

General Privacy Notice

We are Susterra Ltd. We're a company registered in England and Wales with company number, whose registered address is at Finsbury Pavement, London ECA RS. In this privacy notice, we will refer to ourselves as 'we', 'us' or 'our'.

You can get hold of us in any of the following ways:

- by emailing us at info@susterra.co.uk;
- or by writing to us at Susterra Ltd, Finsbury Pavement, London, ECA 1RS.

We take the privacy, including the security of, personal information we hold about you seriously. This privacy notice is designed to inform you about how we collect information about you and how we use that personal information. You should read this privacy notice carefully so that you know and can understand why and how we use the personal information we collect and hold about you.

We have issue you with privacy notices from time to time, including when we collect personal information from you. This privacy notice is intended to supplement these and does not override them.

We may update this privacy notice from time to time. This version was last updated on May 24th, 2018.

1. Key Definitions

- 1.1 The key terms that we use throughout this privacy notice are defined below, for ease:
- 1.2 **Data Controller:** under UK data protection law, this is the organisation or person responsible for deciding how personal information is collected and stored and how it is used.
- 1.3 **Data Processor:** a Data Controller may appoint another organisation or person to carry out certain tasks in relation to the personal information on behalf of, and on the written instructions of, the Data Controller. (This might be the hosting of a site containing personal data, for example, or providing an email-marketing service that facilitates mass distribution of marketing material to a Data Controller's customer base.)
- 1.4 **Personal Information:** in this privacy notice, we refer to your personal data as 'personal information'. 'Personal information' means any information from which a living individual can be identified. It does not apply to information that has been anonymised.
- 1.5 **Special Information** - certain very sensitive personal information requires extra protection under data protection law. Sensitive data includes information relating to health, racial and ethnic origin, political opinions, religious and similar beliefs, trade union membership, sex life and sexual orientation and also includes genetic information and biometric information.

2. Details of personal information we collect and hold about you

- 2.1 Set out below are the general categories and details of retention periods in relation to those categories (see Section 8 below for more details about retention) and in each case the types of personal information that we collect, use and hold about you:

General Category	Types of Personal Data in category	Retention Periods
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Identity Information	This is information relating to your identity such as your name (including any previous names and any titles that you use), gender, marital status and date of birth	12 months
Contact Information	This is information relating to your contact details such as email address, address, telephone numbers	12 months
Marketing Information	This is information relating to your marketing and communications preferences	12 months

3. Details of special information we collect and hold about you

- 3.1. Special information is explained in Section 1 above. We do not collect or hold any special information about you.
- 3.2. We do not collect information from you relating to criminal convictions or offences.

4. Details of how and why we use personal information

- 4.1. We are only able to use your personal information for certain legal reasons set out in data protection law. There are legal reasons under data protection law other than those listed below; but, in most cases, we will use your personal information for the following reasons:
 - a. **Contract Reason:** this is in order to perform our obligations to you under a contract we have entered into with you;
 - b. **Legitimate Interests Reason:** this is where the use of your personal information is necessary for you (or a third party's) legitimate interests, so long as that legitimate interest does not override your fundamental rights, freedoms or interests;
 - c. **Legal Obligation Reason:** this is where we have to use your personal information in order to perform a legal obligation by which we are bound; and
 - d. **Consent Reason:** this is where you have given us your consent to use your personal information for a specific reason or specific reasons.
- 4.2. As explained in Section 3 above, there are more sensitive types of personal data, which require higher levels of protection. Where we process such sensitive types of personal data, we will usually do this in the following circumstances:
 - a. We have your explicit consent;

b. Where you have made the personal data public.

- 4.3. So that we are able to provide you with services, we will your personal information. If you do not provide us with the required personal information, we may be prevented from supplying the services to you.
- 4.4. It is important you keep your personal information up to date. If any of your personal information changes, please contact us as soon as possible to let us know. If you do not do this, then we may be prevented from supplying the services to you.
- 4.5. Where we rely on consent for a specific purpose as the legal reason for processing your personal information, you have the right under data protection law to withdraw your consent at any time. If you do not wish to withdraw your consent, please contact us using the details set out at the beginning of this notice. If we receive a request from your withdrawing your consent to a specific purpose, we will stop processing your personal information for that purpose, unless we have another legal or legitimate reason for processing your personal information - in which case, we will confirm that reason to you.
- 4.6. We have explained below the different purposes for which we use your personal information and, in each case, the legal reason(s) allowing us to use your personal information. Please also note the following:
- a. If we use the Legitimate Interests Reason as the legal reason for which we can use your personal information, we have also explained what that legitimate interest is; and
 - b. for some of the purposes, we may have listed more than one legal reason on which we can use your personal information, because the legal reason may be different in different circumstances. If you need confirmation of the specific legal reason we are relating on to use your personal data for that purpose, please contact us using the contact details set out at the start of this privacy notice.

Purpose	Legal Reason(s) for using the personal information
To enrol you are a customer	Contract Reason
To manage our contract with you and to notify you of any changes	Contract Reason
To comply with audit and accounting matters	Legal Obligation Reason
To understand how customers and visitors use the website and interact with it via data analysis	Legitimate Interests Reason (to improve and grow our business, including our website, and to understand our customer's needs, desires and requirements)

- 4.7. Sometimes we may anonymise personal information so that you can no longer be identified from it and use this for our own purposes. In addition, sometimes we may use some of your personal information together with other people's personal information to give us statistical information for our own purposes. Because this is

grouped together with other personal information and you are not identifiable from that combined data we are able to use this.

- 4.8. Under data protection laws, we can only use your personal information for the purposes we have told you about, unless we consider that the new purpose is compatible with the purpose(s) we told you about. If we want to use your personal information for a different purpose that we do not think is compatible with the purpose(s) we told you about, then we will contact you to explain this and what legal reason is in place to allow us to do this.

5. Details of how we collect personal information and special information

- 5.1. We usually collect Identity Information, Contact Information, directly from you when you purchase goods, services and/or digital content from us, contact us by email, telephone, in writing or otherwise.

6. Details about who personal information may be shared with

- 6.1. We may need to share your personal information with other organisations or people. These organisations include:

- a. Third parties who may include:

- i. Suppliers: such as IT support services, payment providers, administration providers, marketing agencies;
- ii. Our advisers: such as lawyers accountants, auditors, insurance companies;
- iii. Email platforms;

- b. Any organisations that propose to purchase our business and assets, in which case we may disclose your personal information to the potential purchaser.

- 6.2. Depending on the circumstances, the organisations or people who we share your personal information with will be acting as either Data Processors or Data Controllers. Where we share your personal information with a Data Processor, we will ensure that we have in place contracts that set out the responsibilities and obligations of us and them, including in respect of security of personal information.
- 6.3. We do not sell or trade any of the personal information you have provided to us.

7. Details about transfers to countries outside of the EEA

- 7.1. We do not transfer your personal information outside the EEA.

8. Details about how we hold your personal information

- 8.1. We will only hold your personal data for as long as is necessary. How long is necessary will depend upon the purposes for which we collected the personal information (see Section 4 above) and whether we are under any legal obligation to keep the personal information (such as in relation to accounting or auditing records or for tax reasons). We may also need to keep personal information in case of any legal claims.

- 8.2. You can contact us (using the details at the beginning of this notice) to request a copy of our retention policy, which sets out how long different types of personal data will be kept for.

9. Your rights under data protection law

- 9.1. Under data protection laws, you have certain rights in relation to your personal information, as follows:
- a. **Right to request access:** (This is often called ‘subject access’). This is the right to obtain from us a copy of the personal information that we hold about you. We must also provide you with certain other information in response to these requests to help you understand how your personal information is being used.
 - b. **Right to correction:** This is the right to request that any incorrect data is corrected and that any incomplete personal data is completed.
 - c. **Right to erasure:** (This is often called the ‘right to be forgotten’). This right only applies in certain circumstances. Where it does apply, you have the right to request us to erase all of your personal information.
 - d. **Right to restrict processing:** This right only applies in certain circumstances. Where it does apply, you have the right to request us to restrict the processing of your personal information.
 - e. **Right to data portability:** This right allows you to request us to transfer your personal information to someone else.
 - f. **Right to object:** You have the right to object to us processing your personal information for direct marketing purposes. You also have the right to object to us processing personal information where our legal reason for doing so is the Legitimate Interests Reason (see Section 4 above) and there is something about your particular situation that means that you want to object to us processing your personal information. In certain circumstances, you have the right to object to processing where such processing consists of profiling (including profiling for direct marketing).
- 9.2. In addition to the rights set out in Section 10.1., where we rely on consent as the legal reason for using your personal information, you have the right to withdraw your consent. Further details about this are set out in Section 4.5.
- 9.3. If you want to exercise any of the above rights in relation to your personal information, please contact us using the details set out at the beginning of this notice. If you do make a request, then please note:
- a. we may need certain information from you so that we can verify your identity;
 - b. we do not charge a fee for exercising your rights unless your request is unfounded or excessive; and
 - c. if your request is unfounded or excessive, then we may refuse to deal with your request.

10. Marketing

- 10.1. You may receive marketing from us about similar goods and services, where either you have consented to this, or we have another legal reason by which we can contact you for marketing purposes.
- 10.2. However, we will give you the opportunity to manage how or if we market to you. In any email that we send to you, we provide a link to either unsubscribe or opt out, or to change your marketing preferences. If you have an account with us, you can login to your account and manage your preferences there too. To change your marketing preferences, and/or to request that we stop processing your personal

information for marketing purposes, you can always contact us on the details set out at the beginning of this notice.

10.3. If you do request that we stop marketing to you, this will not prevent us from sending communications to you that are not to do with marketing (for example in relation to services that you have purchased from us).

10.4. We do not pass your personal information on to any third parties for marketing purposes.

11. Complaints

11.1. If you are unhappy about the way that we have handled or used your personal information, you have the right to complain to the UK supervisory authority for data protection, which is the Information Commissioner's Office (**ICO**). Please do contact us in the first instance if you wish to raise any queries or make a complaint in respect of our handling or use of your personal information, so that we have the opportunity to discuss this with you and to take steps to resolve the position. You can contact us using the details set out at the beginning of this privacy notice.

12. Third-party websites

12.1. Our website may contain links to third-party websites. If you click and follow those links, then these will take you to the third-party website. Those third-party websites may collect personal information from you and you will need to check their privacy notices to understand how your personal information is collected and used by them.