive. We use the following cookies:

- **Strictly necessary cookies.** 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.
- **Analytical/performance cookies.** These cookies allow us to recognise and count the number of visitors and to see how visitors move around our Site when they are using it. This helps us to improve the way our Site works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our Site. This enables us to personalise our content for you and remember your preferences (for example, your choice of language or region).
- **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 relevant to your interests. We also share this information with third parties for this purpose.

For further details on the cookies, please see the table set out below.

Cookie name	Type of Cookie	Purpose of cookie
ga	Unique user cookie	Used to distinguish users
gid	Unique user cookie	Used to distinguish users
_gat	Throttles request rate	Used to throttle request rate. If Google Analytics is deployed via Google cookie will be named _dc_gtm_<property-id>.
AMP_TOKEN	Analytics/performance cookie (first party cookie)	Contains a token that can be used to retrieve a Client ID from AMP Cli possible values indicate opt-out, inflight request or an error retrieving a Client ID service.
gac<property-id>	Tracking cookie	Contains campaign related information for the user. If you have linked and AdWords accounts, AdWords website conversion tags will read th opt-out.
__utma	Unique visitor cookie	Used to distinguish users and sessions.
__utmt	Throttles request rate	Used to throttle request rate.
__utmb	Session cookie	Used to determine new sessions/visits.
__utmc	Session cookie	Not used in ga.js. Set for interoperability with urchin.js.
__utmz	Campaign cookie	Stores the traffic source or campaign that explains how the user reached your site.
__utmv	Visitor segmentation cookie	Used to store visitor-level custom variable data.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You may block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our Site. If you would like more information about cookies, we can recommend www.aboutcookies.org and

www.allaboutcookies.org as helpful resources. Both websites also provide instructions on how to reject cookies if you would like to do so.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Service providers who provide payment, marketing, IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers based within the EU who provide consultancy, banking, legal, insurance and accounting services.
- Regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances, especially in the prevention of money laundering and fraud.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

Some of our external third party suppliers are based outside the European Economic Area (“EEA”). Their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring that, where we use providers based in the US, they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the EEA and the US. For further details, see European Commission: EU-US Privacy Shield.

If there are no safeguards in place, we will only transfer your data outside of the EEA with your consent or where it is necessary for the performance of our contract with you.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances, we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

- **Access to information:** You have the right to request a copy of the information Credosoft holds about you.
- **Ensuring accuracy of information:** Credosoft wants to make sure that your personal information is accurate and up-to-date. You may ask Credosoft to correct or complete information that is inaccurate or incomplete.
- **Right to erasure:** You may have a right to erasure, which is more commonly known as the 'right to be forgotten'. This means that in certain circumstances you can require Credosoft to delete personal information held about you.
- **Ability to restrict processing:** You may also have the right to require Credosoft to restrict Credosoft's use of your personal information in certain circumstances. This may apply, for example, where you have notified Credosoft that the information Credosoft holds about you is incorrect and you would like Credosoft to stop using such information until Credosoft has verified that it is accurate.
- **Right to data portability:** You may have the right to receive personal data Credosoft holds about you in a format that enables you to transfer such information to another data controller (e.g. such as another service provider).
- **Review by an independent authority:** You will always have the right to lodge a complaint with a supervisory body, including ICO as listed above.
- **Preventing direct marketing:** Credosoft does not sell your personal data. From time to time, Credosoft may send emails containing information about new features and other news about us. This is considered direct marketing. Credosoft will always inform you if Credosoft intends to use your personal data or if Credosoft intends to disclose your information to any third party for such purposes.
- **Objecting to other uses of your information:** You may also have the right to object to Credosoft's use of your information in other circumstances. In particular, where you have consented to Credosoft's use of your personal data, you have the right to withdraw such consent at any time.

If you would like further information on how you can exercise these rights, please email us at silvia.bordoni@credosoft.com

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 clearly unfounded, repetitive or excessive. Alternatively, we may 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 may 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.