

ATHEON ANALYTICS PRIVACY POLICY

Welcome to Attheon Analytics' privacy policy.

1 WHAT THIS POLICY COVERS

We respect your privacy and are committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data and how the law protects you.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

We keep our privacy policy under regular review. This version was last updated on **20 May 2019**.

2 WHO WE ARE

Attheon Analytics Ltd is the data controller and responsible for your personal data (collectively referred to as "**we**", "**us**" or "**our**" in this privacy policy).

If you have any questions about this privacy policy or our privacy practices, please contact us in the following ways:

Email address: **privacy@attheon.co.uk**

3 POSTAL ADDRESS: ATHEON ANALYTICS LTD, CRANFIELD INNOVATION CENTRE, UNIVERSITY WAY, CRANFIELD, BEDS. MK43 0BTHOW YOU CAN MAKE A COMPLAINT

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 (<https://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.

4 WHAT DATA WE COLLECT ABOUT YOU

Personal data 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 process the following personal data about you: name, work email address, service password(s), telephone number(s), employer name, job title, SKUtrak usage patterns and any correspondence between us.

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 goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

Please inform us of changes in your data

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.

5 HOW WE COLLECT YOUR PERSONAL DATA

We use different methods to collect data from and about you including when you:

- create an account with us on our SKUtrak service;
- order our products or services;
- request marketing material to be sent to you;
- give us feedback or contact us.

6 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 obligation**.
- Where you have given us **consent**.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways in which we plan to use your personal data, and which of the legal bases we rely on to do so.

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	Lawful basis for processing
To register you on the SKUtrak service	<ul style="list-style-type: none">• To perform a contract with you
To provide services to you	<ul style="list-style-type: none">• To perform a contract with you
To collect and recover money owed to us	<ul style="list-style-type: none">• To pursue our legitimate interest
To manage our relationship with you	<ul style="list-style-type: none">• To perform a contract with you• To comply with a legal obligation

To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> • To pursue our legitimate interests • To comply with a legal obligation
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> • To pursue our legitimate interests

Promotional offers

We may use your 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 products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing.

Third-party marketing

We will obtain your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time via **privacy@attheon.co.uk**.

Cookies

Our websites and the SKUtrak service use cookies. A cookie is a small file of letters and numbers that we put on your computer if you agree. These cookies allow us to distinguish you from other users of our website, which helps us to provide you with a good experience when you browse our website and also allows us to improve our site. [The cookies we use are "analytical" cookies. They allow us to recognise and count the number of visitors and to see how visitors move around the site when they are using it. This helps us to improve the way that SKUtrak works, for example by ensuring that users are finding what they are looking for easily.]

7 WITH WHOM WE MAY SHARE YOUR PERSONAL DATA

We may share your personal data with the parties set out below:

- **Service providers:** these are companies or persons who host our customer data in the UK or provide IT and system administration services to us.
- **Professional advisers:** including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services to us.

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.

8 WHERE YOUR DATA WILL BE LOCATED

We will not transfer your personal data to countries outside UK and European Economic Area (**EEA**).

9 HOW WE KEEP YOUR DATA SAFE

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.

10 FOR HOW LONG WE WILL USE YOUR DATA

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

We keep basic information about our customers for six years after they cease being customers for tax purposes and to be able to respond to any legal claims that are served with the six year limitation.

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, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see **your legal rights** below for further information.

In some circumstances we will 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.

11 YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at privacy@attheon.co.uk.

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 could 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 could 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.