



Asset55

Privacy Policy

v1.1

Last updated: 30th October 2018

1 Introduction

Your privacy is very important to us. Please read below as it describes our collection, use, disclosure, retention, and protection of your personal information. This policy applies to any website, application, or service that references this privacy policy. Where you provide us with your personal information in any of the ways described below, you agree that we may collect, store, and use it:

- a. in order to perform our contractual obligations to you
- b. based on our legitimate interest for processing (i.e. for internal administrative purposes or for the detection or prevention of crime)
- c. based on your consent, which you may withdraw at any time, as described in this privacy policy.

2 Who are we

Our privacy policy applies to all products, applications, and services offered by Asset55 Ltd (a company incorporated in England with company registration number 083335379 and whose registered office address is 1 Merchant Court, Monkton Business Park, Hebburn, Tyne and Wear, England, NE31 2EX), and its affiliates, but excludes any products applications or services that have separate privacy policies, which do not incorporate this privacy policy.

3 How we collect information

To the extent permissible under applicable law, we collect information about you and any other party whose details you provide to us when you:

- register to use our websites, applications or services including free trials (this may include your name, address, email address, and telephone number) - we may also ask you to provide additional information about your business and your preferences
- provide your contact details to us when registering to use or accessing any websites, applications, or services we make available or when you update those details
- contact us offline, e.g. by telephone, fax, SMS, email or post

If you intend giving us personal information about someone else, you are responsible for ensuring that you comply with any obligation and consent obligations under applicable data protections laws. In so far as required by

applicable data protection laws, you must ensure that beforehand you have their explicit consent to do so and that you explain to them how we collect, use, disclose, and retain their personal information or direct them to read our privacy policy.

4 How we use your information

Our website, applications (including mobile applications), and services may contain technology that enables us to:

- provide information and services that you have requested or any application, products, or services you have ordered
- provide, maintain, protect, and improve any application, products, or services you have ordered
- manage and administer your use of applications, products, and services you have asked us to provide
- manage our relationship with you (e.g. customer services and support activities)
- monitor, measure, improve, and protect our content, website, applications, and services, and provide an enhanced, personal user experience for you
- undertake internal testing of our website, applications, systems, and services to test and improve their security and performance (in these circumstances, we would anonymise any information used for such testing purposes)
- provide you with any information that we are required to send you to comply with our regulatory or legal obligations
- detect, prevent, investigate or remediate crime, illegal, or prohibited activities, or to otherwise protect our legal rights (including liaison with regulators and law enforcement agencies for these purposes)
- contact you to see if you would like to take part in our customer research (e.g. feedback on your use of our applications, products, and services)

Our website, applications (including mobile applications), and services may contain technology that enables us to:

- check specific information from your device or systems directly relevant to your use of the websites, applications, or services against our records to make sure the websites, applications, or services are being used in accordance with our end-user agreements and to troubleshoot any problems
- obtain information relating to any technical errors or other issues with our website, applications, and services
- collect information about how you and users use the functions of the features of our website, applications, and services
- gather statistical information about the environment from which you access our applications or services

You can manage your privacy settings within your browser or our applications, and services (where applicable).

Mobile data

We may obtain information through mobile applications that you or your users install on their mobile devices to access and use our website, applications, or services or that you or your users use to provide other services related to that mobile application (e.g. to sync information from our application or service with such mobile application).

Mobile applications may provide us with information related to a user's use of that mobile application and use of our applications and services accessed using that mobile application. We may use such information to provide and improve the mobile application or our own application or services. E.g. activity undertaken within our mobile application may be logged.

Analytics & Benchmarking

We may use information generated and stored during your use of our services for our legitimate business interests to enable us to give you the best service and / or solutions and the best experience. These purposes include to:

- carry out research and development to improve our services, products, and applications
- develop and provide new and existing functionality and services (including statistical analysis, benchmarking, and forecasting services)
- provide you with location-based services (e.g. location relevant content) where we collect geo-location data to provide a relevant experience

Whenever we use your information for our legitimate interests, we will ensure that your information is processed on a pseudonymised basis and displayed at aggregated levels, which will not be linked back to you or to any living individual.

You have the right to object to processing based on our legitimate interests, and if you wish to do so, please contact us at privacy@assetfiftyfive.com to discuss this further. If you object, this may affect our ability to provide certain services and / or solutions for your benefit.

5 Sharing your information

We may share your information with:

- our service providers and agents (including their sub-contractors) or third parties that process information on our behalf (e.g. internet service and platform providers and those organisations we engage to help us send communications to you) so that they may help us to provide you with the applications, products, services, and information you have requested
- third parties used to facilitate payment transactions, e.g. clearing houses, clearing systems, financial institutions, and transaction beneficiaries
- credit reference and fraud prevention agencies
- law enforcement agencies so that they may detect or prevent crime or prosecute offenders
- any third party in the context of actual or threatened legal proceedings, provided we can do so lawfully (for example in response to a court order)
- any third party to meet our legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts
- another organisation if we sell or buy (or negotiate to sell or buy) any business or assets
- another organisation to whom we may transfer our agreement with you; and Government departments where reporting is mandatory under applicable law

6 Marketing

From time to time, we may use your information to contact you with details about our applications, products, and services, which we feel may be of interest to you.

You have the right at any time to stop us from contacting you for marketing purposes. If you wish to exercise these rights you can do so by selecting your contact preferences at the point where you provide us with your information on our websites, applications, or services, using any preference centres we give you access to or by sending us an email to privacy@assetfiftyfive.com. You can also unsubscribe from any email marketing using the links provided in the emails we send to you.

7 Your information and rights

If you are based within the EEA or within another jurisdiction having similar data protection laws, in certain circumstances you have the following rights:

- the right to be told how we use your information and obtain access to your information
- the right to have your information rectified or erased or place restrictions on processing your information
- the right to object to the processing of your information e.g. for direct marketing purposes or where the processing is based on our legitimate interests
- the right to have any information you provided to us on an automated basis returned to you in a structured, commonly used and machine-readable format, or sent directly to another company, where technically feasible (“data portability”)
- where the processing of your information is based on your consent, the right to withdraw that consent subject to legal or contractual restrictions
- the right to object to any decisions based on the automated processing of your personal data, including profiling
- the right to lodge a complaint with the supervisory authority responsible for data protection matters (e.g. in the UK, the Information Commissioner’s Office)

If we hold any information about you that is incorrect or if there are any changes to your details, please let us know by so that we can keep our records accurate and up to date by sending us an email to privacy@assetfiftyfive.com.

If you withdraw your consent to the use of your personal information for purposes set out in our privacy policy, we may not be able to provide you with access to all or parts of our website, applications, and services.

We will retain your personal information for the duration of our business relationship and afterwards for as long as is necessary and relevant for our legitimate business purposes, in accordance with our Data Retention, Marking and Destruction Policy or as otherwise permitted by applicable laws and regulations. Where we no longer need your personal information, we will dispose of it in a secure manner (without further notice to you).

8 Changes to this privacy policy

We may change this privacy policy from time to time. However, we will not reduce your rights under this privacy policy. We will always update this privacy policy on our website, so please try to read it when you visit the website (the “Last updated” reference on the cover page of this policy tells you when we last updated this privacy policy).

9 Security and storage of information

We will keep your information secure by taking appropriate technical and organisational measures against its unauthorised or unlawful processing and against its accidental loss, destruction, or damage. We will do our best to protect your personal information, but we cannot guarantee the security of your information that is transmitted to our website, applications, or services or to other websites, applications, and services via an internet or similar connection.

If we have given you (or you have chosen) a password to access certain areas of our websites, applications, or services, please keep this password safe – we will not share this password with anyone.

If you believe your account has been compromised, please contact us at privacy@assetfiftyfive.com.

10 Transfers outside of the European Economic Area

Personal information in the European Union is protected by data protection laws but other countries do not necessarily protect your personal information in the same way.

Our website and some of our applications or services or parts of them may also be hosted in the United States or otherwise outside of the EEA (this means all the EU countries plus Norway, Iceland and Liechtenstein) ("EEA") and this means that we may transfer any information that is submitted by you through the website or the application or service outside the EEA to the United States or to other territories outside of the EEA. When you send an email to us, this will also be stored on our email servers that are hosted in the United States.

We may use service providers based outside of the EEA to help us provide our website, applications, and services to you (e.g. platform and payment providers who help us deliver our applications, and services, or advertising or execute your payments) and this means that we may transfer your information to service providers outside the EEA for providing our applications, advertising, and services to you.

We take steps to ensure that where your information is transferred outside of the EEA by our service providers and hosting providers, appropriate measures and controls in place to protect that information in accordance with applicable data protection laws and regulations. Transfers are made in accordance with the requirements of Regulations (EU) 2016 / 679 (the General Data Protection Regulations or "GDPR") and may be based on the use of the European Commission's Standard Model Clauses for transfers of personal data outside the EEA.

By using our website, products, or services or by interacting with us in the ways described in this privacy policy, you

consent to the transfer of your information outside the EEA in the circumstances set out in this privacy policy. If you do not want your information to be transferred outside the EEA you should not use our website, applications, or services.

11 Other sites and social media

If you follow a link from our website, application, or service to another site or service, this privacy policy will no longer apply. We are not responsible for the information handling practices of third party sites or services and we encourage you to read the privacy policies appearing on those sites or services.

Our websites, applications, or services may enable you to share information with social media sites or use social media sites to create your account or to connect your social media account. Those social media sites may automatically provide us with access to certain personal information retained by them about you (e.g. any content you have viewed). You should be able to manage your privacy settings from within your own third party social media account(s) to manage what personal information you enable us to access from that account.

12 Cookies, analytics and traffic data

Cookies are small text files that are transferred from our websites, applications, or services, and stored on your device. We use cookies to help us provide you with a personalised service, and to help make our websites, applications, and services better for you.

Our cookies may be session cookies (temporary cookies that identify and track users within our websites, applications, or services that are deleted when you close your browser or leave your session in the application or service) or persistent cookies (cookies that enable our websites, applications, or services to “remember” who you are and to remember your preferences within our websites, applications, or services, and that will stay on your computer or device after you close your browser or leave your session in the application or service).

We use the following different types of cookies:

Strictly necessary cookies

These are cookies that are needed for our websites, applications, or services to function properly, e.g. these cookies allow you to access secure areas of our applications.

Performance cookies and analytics technologies

These cookies collect information about how visitors and users use our websites, applications, and services, for instance, which functionality visitors use most often, and if they get error messages from areas of the websites, applications, or services. These cookies don't collect information that identifies a visitor or user. All information these cookies collect is aggregated and therefore anonymous. We only use these cookies to improve how our website, applications, and services work.

Functionality cookies

These cookies allow our websites, applications, and services to remember choices you make (such as your user name, language, or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts, and other parts of web pages that you can customise. They may also be used to provide services you have asked for. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

IP address and traffic

We keep a record of traffic data that is logged automatically by our servers, such as your Internet Protocol (IP) address, device information, the website that you visited before ours and the website you visit after leaving our site. We also collect some site, application, and service statistics such as access rates, page hits, and page views. We are not able to identify any individual from traffic data or site statistics.

Description	Purpose
Google Analytics	Google Analytics uses "cookies", to help the website analyse how users use the websites, applications or services. The information generated by the cookie about your use of the websites, applications or services (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for evaluating your use of the websites, applications or services compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may

Description	Purpose
	<p>refuse the use of cookies by selecting the appropriate settings on your browser or within the application, however please note that if you do this you may not be able to use the full functionality of this website. By using our websites, applications or services you consent to the processing of data about you by Google in the manner and for the purposes set out above. To find out more, see "How Google uses data when you use our partners' sites or apps", (located at www.google.com/policies/privacy/partners/, or any other URL Google may provide from time to time).</p> <p>To opt out of being tracked by Google Analytics across all websites visit: http://tools.google.com/dlpage/gaoptout.</p>

How to disable cookies

You may be able to configure your browser or our website, application or service to restrict cookies or block all cookies if you wish, however if you disable cookies you may find this affects your ability to use certain parts of our website, applications, or services. For more information about cookies and instructions on how to adjust your browser settings to accept, delete, or reject cookies, see the www.allaboutcookies.org/ website.

13 Further information

If you have any queries about how we treat your information, the contents of this privacy policy, your rights under local law, how to update your records or how to obtain a copy of the information that we hold about you, please write to us at Data Protection, Asset55, 1 Merchant Court, Monkton Business Park, Hebburn, Tyne and Wear, England, NE31 2EX or send an email to privacy@assetfiftyfive.com.



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