

## Inclutech Privacy Policy

### 1 Keeping your data safe

- 1.1 We are committed to keeping your personal data safe and secure and handling it in accordance with our legal obligations. This Privacy Policy sets out in detail the purposes for which we process your personal data, who we share it with, what rights you have in relation to that data and everything else we think it's important for you to know.

### 2 Who's in control of my personal data?

- 2.1 The Inclutech website, platform and app are run by Inclutech Limited (**we, us, our**). We are the "controller" of the personal data that we collect and process for the purposes of providing Inclutech and for any other purposes set out in this Privacy Policy. This means that we are responsible for deciding how and why your data is used and for ensuring that your data is handled legally and safely.

### 3 What data do you collect and where from?

- 3.1 We collect the following personal data from you when you set up an account with the app (**Account Information**):
- 3.1.1 your full name;
  - 3.1.2 your email address; and
  - 3.1.3 a password.
- 3.2 If you sign up for our mailing list on our website, we will collect your name and email address.
- 3.3 We will collect personal data from you if you contact us by post, email, telephone or social media with comments, queries or complaints. This will include your name, contact details and any other personal data you provide to us in your correspondence.
- 3.4 We collect technical information about how you use Inclutech. This includes your IP addresses, device identifiers and information about how long you have stayed on certain pages or what pages you have clicked on. We use cookies to do this – please see our Cookies Policy for more information.

### 4 What do you use my personal data for?

- 4.1 We use your Account Information and your Profile Information to:
- 4.1.1 set up, manage and administer your account and your profile;
  - 4.1.2 log you into the platform and/or app;
  - 4.1.3 allow you to use all the features of the platform and/or app that are available to you;
  - 4.1.4 verify your identity and monitor account set-up;
  - 4.1.5 ensure that your account, your profile and your personal data are kept secure.
- 4.2 If you misuse our app in any way (for example by creating hoax or false information), we will monitor your usage of the app and we may be asked to pass on your details to the police and/or to investigate your app usage further. If we are satisfied that we are legally allowed to pass your details on we will do so.

- 4.3 We use your email address to contact you occasionally with service messages about Inclutech, for example to provide you with password reminders.
- 4.4 We use information you voluntarily provide to us when contacting us with queries, comments or complaints to enable us to respond to those queries, complaints or comments and to make sure that these are appropriately dealt with.
- 4.5 We use your personal data, including the technical data that we collect, to help us monitor, analyse and improve Inclutech to ensure that we are providing you with the best possible service.

**5 Marketing**

- 5.1 We will use your name and email address to send you marketing communications in the following circumstances:
  - 5.1.1 if you proactively sign up to our mailing list on our website; and/or
  - 5.1.2 if you provide your consent to receive marketing communications when you sign up for an account on our platform and/or app.
- 5.2 If you sign up to receive information about our own products and services, we will send you newsletters and product updates from time to time. We also sometimes use other personal data we hold about you to decide if particular marketing is relevant to you.
- 5.3 We never share your information with third parties for marketing purposes. However, we sometimes partner with other organisations to market their products and services on their behalf. If this is the case and you have signed up to receive this kind of marketing, we will use other information that we hold about you to make sure that the information we send you is relevant and useful to you.
- 5.4 You can opt out of marketing at any time by clicking "unsubscribe" in any marketing communications. Please note that unsubscribing from marketing of our own products and services will not unsubscribe you from marketing about third party products and services, and vice versa. If you want to unsubscribe from all marketing, you will need to opt out of both types of marketing.

**6 What happens if I don't provide my personal data?**

- 6.1 If you do not provide the personal data that we request, you will not be able to set up an account with us or use Inclutech.

**7 What is your legal basis for using my personal data?**

- 7.1 Data protection law says that we have to tell you the "legal basis" that we rely on to process your personal data for the purposes that we have notified to you. The "legal basis" is our lawful justification for processing your personal data. The table below tells you what that legal basis is in relation to each of the purposes set out above.
- 7.2 Where the table below state that we process personal data because it is in our "legitimate interests" to do so, you should note that you have a right to object to us processing your personal data for those purposes. However, this is a limited right and we will not need to comply with your request if we have compelling legitimate grounds to continue processing your personal data for those purposes. You should also be aware that if we stop processing your personal data for those purposes, you will not be able to use Inclutech for its intended purposes.

Purpose	Personal data used	Legal basis
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Running your account and allowing you to access and use Inlutech, including contacting you with service messages	Account Information and Profile Information	We process this personal data for this purpose on the basis that this information is necessary in order to perform our contract with you to provide your account and to allow you to use the Inlutech platform and/or app.
Marketing our own products and services	Name and email address	We process this personal data for this purpose on the basis that it is in our legitimate interests to do so. We have an interest in promoting our app and our business. You can opt out of receiving marketing at any time by clicking "unsubscribe" in any marketing communication.
Marketing products and services from other companies and deciding what products and services are relevant or interesting to you	Other personal data, such as age, gender and disability information	We process this personal data for this purpose on the basis that we have your consent to do so. Your consent is obtained when you sign up for marketing of third party products and services. You can withdraw your consent at any time by clicking "unsubscribe" in any marketing communication.
Contacting you in response to correspondence you send us	Name, email address, telephone number and any other personal data you voluntarily provide when you contact us	We process this personal data for this purpose on the basis that it is in our legitimate interests to do so. We have an interest in ensuring that correspondence, comments and queries are dealt with effectively and appropriately so that we can preserve our business reputation and continue to improve our business.
Improving our services	The technical information that we collect about your device and how you use the Website	We process this personal data for this purpose on the basis that this information is necessary for our legitimate interests. We have an interest in ensuring that we continue to improve our app and website and provide our users with the best and most effective service possible.

## 8 Who do you share my personal data with?

8.1 We need to share your personal data with some third parties in the following circumstances:

8.1.1 Some of our third party suppliers will be able to access your personal data when they perform services for us. The only third party suppliers we currently use who have access to your personal data are as follows:

(a) our website and app designer and developer; and

- (b) our hosting provider, AWS (which hosts your personal data for us on servers within the EU).

We have made sure that we have robust contracts in place with these suppliers requiring them to handle personal data safely and in accordance with all legal obligations.

- 8.2 We will also share your personal data with third parties in the following circumstances:
  - 8.2.1 where you have specifically consented to us sharing your data with a particular third party;
  - 8.2.2 where we are required or permitted to do so by law or to protect or enforce our rights or the rights of any third party; and
  - 8.2.3 if our business or any part of it is acquired by a third party, in which case we will need to share your personal data with that third party.
- 8.3 We do not transfer or store your personal data outside the UK and the European Economic Area (**EEA**). If we do transfer your data outside the EEA, we will inform you and we will ensure that equivalent protections to those in the UK are put in place to protect your personal data.

## **9 How long do you keep my personal data for?**

- 9.1 As set out above, we will keep your Account Information and your Profile Information for as long as your account remains open. You can close your account at any time by contacting us in accordance with the process set out in our Terms and Conditions. Once your account has been closed, we will erase your Account Information and Profile Information, unless we need to keep this data in order to respond to any complaints or claims that you make (in which case we will only keep the data for as long as we need to in order to fulfil those purposes).
- 9.2 We will retain operational data for 7 years from the date of receipt.
- 9.3 We will keep records of any correspondence that we have with you for 7 years from the date of the relevant correspondence.
- 9.4 If you have signed up to our mailing list, we will keep your name and email address until you unsubscribe. When you close your account, we will give you the option to unsubscribe from our mailing lists.

## **10 What rights do I have?**

- 10.1 You have a number of rights under data protection law. These rights and how you can exercise them are set out in this section. We will normally need to ask you for proof of your identity before we can respond to a request to exercise any of the rights in this section and we may need to ask you for more information, for example to help us to locate the personal data that your request relates to.
- 10.2 We will respond to any requests to exercise your rights as soon as we can and in any event within one month of receiving your request and any necessary proof of identity or further information. If your request is particularly difficult or complex, or if you have made a large volume of requests, we may take up to three months to respond. If this is the case we will let you know as soon as we can and explain why we need to take longer to respond.
- 10.3 If you want to exercise any of these rights, please email us at [mydata@inclutech.co](mailto:mydata@inclutech.co)
- 10.4 A right to access your information

- 10.4.1 You have a right to ask us to send you a copy of all the personal data that we hold about you (subject to some exceptions).
- 10.5 A right to an electronic copy of your information
  - 10.5.1 You can also ask us to send you the Account Information and Profile Information we hold about you in a common electronic format, or to ask us to transfer that data to a third party if you want us to and if it is technically feasible for us to do so.
- 10.6 A right to object to us processing your information
  - 10.6.1 You have a right to object to us processing any personal data that we process where we are relying on legitimate interests as the legal basis of our processing. If we have compelling legitimate grounds to carry on processing your personal data, we will be able to continue to do so.
- 10.7 A right to ask us not to market to you
  - 10.7.1 You can ask us not to send you direct marketing. You can do this by following the "unsubscribe" instructions in any marketing emails.
- 10.8 A right to have inaccurate data corrected
  - 10.8.1 You have a right to ask us to correct inaccurate data that we hold about you. If we are satisfied that the new data you have provided is accurate, we will correct your personal data as soon as possible.
  - 10.8.2 You can update your own Account Information and Profile Information at any time through your account settings. It is your responsibility to ensure that your personal data is accurate and up-to-date.
- 10.9 A right to have your data erased
  - 10.9.1 You have a right to ask us to delete your personal data in certain circumstances, for example if we have processed your data unlawfully or if we no longer need the data for the purposes set out in this Privacy Policy.
  - 10.9.2 We will delete the personal data associated with your account as set out under "How long do we keep your data for?" above. Remember that you can close your account at any time.
  - 10.9.3 You have a right to request the deletion of your account as set out under "How long do we keep your data for?".
- 10.10 A right to have processing of your data restricted
  - 10.10.1 You can ask us to restrict processing of your personal data in some circumstances, for example if you think the personal data is inaccurate and we need to verify its accuracy, or if we no longer need the data but you require us to keep it so that you can exercise your own legal rights.
  - 10.10.2 Restricting your personal data means that we only store your personal data and don't carry out any further processing on it unless you consent or we need to process the data to exercise a legal claim or to protect a third party or the public.
- 11 Do you use cookies?**
  - 11.1 Like most websites and apps, Inclutech uses cookies to improve performance. Please see our Cookies Policy for more information.

**12 How can I contact you?**

12.1 If you have any questions or concerns about this Privacy Policy and/or our processing of your personal data, you can contact us at [mydata@inclutech.co](mailto:mydata@inclutech.co)

**13 What if I have a complaint?**

13.1 You have a right to complain to the Information Commissioner's Officer (**ICO**), which regulates data protection compliance in the UK, if you are unhappy with how we have processed your personal data.

13.2 You can find out how to do this by visiting [www.ico.org.uk](http://www.ico.org.uk).

**14 What if this policy changes?**

14.1 We may make changes to this Privacy Policy from time to time. Any changes we make will be posted on this page. We may also notify you by email if significant changes are made.