

# Introduction

Hanlon Software Solutions Ltd respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

# Important Information & Who We Are

#### **Purpose**

This privacy policy aims to give you information on how Hanlon Software Solutions Ltd collects and processes your personal data through your use of this website, including any data you may provide through this website when you request a demo, brochure or phone call. This website is not intended for children and we do not knowingly collect data relating to children. 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

Hanlon Software Solutions Ltd is the controller and responsible for your personal data. 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 or our privacy practices, please contact our data privacy manager via: support@hanlons.co.uk

#### **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.

# 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, last name, or similar identifier.

- Contact Data includes email address and telephone numbers.
- Technical Data includes internet protocol (IP) address, 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.
- Marketing and Communications Data includes our preferences in receiving marketing from us.

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. We do not collect any 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). Nor do we collect any information about criminal convictions and offences.

## 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 Contact Data by filling in forms or by corresponding with us by email. This includes personal data you provide when you:
  - subscribe to our service.
  - request marketing to be sent to you.
  - 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.
- Third parties or publicly available sources. We will receive personal data about you from the following parties analytics and search information providers.

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 it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

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.

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(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><li>(a) Identity</li><li>(b) Contact</li><li>(c) Technical</li><li>(d) Usage</li><li>(e) Profile</li><li>(f) Marketing &amp; Communications</li></ul>	Necessary for our legitimate interests (to develop our products/services and grow our business)

#### Marketing

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

#### **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 to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you.

#### Cookies

See our Cookies 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 may share your personal data to 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.

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.

# International Transfers

We do not transfer your personal data outside the UK.

# **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 any applicable regulator of a breach where we are legally required to do so.

## **Data Retention**

### How Long Will You Use My Personal Data For?

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.

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