



MASTER SERVICES AGREEMENT

Privacy Policy

PUBLISH DATE: 23/04/2021

VERSION 1.0

Valto Limited



Important information and who we are

Welcome to Valto's privacy policy.

This privacy policy aims to give you information on how Valto collects, stores, uses and shares your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

When we process personal data of UK residents we are subject to the General Data Protection Regulation ((EU) 2016/679) (**UK GDPR**), the Data Protection Act 2018 (**DPA 2018**) and the Privacy and Electronic Communications Regulation (**PECR**) and when we process personal data of non-UK data subjects we are subject to the General Data Protection Regulation ((EU) 2016/679) (**EU GDPR**) and the PECR which applies across the European Union and we are responsible as 'controller' of that personal information for the purposes of those laws.

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.

Controller

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

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Contact details

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

Full name of legal entity: Valto Limited

Email address: privacy@Valto.co.uk

Postal address: 10 Watergate Row, Chester, CH1 2LD

Telephone number: 03335 779 009

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 (www.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.

Who does this privacy policy apply to?

This privacy policy applies to:

- (a) Customers;
- (b) Prospective customers;
- (c) Individuals that use our website;
- (d) Former customers; and
- (e) IT Partners.

Our services are not intended for children unless we expressly state otherwise, and we do not knowingly collect or process personal data relating to children or anyone aged under 18 years.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

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.

Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

The data we collect about you

Personal data, or personal information, 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 collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes service address, correspondence/billing address, delivery address, email address and telephone numbers (landline and mobile phone number).
- **Financial Data** includes bank account and payment card details.



- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our services.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect Special Categories of Personal Data.

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.

How is your personal data collected?

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

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - create an account on our website;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or



- give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our [cookie policy here](#) for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:

Technical Data from the following parties:

- (a) analytics providers;
- (b) advertising networks; and
- (c) search information providers.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
- Identity and Contact Data from data brokers or aggregators.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

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.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

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	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer and verify your identity when you use our services or contact us	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To monitor, record, store and use any telephone, email or other electronic communications with you for training purposes, so that we can check any instructions given to us and to improve the quality of our customer service, and in order to meet our legal and regulatory obligations	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Profile (f) Marketing and Communications	(a) Necessary for our legitimate interests (b) Necessary to comply with a legal obligation
To manage our relationship with you which will include: (a) Notifying you about changes to our website, services, terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact	(a) Performance of a contract with you

	<ul style="list-style-type: none"> (c) Profile (d) Usage (e) Marketing and Communications 	(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Technical 	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
To deliver relevant content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical 	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> (a) Technical (b) Usage 	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications 	Necessary for our legitimate interests (to develop our products/services and grow our business)
Conducting checks to identify our customers and verify their identity	<ul style="list-style-type: none"> (a) Identity (b) Contact Data 	To comply with our legal and regulatory obligations

<p>Screening for financial and other sanctions or embargoes</p> <p>Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety regulation or rules issued by our professional regulator</p>		
<p>Gathering and providing information required by or relating to audits or quality checks, e.g. the audit of our accounts, enquiries or investigations by regulatory bodies</p>	<p>(a) Identity (b) Contact Data (c) Financial (d) Transaction</p>	<p>(a) To comply with our legal and regulatory obligations</p> <p>(b) Necessary for our legitimate interests or a those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards</p>
<p>Ensuring business policies are adhered to, e.g. policies covering security and internet use</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you</p>
<p>Ensuring the confidentiality of commercially sensitive information</p>	<p>(a) Identity (b) Contact Data (c) Financial (d) Transaction (e) Technical (f) Profile</p>	<p>(a) Necessary for our legitimate interests or those of a third party, i.e. to protect trade secrets and other commercially valuable information</p> <p>(b) To comply with our legal and regulatory obligations</p>
<p>Preventing unauthorised access and modifications to systems</p>	<p>(a) Technical (b) Usage</p>	<p>(a) Necessary for our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you</p> <p>(b) To comply with our legal and regulatory obligations</p>
<p>Statutory returns</p>	<p>a) Identity (b) Contact Data (c) Financial</p>	<p>To comply with our legal and regulatory obligations</p>

	(d) Transaction	
Ensuring safe working practices, administration staff and assessments	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	(a) To comply with our legal and regulatory obligations (b) Necessary for our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
Marketing our services and those of selected third parties to: —existing and former customers; —third parties who have previously expressed an interest in our services; —third parties with whom we have had no previous dealings.	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests or those of a third party, i.e. to promote our business to existing and former customers
Credit reference checks via external credit reference agencies	(a) Identity (b) Contact Data	Necessary for our legitimate interests or those of a third party, i.e. to ensure our customers are likely to be able to pay for our products and services



Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile 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 goods or services from us and you have not opted out of receiving that marketing.

Third-party marketing

We will get 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 contacting us at any time or by following the opt-out links on any marketing message sent to you.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see [cookie policy here](#).

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible



with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

We routinely share personal data with:

- third party suppliers who help us to perform our services;
- other third parties we use to help us run our business; namely our marketing agency Mailchimp based in the United States and Datto based in the EEA;
- third parties approved by you, e.g. social media sites you choose to link your account to or third-party payment providers;
- credit reference agencies;
- our insurers and brokers;
- our bank;

We only allow our service providers to handle your personal data if we are satisfied, they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers relating to ensure they can only use your personal data to provide services to us and to you. We may also share personal data with external auditors, e.g. in relation to accreditation and the audit of our accounts.

We may disclose and exchange information with law enforcement agencies and regulatory bodies such as Ofcom or the Information Commissioner's Office, to comply with our legal and regulatory obligations.

We may also need to share some personal data with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, data will be anonymised, but this may not always be possible. The recipient of the data will be bound by confidentiality obligations.

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.

Where your personal data is held



Data may be held at our offices and those of our group companies, third party agencies, service providers, representatives and agents as described above (see above: '**Disclosures of your personal data**').

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal data when this occurs, see below: '**Transferring your personal data out of the UK and EEA**'.

How long your personal data will be kept

We will keep your personal data for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law.

We will not retain your personal data for longer than necessary for the purposes set out in this notice. Different retention periods apply for different types of personal data.

When it is no longer necessary to retain your personal data, we will delete or anonymise it.

Transferring your personal data out of the UK and EEA

To deliver services to you, it is sometimes necessary for us to share your personal data outside the UK and/or European Economic Area (EEA), e.g.:

- with your and our service providers located outside the UK/EEA;
- if you are based outside the UK/EEA.

These transfers are subject to special rules under European and UK data protection law. This means we can only transfer your personal data to a country or international organisation outside the UK/EEA where:

- the European Commission has issued an 'adequacy decision' in relation to that country or international organisation; or
- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for data subjects; or
- a specific exception applies under data protection law

European Union (EU) data protection rules apply to the European Economic Area (EEA), which includes all EU countries and non-EU countries of Iceland, Liechtenstein and Norway. Valto is located in the United Kingdom, our data processors that are assisting us in processing personal data, are located within the EEA and the United States.

The UK and the EU agreed a Trade and Cooperation Agreement effective from 1 January 2021. This

agreement provides for an interim period of up to six months where personal data can be transferred from the EEA to the UK and not be seen as a transfer to a third country. Essentially, the same position on transfers that applied during the Brexit transition period which is being preserved on an interim basis whilst a UK adequacy decision is considered.

In relation to UK and EEA transfers, the UK has already announced that it will initially treat the EEA countries as adequate for the purpose of UK to EEA transfers, but that this will be kept under review.

Further transfer mechanisms are explained below.

[European Commission adequacy decision](#)

The European Commission has the power to determine whether a country or international organisation provides an adequate level of protection for personal data and, if it does, to issue an 'adequacy decision'.

It can take several years for the European Commission to issue an adequacy decision and only a small number of countries currently benefit from one.

This does not necessarily mean they provide inadequate protection for personal data, but we must look at alternative grounds for transferring the personal data, such as implementing safeguards or relying on an exception, as explained below.

[Transfers with appropriate safeguards](#)

We may transfer your data to a third country on this ground where we are satisfied the transfer complies with data protection law, appropriate safeguards are in place, and enforceable rights and effective legal remedies are available for data subjects.

The safeguards will usually include using standard data protection contract clauses approved by the European Commission.

[Transfers under an exception](#)

In the absence of an adequacy decision or appropriate safeguards, we may transfer personal data to a third country or international organisation where an exception applies under relevant data protection law, e.g.:

- you have explicitly consented to the proposed transfer after having been informed of the possible risks;
- the transfer is necessary for the performance of a contract between us or to take pre-contract measures at your request;
- the transfer is necessary for a contract in your interests, between us and another person; or
- the transfer is necessary to establish, exercise or defend legal claims

We may also transfer data for the purpose of our compelling legitimate interests, so long as those interests are not overridden by your interests, rights and freedoms. Specific conditions apply to such transfers and we will provide relevant information if and when we seek to transfer your personal data on this ground.

Further information

If you would like further information about data transferred outside the UK or EEA, please contact Data Privacy Manager (see ‘Contact details’ above).

Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data (the right of access)
Rectification	The right to require us to correct any mistakes in your personal data
To be forgotten	The right to require us to delete your personal data — in certain situations
Restriction of processing	The right to require us to restrict processing of your personal information—in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: —at any time to your personal data being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the [Guidance from the UK Information Commissioner’s Office \(ICO\) on individuals’ rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- email, call or write to our Data Privacy Manager —see above: ‘**Contact details**’; and
- let us have enough information to identify you



- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your data will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Unfortunately, no data transmission over the internet or any other network can be guaranteed as 100% secure. As a result, whilst we strive to protect your personal data, we cannot ensure and do not warrant the security of any information you transmit to us, and this information is transmitted at your own risk.

How to complain

We hope that our Data Privacy Manager can resolve any query or concern you may raise about our use of your data.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

Changes to this privacy notice

This privacy notice was published on 23/04/2021 and last updated on 23/04/2021.

We may change this privacy notice from time to time—when we do, we will inform you via our website.