### Singletrack Sidebar Privacy Policy

Effective starting: 1st May 2018

Singletrack ("We") are committed to protecting and respecting your privacy.

This policy (together with our terms of use and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. This policy is intended to help you understand:

- What information we collect about you
- How we use information we collect
- How we share information we collect
- How we store and secure information we collect
- How to access and control your information
- How we transfer information we collect internationally
- How to contact us with respect to your rights and data

For the Data Protection Act 1998 (the Act), the data controller is Singletrack, 1 Norton Folgate, London, E1 6DB

This policy only applies to our website, client portal and the Singletrack Sidebar Microsoft Plugin. If you leave our site via a link or otherwise, you will be subject to the policy of that website provider. We have no control over that policy or the terms of the website and you should check their policy before continuing to access the site.

## Information we collect from you

We collect and process the following data about you:

Information that you provide by filling in forms on our site http://singletrack.com (our site) or our client portal. This includes information provided at the time of registering to use our site, subscribing to our service or requesting further services. We may also ask you for information when you report a problem with our site.

Singletrack Systems Limited (including their respective group companies and approved third parties) may want to contact you about products, services and offers that might be of interest to you. We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.

If you contact us, we keep a record of that correspondence.

Details of your visits to our site including, but not limited to, traffic data, location data, weblogs, operating system, browser usage and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.

#### IP Addresses and Cookies

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual and we will not collect personal information in this way.

We may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. They enable us:

- To estimate our audience size and usage pattern.
- To store information about your preferences, and so allow us to customise our site according to your individual interests.
- To speed up your searches.
- To recognise you when you return to our site.
- You may refuse to accept cookies by activating the setting on your browser
  which allows you to refuse the setting of cookies. However, if you select this
  setting you may be unable to access certain parts of our site. Unless you
  have adjusted your browser setting so that it will refuse cookies, our system
  will issue cookies when you log on to our site.

### How we use information we collect

We use information held about you in the following ways:

- To ensure that content from our site is presented in the most effective manner for you and for your computer.
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- To carry out our obligations arising from any contracts entered between you and us.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our service.
- Your personal information shall not be used for any other purposes.

### How we share information we collect

We may disclose your personal information to third parties:

If we are under a duty to disclose or share your personal data to comply with any legal obligation. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## How we store and secure information we collect

Personal information is stored in our secure CRM system. Information is stored for a maximum of 7 years from point of last contact. If you sign up for our client portal, we will store your name, work email and an encrypted, salted hash of your portal password in our portal database. No other personal information is stored on the portal.

### How to access and control your information

Under the GDPR (<a href="https://www.eugdpr.org/">https://www.eugdpr.org/</a>) you have the following rights (<a href="https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/">https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/</a>):

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling.

If you wish to exercise any of these rights in relation to your information, please contact <a href="mailto:dpo@singletrack.com">dpo@singletrack.com</a>.

# How we transfer information we collect internationally

Singletrack uses data processors that can be based outside of the EU. For each non-EU processor we have a signed data processing agreement which contains standard data protection clauses ("EU Model Clauses").

# How to contact us with respect to your rights and data

Please contact <a href="mailto:dpo@singletrack.com">dpo@singletrack.com</a>.

## Changes to Our Privacy Policy

We may change this privacy policy from time to time. When such a change is made we will post a revised version on the Website. It is your responsibility to view this privacy policy from time to time to be aware of any such change. Your continued use of the Website will indicate your agreement to any such change.