

ALDSU CONSULTANCY LTD – PRIVACY POLICY - HOW WE USE YOUR PERSONAL INFORMATION

Last Updated: 24 May 18

SUMMARY

1. With this privacy policy (the "Policy"), we want to let you know how we at ALDSU Consultancy Ltd, established in England, with the address Swallow Barn, Old Dilton, Wiltshire, UK with corporate company number ALDSU Consultancy Limited, registered in England and Wales with company number 9656733 (herein "ALDSU Consultancy Ltd", "we" or "us") promise to take care of the personal information we collect from you. This includes the information you provide us with (for example, when purchasing products or services or subscribing to our newsletter), or what we learn when having you on our site. This Policy explains which personal information we collect from you and for what reasons, how we use, store transfer such data but also how you can contact us to ask about your data and invoke your rights.
2. We only collect, use, store and transfer ("process") your personal information in accordance with applicable data protection legislation, including but not limited to the (EU) General Data Protection Regulation (2016/679) ("GDPR") and applicable national data protection legislation (hereafter "applicable law").
3. Depending on whether you are a website visitor, customer and/or a user of our Services, we will process personal information such as your contact details (email address, telephone number and postal address), your username, password(s) and payment details. We will also collect and use information about your technical equipment such as your hardware and software type and location data, and other information you provide us with, for example when you sign up for our surveys and contests.
4. We will use your personal information for different purposes. We will for example use the data to provide you with the Service you have requested, to improve our products and other Services, to predict user trends, to make recommendations based on your usage, to process payments and customize our Services to you.
5. We will engage other companies in order to fulfil our purposes and obligations as set out in this policy, and we will transfer your personal information to countries outside the EU and EEA that may not have as strict privacy legislation as where you live. We will only transfer your personal information to such countries if we are allowed to do so. When we collect personal information about you, you are entitled to the following rights under applicable law:
 - a. The right to access and rectify your personal information;
 - b. The right to object to our processing of personal information;
 - c. The right to restrict to our processing of personal information;
 - d. The right to demand us to delete your personal information; and
 - e. The right to data portability.
6. If you have any concerns as to how we use your personal information, we would kindly ask you to contact us first. However, you can always lodge a complaint with a relevant authority, specifically where you live, work or where you believe an

infringement of your rights has occurred. The relevant data protection authority in UK is the Information Commissioners Office, www.ico.org.uk.

WHAT WE PROMISE

7. We promise to keep your data safe and to not to sell your data to third parties. We promise to give you the right to access and delete your data, and to provide you with ways to manage and review your marketing choices as well as any other information (such as for example newsletters) you get from us.

WHAT IS PERSONAL INFORMATION?

8. Personal information can be any information relating to an identified or identifiable natural person. In other words, it can be any information that could allow us to identify you both directly and indirectly (like for example your name, email address, IP address, or your billing address).

PRIVACY POLICY DETAIL

9. This privacy policy (Privacy Policy) sets out the ways in which ALDSU Consultancy Ltd (by which we mean ALDSU Consultancy Limited, registered in England and Wales with company number 9656733) may use your personal data.

10. In this Privacy Policy:

- a. 'we', 'us' or 'our' means ALDSU Consultancy Ltd with which you are interacting as detailed above;
- b. 'the site' means the ALDSU Consultancy Ltd website you are visiting or engaging with; and
- c. 'you' and 'your' means you, the person engaging with us or registering or purchasing our services or visiting our site.

11. By subscribing to our services, purchasing our products, visiting our site or otherwise interacting with us, we will process your personal data in accordance with this Privacy Policy.

12. How you can contact us:

- a. Address: FAO the CEO ALDSU Consultancy Ltd, Swallow Barn, Old Dilton Wiltshire, BA13 3RA, United Kingdom. Email: stuartrussell@aldsu.uk

13. Information we may collect about you:

- a. **Information you give us:** We collect any information you provide to us when you complete a subscription form, or provide us with your details when purchasing a product or service register an account with us, or subscribe to our mailing list. This information might include your name, address, email address, phone number, credit card information and other information relevant to a product or service that you're registering for.
- b. **Information we collect about you:** We will collect any information contained in any correspondence between you and us via contact forms on websites, and emails or telephone calls.

14. **We collect information about you visiting our website and how you use it.** This may include your IP address, geographical location, device information, browser type, referral source, length of visit, operating system, number of page views, which pages you viewed and similar information. This information may be collected by a third party website analytics service provider on our behalf and/or may be collected using cookies. We also use cookies and pixels in our emails to track delivery and open rates, the results of which are stored against your email address and profile.

15. **Information we receive from third parties:** We may collect information about you from third parties that we work closely with for the purposes of delivering to you the services that you request from us. For example, we engage third parties to deliver products or services we cannot deliver ourselves. These entities will collect information about you that we hold for the purposes of that delivery, **but only with your express permission.**

16. We may also receive information about you from third parties where you have consented to such third party sharing your information with us.

17. **How we use information about you.** We may use your information for the following purposes, depending on the relationship we have with you. Prior to submitting your personal data to us, we will provide you more specific information where necessary about how we will use your data, and link you to this privacy policy.

We use personal data to:	The purpose of this is:	The applicable legal basis:
Provide you with information that you have requested from us, in relation to products or services we provide.	We will need to use your contact details to keep you updated about the products or services you have indicated you are interested in.	By specifically requesting information from us, you are consenting to us using your personal data for the purposes of communicating such information to you.
For general Invoices, for example to purchase a Titan Vanguard License.	<p>We will need to use your details for planning and logistics, to invoice you, to provide you customer service in relation to the product or service, and general administration related to the purchase.</p> <p>Please note that we may also share your personal data with the third party providing the product or service for this purpose.</p>	Where you have provided us a Purchase Order (PO), we need to use your personal data in this way to perform our contractual obligations to you.

<p>To keep in contact with you about products or services of ours that may be of interest to you, or for research purposes after you have purchased or used a product or service.</p>	<p>To keep you up to date on products or services you have previously purchased from us in the past. To analyse the effectiveness of our products or services and offerings to you.</p>	<p>It is our legitimate interest to keep you up to date on similar products or services you have used in the past. Where we rely on legitimate interests in this way, we will always offer an opt out, and unsubscribe option on any marketing information we send you.</p>
<p>Pass on your contact details to our suppliers or partners to ensure contract compliance.</p>	<p>We engage suppliers and partners in order to ensure we are able to deliver the contracted products or services.</p>	<p>Where we need to share these details with such suppliers and partners in order to perform the contract we have with you, the legal basis would be the performance of a contract.</p>
		<p>In other circumstances, we have a legitimate interest to provide the details to our partners, because these services are required for a seamless business experience, and it is in your interest to be provided with this information. If you prefer us not to share these details with our partners, you can us indicate using the opt out box when you register your details, or let us know during the contracting process.</p>
<p>Analyse user traffic to measure use of our websites and improve their content.</p>	<p>We may use information such as your IP address for analytical purposes of our pages, this could also include improving the content of our websites and services.</p>	<p>We have identified web analytics as a legitimate interest of our business, and allow us to better meet your needs as a customer.</p>
<p>To comply with or abide by legal obligations or requirements.</p>	<p>We may need to use or process your personal data to comply with some legal requirements, an example being health and safety or fire safety if</p>	<p>Where we need to process your data for these reasons, the legal basis will be compliance with a legal obligation.</p>

	you visit us.	
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You can find out more information on the privacy notice provided at the time you submit your data to us or in your contract with us (if applicable).

18. **Who we might share your data with.** In certain circumstances we may share your personal information with:

- a. Suppliers & Partners. Selected third parties that we work with, where necessary for the purposes of delivering to you products or services that you request from us. For example, when you provide a PO for a product, we may need to share your information with third party sub-contractors, service providers or other entities. Where we use such third parties, we enter contracts which ensure that the third party is obligated to provide at least the same level of data protection as ALDSU Consultancy Ltd entering into that contract, and we take reasonable, appropriate steps to ensure that the contractor effectively processes the personal data in a manner consistent with this Privacy Policy and our internal policies relating to the protection of Personal Data.
- b. Any other selected third party that you consent to our sharing your information with for marketing purposes (such consent will be sought prior to our sharing of this data).
- c. Any other third parties where necessary to enable us to enforce our legal rights, or to protect the rights, property or safety of our employees or where such disclosure may be permitted or required by law.

COOKIES

19. We use cookies to ensure that you get the most out of our site. Cookies are small text files, which we store on the device you use to access the site. Cookies allow us to monitor your use of the software and simplify your use of the site. For example, a temporary cookie is also used to keep track of your "session". Without that temporary cookie (which is not stored after you quit your browser) you would have to log on every time you access a new page.

If you do not wish for cookies to be installed on your device, you can change the settings on your browser or device to reject cookies. For more information about how to reject cookies using your internet browser settings please consult the "Help" section of your internet browser (or alternatively visit <http://www.aboutcookies.org>). Please note that, if you do set your Internet browser to reject cookies, you may not be able to access all of the functions of our websites.

THIRD PARTY CONTENT, SITES AND CONTRIBUTIONS

20. Some of our websites may contain content and links to other websites or apps that are operated by third parties. We don't control these third party websites or apps (including whether or not they store cookies) and this Privacy Policy does not apply to them. Please consult the terms and conditions and Privacy Policy of the relevant third party website or app to find out how that site/app collects and uses your information and to establish whether and for what purpose they use cookies.

21. **How we look after your data and how long we keep it for.** We use a variety of technological and operational security measures to protect your information against any unauthorised access to, unlawful use of, and modification and destruction of any personal data we store.

22. We will retain your information for as long as is necessary to provide you with the services that you have requested from us, or for as long as the law otherwise permits. Where you have not participated, attended or registered to attend or participate in one of our events, or otherwise engaged with us in four years, we will delete your data, unless we have an obligation to retain it for longer (for example for taxation purposes).

23. Transmission of information over the internet can be insecure, and although we employ measures to protect your information from unauthorised access we cannot always guarantee the security of information sent over the internet.

24. **Where we store your information.** When you are interacting with the ALDSU Consultancy Ltd website, the website is hosted within the EEA. All of the information that we collect about you will be stored either on these servers or on local company information systems within the EEA.

25. Where your information is processed outside of the EEA, we will take all steps necessary to ensure that any of your information is adequately protected and processed in accordance with this Privacy Policy, and where necessary, we put in place relevant safeguards to ensure the safe processing of your data.

YOUR RIGHTS IN RELATION TO PERSONAL DATA

26. You have the right to:

- a. Request a copy of the personal data that we keep about you, by making a request in writing to the CEO ALDSU Consultancy Ltd. Our CEO details are provided at paragraph 12 of this policy. You can ask us to provide the data in a commonly used, machine-readable format, and where we are able to; transmit this data to another organisation.
- b. Contact the CEO ALDSU Consultancy Ltd if you are concerned that any of the information we hold on you is incorrect, to have that data corrected.
- c. Contact the CEO ALDSU Consultancy Ltd to ask us to stop processing your data, or withdraw consent where we are relying on consent as the legal basis for any processing of your data.
- d. Contact the CEO ALDSU Consultancy Ltd to request that we delete your personal data.
- e. To lodge a complaint with the data protection authorities if you believe we have not complied with any applicable data protection law. In the UK, the relevant authority is the Information Commissioners Office, you can find their details at www.ico.org.uk.

CHANGES TO THIS PRIVACY POLICY

27. We may update this Privacy Policy from time to time. Updated privacy policies will be updated on the ALDSU Consultancy Ltd website, or provided to you at your request.

