

## 1. WHO WE ARE

Palea Systems Limited (referred to as "**Palea**", "**we**", "**us**" or "**our**" in this privacy policy) respects your privacy and is committed to protecting your personal data. This privacy policy aims to give you information on how we collect and process your personal data. This privacy policy also aims to inform you of your rights and how the law protects you in terms of your privacy. Please be aware that this website is not intended for children and we do not knowingly collect data relating to children. Palea is the Data Controller, meaning that we are responsible for your personal data that we process for the purposes set out in this privacy policy.

### Contact Details

If you have any questions about this privacy policy, please contact us in the following ways:

Email address: [info@paleasystems.com](mailto:info@paleasystems.com)

Postal address: Kinburn Castle, Doubledykes Road, St. Andrews, KY16 9DR

### Changes to the Privacy Policy

We keep our privacy policy under regular review and, if we make any changes, we will publish the changes on our website.

### Third-party links

This 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.

## 2. WHAT IS PERSONAL DATA?

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 (i.e. anonymised data).

### Personal data we may collect

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, last name, username or similar identifier, title.
- **Contact Data** includes email address and telephone numbers.
- **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.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **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 this website.
- **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.

We may collect **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data).

#### **Keeping your personal data up to date**

It is important that the personal data we hold about you is accurate and current. Therefore, please inform us if your personal data changes during your relationship with us so that we can ensure that this is updated.

#### **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.

### **3. 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 and Contact Data by filling in our enquiry form on our website or completing an order form. This includes personal data you provide when you:
  - apply for our products or services;
  - create an account with us;
  - subscribe to our service or publications;
  - request marketing to be sent to you; 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, server logs and other similar technologies.
- **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 analytics providers such as Google based outside the EU;
  - Identity and Contact Data from publicly available sources such as Companies House.

### **4. 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.

#### **Marketing and promotional offers from us**

We strive to provide you with choices regarding the way we process your data, particularly in relation to marketing and advertising. 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, purchased goods or services from us and you have not opted out of receiving that marketing, or where we contact you using your business contact details.

### **Opting Out**

You can ask us to stop sending you marketing messages at any time by contacting us at any time at [info@paleasystems.com](mailto:info@paleasystems.com). 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.

### **Cookies**

A cookie is a small file which is sent to and from the web pages that you access. Cookies can be used to identify your browsing activity and we may use cookies to understand how you use our website and to help us make your experience of our website better.

We may use programs such as Google Analytics to identify:

- the volume of people visiting our website;
- which pages are most popular;
- how long people spend on our website; and
- what type of information they're searching for.

These insights help us understand how we can improve your experience of using our website.

Google Analytics uses cookies to collect non-personally identifiable information like:

- browser types;
- operating systems;
- referring sites that sent you to us; and
- the dates and times of a visit.

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.

### **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.

## **5. DISCLOSURE OF PERSONAL DATA**

We may share your personal data with the parties set out below because the processing is necessary for our legitimate interests. Where our legal basis for processing your personal data is legitimate interest, we ensure that our legitimate interests are proportionate to and do not override your interests and fundamental data protection rights.

- External Third Parties including Thorntons Law LLP who provide us with legal advice and provide legal advice to users of Palea which will involve their processing of your personal data.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

## 6. **INTERNATIONAL TRANSFERS**

We do not transfer your personal data outside the European Economic Area (**EEA**).

## 7. **DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

## 8. **DATA RETENTION**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes. In some circumstances you can ask us to delete your data (please see your legal rights detailed below for further information). In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## 9. **YOUR RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- **Right to be informed** about the collection and use of their personal data.
- **Right to access** your personal data (commonly known as a "data subject access request"). This will enable you to receive a copy of your personal data we hold as well as other supplementary information. We will not provide you with information relating to other people.
- **Request a correction** of your personal data that we hold about you. This enables you to have any incomplete or inaccurate personal data we hold about you corrected. We may need to verify the accuracy of the new personal data provided by you.

- **Request erasure** of your personal data held by us. This allows you to request us to delete or remove personal data in certain circumstances.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

If you wish to exercise any of the rights set out above, please contact us at [info@paleasystems.com](mailto:info@paleasystems.com)

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **Information Commissioner's Office ("ICO")**

You have the right to make a complaint at any time to the ICO, the UK supervisory authority for data protection issues ([www.ico.org.uk](http://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.