

Privacy Policy

This privacy policy (“Privacy Policy”) sets out how Nesscomp Limited (“we”, “us”, “our”) uses and protects any information that the Customer or an Authorised User (“you”) give us when you use this website (“Site”) or the Solution or Services (“Services”).

We are committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this Site or the Services, then you can be assured that it will only be used in accordance with this Privacy Policy.

This privacy policy together with our Terms and Conditions and any other documents referred to therein, sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting this Site or using the Services, you are accepting and consenting to the practices described in this Privacy Policy.

For the purpose of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, (“GDPR”) or any subsequent amendment or replacement or supplementary legislation (together “Data Protection Law”), the data controller is Nesscomp Limited of Boundary House, Boston Road, London, W7 2QE, England and we confirm that we have a data protection officer (“DPO”) who can be contacted as set out at the end of this Privacy Policy.

Legal Basis for Processing

We collect and use the personal data described below in order to provide you with access to our website and services in a reliable and secure manner. We also collect and use personal data:

- For our legitimate business needs.
- To fulfil our contractual obligations to you.
- To comply with our legal obligations.

To the extent we process your personal data for any other purposes, we ask for your consent in advance or require that our partners obtain such consent.

Information we collect from you

We may collect and process the following information about you:

Information you give us. You may give us information about you by filling in forms on our Site or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our Site, apps, subscribe to or use our Services, subscribe to our newsletter, search for a product, place an order on our Site, participate in

discussion boards or other social media functions on our Site or within the Services, enter a competition, promotion or survey, and when you report a problem with our Site or Services.

The information you give us may include:

- Name and job title.
- Contact information including your email address, phone number.
- Demographic information such as postcode, your preferences and interests.
- Personal description and photograph.
- Other information relevant to customer surveys and/or offers.

Information we collect about you. With regard to each of your visits to our Site or Services we may automatically collect the following information:

- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.
- Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Site or Services (including date and time). products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- Information from other online accounts to which you have given us permission to collect data from within your settings or the privacy policies of these other online services. For example, this can be via social media or by choosing to send us your location data when accessing our Site or Services from your smartphone; or it can be from the integrations and connections that you choose to install when using the Site or Services.

Information we receive from other sources. We may receive information about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on this Site or within the Services.

We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

Cookies

We use cookies on our Site and in the Services to distinguish you from other users of our Site and Services. This helps us to provide you with a good experience when you browse our Site, use our Services and also allows us to improve the Site and Services.

What are cookies?

A cookie is a small file which asks permission to be placed on your computer’s hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or 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.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

We use persistent cookies and session cookies.

Persistent Cookies

A persistent cookie is stored on a user’s device in between browser sessions which allows the preferences or actions of a user across the Site (or in some cases across different websites) to be remembered. We use persistent cookies to save your login information for future logins to the Site or Services.

Session Cookies

A session cookie allows the Site or Services to link your actions during a browser session. We use session cookies to enable certain features of the Site or Services, to better understand how you interact with the Site or Services and to monitor aggregate usage by users and web traffic routing on the Site. Unlike persistent cookies, session cookies are deleted from your computer when you log off from the Site or Services and then close your browser.

Which cookies we use and why

The table below explains the cookies we use and why we use each of them.

Cookie	Type	Purpose
Google Analytics	Tracking cookies	These cookies are used to collect information about how visitors use our Site. We use the information to compile reports and to help us improve the Site. The cookies collect information in an anonymous form, including the number of visitors to the Site, where visitors have come to the Site from and the pages they visited. If you do not allow these cookies we will not be able to include your visit in our statistics. You can read the full Google Analytics privacy policy at: http://www.google.com/policies/privacy/ .
Anonymous Analytics	Analytics cookies.	We use analytics cookies to tell us whether you have visited the Site previously, and to gather statistics about visits to a page.
Registration	Signin cookies	When you sign in, we generate cookies that let us know whether you are signed in or not. Our servers use these cookies to work out which account you are signed in with.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer or to prompt you before accepting a cookie from the websites you visit. If you do not accept cookies, however, you may not be able to use the whole of the Site or all functionality of the Services.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org or www.allaboutcookies.org. To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

What we do with the information we gather?

We use information held about you in the following ways.

Information you give to us. We will use this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- To carry out our obligations arising from any contracts entered into between you and us.
- To provide you with the information, products and services that you request from us.
- To provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about.
- Internal record keeping.
- To improve our products and services.
- To provide you with information about new products, special offers or other information which we think you may find interesting using the email address which you have provided. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this by ticking the relevant box situated on the form on which we collect your data.
- To contact you for market research purposes. We may contact you by email, phone, fax or mail.
- To notify you about changes to the Site or Services.
- To ensure that content from our Site or Services is presented in the most effective manner for you and for your computer.

Information we collect about you. We will use this information:

- To administer our Site and Services and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- To inform you about scheduled Service and Site downtimes and new features.
- To improve our Site and Services to ensure that content is presented in the most effective manner for you and your computer.
- To allow you to participate in interactive features of our Services, when you choose to do so.
- As part of our efforts to keep our Site and Services safe and secure.

- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.
- To make suggestions and recommendations to you and other users of our Site and Services about our goods or services that may interest you or them.
- To customise the website according to your interests.

Information we receive from other sources. We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

- We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen.

Disclosure of your Information

Information we share with third parties. We may share your information with selected third parties including:

- Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.
- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you, such as Google, Zendesk, Facebook, Sage.
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 250 men aged over 25 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women living in London). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.
- Analytics and search engine providers that assist us in the improvement and optimisation of our Site or Services.
- Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

Information we disclose to third parties. We may disclose your personal data to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If we or a member of our group of companies or substantially all of their assets are acquired by a third party, in which case personal data held by them about their 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 and Conditions](#) and/or any other agreements; or to protect our rights, property, safety, our customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

WHERE WE STORE YOUR PERSONAL DATA

Our Services are global and your information (including personal data) may be stored and processed in any country where we have operations or where we engage service providers, and we may transfer your information to countries outside of your country of residence, which may have data protection rules that are different from those of your country of residence.

The personal data that we collect from you may therefore be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers or partners. Such staff or subcontractors may be engaged in, among other things, the fulfilment of your order, the processing of your payment details or the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing outside of the EEA.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy. In particular, this means that your personal data will only be transferred to a country that provides an adequate level of protection (for example, where the European Commission has determined that a country provides an adequate level of protection) or where the recipient is bound by standard contractual clauses according to conditions provided by the European Commission ("**EU Model Clauses**").

Our Site and Services are accessible via the internet and may potentially be accessed by anyone around the world. Other users may access the Site or Services from outside the EEA. This means that where you chose to post your data on our Site or in our Services, it could be accessed from anywhere around the world and therefore a transfer of your data outside of the EEA may be deemed to have occurred. You consent to such transfer of your data for and by way of this purpose.

PROTECTION OF INFORMATION

All information you provide to us is stored on our secure servers. Any credit card information or payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Site, you are responsible for keeping this password confidential. We ask you not to share any password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will endeavour to protect your personal data, we cannot guarantee the security of your data transmitted to our Site or Services. Any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

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.

Links to other websites

Our Site or Services may contain links to other websites of interest. However, once you have used these links to leave our Site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by our Privacy Policy. You should exercise caution and look at the privacy policy applicable to the website in question.

Your Rights

You have the right under Data Protection Law, free of charge, to request:

- Access to your personal data.
- Rectification or deletion of your personal data.
- A restriction on the processing of your personal data.
- Object to the processing of your personal data.
- A transfer of your personal data (data portability).

You can make a request in relation to any of the above rights by emailing us at the contact address given at the end of this Privacy Policy. We will respond to such queries within 30 days and deal with requests we receive from you, in accordance with the provisions of Data Protection Law.

Consent

You have the right to withdraw your consent to us processing your personal data, at any time, by contacting us as set out at the end of this Privacy Policy.

Where we process your personal data for marketing purposes, we will inform you and obtain your opt in consent (before collecting your personal data) if we intend to use your personal data for such purposes or if we intend to disclose your information to any third party for such purposes. If you change your mind about being contacted in the future, please opt out by clicking the “unsubscribe” link at the bottom of any email. Once you do this, you will no longer receive any marketing emails from us. We will continue to communicate with you regarding your service billing and support via email.

We send push notifications from time to time in order to update you about any service updates, events and promotions we may be running. If you no longer wish to receive these communications, please disable these in the settings on your device.

Data Retention

We retain personal data for as long as necessary for the relevant activity for which it was provided or collected. This will be for as long as we provide access to the Site or Services to you, your account with us remains open or any period set out in any relevant contract you have with us. However, we may keep some data after your account is closed or you cease using the Site or Services for the purposes set out below.

After you have closed your account or ceased using the Site we usually delete personal data, however we may retain personal data where reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, maintain security, prevent fraud and abuse, resolve disputes, enforce our Terms, Terms and Conditions, or fulfil your request to “unsubscribe” from further messages from us.

We will retain de-personalised information after your account has been closed.

Please note: After you have closed your account or deleted information from your account, any information you have shared with others will remain visible. We do not control data that other users may have copied from the Site. Your profile may continue to be displayed in the services of others (e.g. search engine results) until they refresh their cache.

Complaints

If you have any complaints about our use of your personal data please contact us as set out at the end of this Privacy Policy or contact our supervisory authority in the UK: The Information Commissioner’s Office at, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England (“ICO”).

Age of Users

This Site is not intended for and shall not be used by anyone under the age of 16.

Changes to our Privacy Policy

Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Privacy Policy. This Privacy Policy was last updated on the 12th of July 2018 and replaces any other Privacy Policy previously applicable from this date.

Contact

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to:

By post: DPO, Nesscomp Limited at 6 Maple Grove Business Centre, Lawrence Road, Middlesex TW4 6DR.

By email: dpo@nesscomp.com