

# **Privacy Policy (Customers)**

We are Mobilise Cloud Services Limited. We are committed to protecting and respecting your privacy. This policy sets out the basis on which any personal data we collect will be processed by us. Please read this privacy policy carefully to understand our views and practices and your rights regarding your personal data. By visiting http://www.mobilise.cloud (our site) your personal information will be processed as described in this policy.

For the purpose of data protection legislation, the data controller is Mobilise Cloud Services Limited of Trafalgar House, Fitzalan Place, Cardiff, Wales, CF24 0ED.

This policy is overseen by the COO. If you have any queries, complaints or requests please contact info@mobilise.cloud.

# What information do we collect from you?

We will collect and process the following data about you:

- Information you give us: This is information about you that you give us by filling in forms on our site or by corresponding with us by phone, email or otherwise. The information you give us may include your name, address, email address, password, job title, phone number, financial information, information obtained through imagery (such as CCTV or other recorded imagery) and biometric data (such as fingerprinting)
- Information we collect from your use of our site: With regard to each of your visits to our site we will automatically collect the following information:
  - technical information, such as the Internet protocol (IP) address used to connect your device to the Internet, whereabouts you connected to our service, your internet service provider (ISP), and what type of device you are using to access our service; and
  - o personal information you disclose when using our live chat on our website
- Information we collect throughout our relationship: This is information relating to the provision of our products and services
- Information we collect when you call us: If you call us we will automatically collect the following information:
  - o the phone number used to call us
  - o any personal data disclosed on the call
  - a recording of all inbound and outbound calls
- Information we receive from other sources: We are working closely with other organisations, including:
  - marketing list providers
  - o social media
  - business partners, subsidiaries, suppliers and sub-contractors
- Providing us with your details online: This is information you may choose to provide us with using the https://www.mobilise.cloud/contact-us/page on our site. It includes your name, telephone number and email address. Please let us know if any of this information changes so we can keep our records up to date.



# Why do we collect this information?

We process your personal information for the following reasons:

- Pursuant to a contract in order to:
  - process information at your request to take steps to enter into a contract
  - o provide you with our products and services
  - o process payments
  - o make deliveries
  - maintain business and service continuity
  - send service communications (by email, post or, if the circumstances require it, by phone) so that you receive a full and functional service and so we can perform our obligations to you, including notifications about changes to our service
  - record information to facilitate your rights under guarantee.
- On the basis of your consent:
  - where we rely on your consent for processing this will be brought to your attention when the information is collected from you, including using biometric information
  - we will only contact you with direct marketing communications if you consent to us doing so and you have the right to withdraw consent at any time (see the What are your rights? section below for more information)
- In our legitimate interests of providing the best service and improving and growing our business we will process information in order to:
  - o provide you with a personalised service
  - o improve our products and services
  - o keep our site and systems safe and secure
  - understand our customer base and purchasing trends
  - o defend against or exercise legal claims and investigate complaints o understand the effectiveness of our marketing

We will carry out analytics to improve our products and services and store personal information for diagnostic purposes as set out above.

You have the right to object to processing carried out for our legitimate interests. See the What are your rights? section below for more information.

- To comply with legal requirements relating to:
  - the provision of products and services o data protection
  - health and safety
  - o anti-money laundering
  - o fraud investigations
  - o assisting law enforcement
  - o any other legal obligations placed on us from time to time

How long do we keep hold of your information?



We will keep information about you for a maximum of 7 years after the end of our relationship with you unless obligations to our regulators require otherwise or we are required remove such data from our records.

We will keep telephone records for up to 6 months from the time the recording was made.

## Who might we share your information with?

For the purposes set out in the 'Why do we collect this information?' section above, we will share your personal information with any member of our group, which means our subsidiaries and the following categories of third parties, some of whom we appoint to provide services, including:

- business partners, subsidiaries, suppliers and sub-contractors for the performance of any contract we enter into with you
- analytics and search engine providers that assist us in the improvement and optimisation of our site
- auditors
- on call engineers in the case of service issues or faults
- marketing support providers, social media marketing suppliers
- customer survey providers in order to receive feedback and improve our services

Additionally, we will disclose your personal information to the relevant third party:

- in the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets
- if we are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of our customers, our regulator, or others (this includes exchanging information with other companies and organisations for the purposes of fraud protection and prevention of money laundering and credit risk reduction)

# How is your data stored and kept secure?

At Mobilise Cloud Services Limited, we take your safety and security very seriously and we are committed to protecting your personal and financial information. All information kept by us is stored on our secure servers. Where we have given you (or where you have chosen) a password that enables you to access certain parts of our service, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

We may transfer your data outside the European Economic Area ("**EEA**"). We will only do so if adequate protection measures are in place in compliance with data protection legislation. We use the following protection measures:

- transferring to Commission approved countries
- using Commission approved model contractual clauses
- requiring companies we transfer data to in USA to be signed up to certification e.g. Privacy Shield for US

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. More information is available by contacting us.



#### What are your rights?

Where processing of your personal data is based on consent, you can withdraw that consent at any time.

You have the following rights. You can exercise these rights at any time by contacting us at compliance@mobilise.cloud You have the right:

- to ask us not to process your personal data for marketing purposes. We will inform
  you (before collecting your data) if we intend to use your data for such purposes or
  if we intend to disclose your information to any third party for such purposes
- to ask us not to process your personal data where it is processed on the basis of legitimate interests provided that there are no compelling reasons for that processing
- to ask us not to process your personal data for scientific or historical research purposes, where relevant, unless the processing is necessary in the public interest
- to request from us access to personal information held about you
- to ask for the information we hold about you to be rectified if it is inaccurate or incomplete
- to ask for data to be erased provided that the personal data is no longer necessary for the purposes for which it was collected, you withdraw consent (if the legal basis for processing is consent), you exercise your right to object, set out below, and there are no overriding legitimate ground for processing, the data is unlawfully processed, the data needs to be erased to comply with a legal obligation or the data is children's data and was collected in relation to an offer of information society services
- to ask for the processing of that information to be restricted if the accuracy of that
  data is contested, the processing is unlawful, the personal data is no longer
  necessary for the purposes for which it was collected or you exercise your right to
  object (pending verification of whether there are legitimate grounds for processing)
- to ask for data portability if the processing is carried out by automated means and the legal basis for processing is consent or contract

Should you have any issues, concerns or problems in relation to your data, or wish to notify us of data which is inaccurate, please let us know by contacting us using the contact details above. In the event that you are not satisfied with our processing of your personal data, you have the right to lodge a complaint with the relevant supervisory authority, which is the Information Commissioner's Office (ICO) in the UK, at any time. The ICO's contact details are available here: <a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a>.

## Changes to our privacy policy

This policy may be updated from time to time. Please check back frequently to see any updates or changes to our privacy policy.

#### Cookies

We use cookies and similar technology to distinguish you from other users of our site. We also use cookies and similar technology in our e-mail communications. This helps us to provide you with a



good experience when you use our site or engage in e-mail communication with us and also allows us to improve our site and e-mail communication.

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you or your computer agrees, the file is added and the cookie helps us analyse website traffic and lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you or your computer agrees, the file is added and the cookie helps us analyse website traffic and lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

A cookie does not give us access to your computer or any information about you, however we are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

We use the following cookies for the following purposes:

- Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.
- Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website 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 website.
  This enables us to personalise our content for you and remember your preferences.
- Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website more relevant to your interests.

In some special cases Mobilise Cloud also use cookies provided by trusted third parties. Third party analytics are used to track and measure usage of this site so that we can continue to produce engaging content. These cookies may track things such as how long you spend on one of our websites or pages you visit to help us to understand how we can improve our services for you.

Mobilise Cloud also use social media buttons and/or plugins on this site that allow you to connect with your social network in various ways. For these to work, social media sites including Facebook and Google+ will set cookies through our site which may be used to enhance your profile on their site or contribute to the data they hold for various purposes outlined in their respective privacy policies.

Mobilise Cloud also use cookies to help us improve our website's usability and for marketing purposes. We may also use cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. Mobilise Cloud only use this information for statistical purposes. Google Analytics generates statistical and other information about our websites' use by means of cookies. The information generated relating to our website is used to create reports about the usage of our websites. Google may also store and use this information. Google's privacy policy is available at: http://www.google.com/



privacypolicy.html. If you would like to opt out of being tracked by Google Analytics across all websites please visit: <a href="http://tools.google.com/dlpage/gaoptout.">http://tools.google.com/dlpage/gaoptout.</a>

You can 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 to find out more about cookies, including how to see what cookies have been set and how to manage and delete them, please visit: <a href="http://www.allaboutcookies.org">http://www.allaboutcookies.org</a>.

#### **Contact us**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Mobilise Cloud Services Limited of Trafalgar House, Fitzalan Place, Cardiff, Wales, CF24 0ED or info@mobilise cloud.co.uk.