

Customer Data Protection Policy

If you would like this Policy in another format (for example: audio, large print) please contact us by sending an email to dc@seeio.co.uk or by calling us on 0203 855 5776. If you have any questions about the Site or this Policy, please contact us.

Board Originator Ltd. (**us / the Company**) respects your privacy and is committed to protecting your Personal Data when you use our website seeio.co.uk (**our website**).

PURPOSE OF THIS POLICY

This Policy sets out how we look after your Personal Data and privacy rights when you visit our website. From time to time, we may notify you in other ways about the processing of your Personal Data and/or send you an additional notice to cover specific processing.

It is important that you read this policy together with any other privacy, data protection, or fair processing policy or Terms we may provide on specific occasions when we are collecting or processing Personal Data about you, so that you are aware how and why we use your data. We keep this policy under regular review.

Our website is not intended for children and we do not knowingly collect data relating to children.

Controller

Has the meaning given to that term in Data Protection Laws of the United Kingdom.

Data Protection Law means the GDPR; the Data Protection Act 2018 (UK); and any laws which implement, supplement, replace, extend, re-enact, consolidate or amend any of the foregoing.

GDPR means the General Data Protection Regulation, Regulation (EU) 2016/679, to the extent it forms part of domestic law in the United Kingdom by virtue of section 3 of the European Union (Withdrawal) Act 2018 (including as further amended or modified by the laws of the United Kingdom or of a part of the United Kingdom from time to time).

Personal Data is as defined in Data Protection Laws and means any information about an individual from which that person can be identified. It does not include data where identity has been removed or redacted.

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 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:

1. **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender and professional history.
2. **Contact Data** includes billing address, delivery address, email address, and telephone numbers.
3. **Financial Data** includes bank account and payment card details.
4. **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
5. **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 our website.

6. **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
7. **Usage Data** includes information about how you use our website, products and services.
8. **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

Special Categories of Personal Data

We do not collect special categories of data about you (e.g. your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, genetic or biometric, criminal convictions or offences information).

Aggregated Data

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 collect, use and share aggregated data such as statistical or demographic data for any purpose, including to answer government surveys.

If we combine or connect Aggregated Data with your Personal Data such that it can directly or indirectly identify you, we treat the combined data as Personal Data.

Anonymised Personal Data (that can no longer be associated with you), for research or statistics, we may keep indefinitely without further notice to you.

HOW DO WE COLLECT YOUR DATA

We use different methods to collect data from and about you including through:

Direct interactions

You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes Personal Data you provide when you:

- Subscribe to use our products or services whether by free trial, evaluation or paid-for subscription
- create an account on our website
- subscribe to our service
- request marketing be sent to you
- consent to receive our news, marketing or publications;
- enter a competition, promotion or survey, or
- give us feedback, complain or praise
- 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. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.

Third parties or publicly available sources

We may receive Personal Data about you from various third parties and public sources as set out below:

Technical Data from the following parties:

- analytics providers;
- advertising networks; and

- search information providers.

Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside the UK.

Identity and Contact Data from data brokers or aggregators based inside the UK

Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the UK.

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.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below a description of the ways we plan to use your Personal Data, and which legal bases we rely on to do so. We may process your Personal Data for more than one lawful reason.

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (c) and to comply with legal obligations (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support,	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business

reporting and hosting of data)		reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
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	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

Legitimate interest

We may send promotions, suggestions or recommendations to existing customers based on us having a legitimate interest to do so.

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best experience.

We make sure we consider and balance any potential impact on your rights (both positive and negative) before we process your Personal Data for our legitimate interests.

We do not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are required or permitted to by law).

Marketing

We may use your Personal Data i.e. 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 strive to provide you with choices regarding certain Personal Data uses, particularly around marketing and advertising.

You will receive marketing communications from us if you consent. Our website asks anybody Contacting Us through the website, if they would like to opt-in to occasional marketing and news from us, which we send electronically.

Opting out

You can ask us (or third parties) to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time. 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, warranty registration, product/service experience or other transactions.

Required or permitted by law

Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where required or permitted by law.

CHANGE OF PURPOSE

We will only use your Personal Data for the purposes we collected it, unless we reasonably consider that we need to use it for another reason compatible with the original purpose. If we need to use your Personal Data for an unrelated purpose, we will notify you and explain the basis which allows us to.

THIRD PARTIES

We may share relevant parts of your Personal for the purposes below.

Where we have retained external third-party service providers, they may only process your Personal Data for specified purposes in accordance with our instructions. We require all third parties to respect the security of your Personal Data and that they treat it in accordance with the law.

1. To internal parties running the administration and communications of our business,
2. To external third parties for specified purposes in accordance with our instructions. We expect and require all third parties to respect the security of your Personal Data and to treat it in accordance with the law. These may include:
 - Any organisation appointed by us, or our agent, to trace you,
 - Payment providers assisting in the administration of relevant payments to and from you,
 - As necessary to administer our business with regulators, which include HM Revenue and Customs and the Information Commissioner's Office, fraud prevention agencies, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities,
 - Service provider processors based in the UK who provide IT and system administration services,
 - Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services,
 - other third parties, for example, credit referencing agencies, market researchers and fraud prevention agencies.
 - Where we are required or permitted to do so by law or regulatory authority,
 - Third parties to whom we may choose to sell, transfer or merge our business.

Any Users (Authorised Users or otherwise) that You authorise to view your company details within your Subscription with our Software you authorise to view and access all of your data including Personal Data in your Subscription. You will need to satisfy yourself that those Specific Third Parties will ensure the confidential treatment of your data including Personal Data.

INTERNATIONAL TRANSFERS

We do not transfer your Personal Data outside the UK.

External third parties may be based outside the UK so their processing of your Personal Data may involve a transfer of data outside the UK. If your Personal Data is transferred out of the UK, we require, and expect any of our third parties to require, a similar degree of protection as in the UK by

the following means:

- transfer to countries deemed to provide an adequate level of data protection,
- specific contracts which give Personal Data the same protection as in 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:

- We limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need to know.
- Our employees are subject to a duty of confidentiality and are expected to act in accordance with our instructions.
- We have procedures to deal with suspected Personal Data breach and will notify you and any applicable regulator of a suspected breach where legally required.

DATA RETENTION

We will retain your Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for, including satisfying legal, regulatory, tax, accounting or reporting requirements.

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

Example criteria:

- Kept as long as it is required to fulfil our obligations to you as a customer,
- for at least six years after you cease being a customer,
- as long as required by statutory authorities to meet our obligations for accounting, legal, tax, and regulatory purposes,
- For as long as your information is required to allow us to conduct fraud and/or criminal checks and investigations,
- kept in the reasonable expectation of litigation.

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.

YOUR RIGHTS

To exercise any of your legal rights, please contact us. We may need to request specific Personal Data from you to help us confirm your identity, to ensure your right to access your Personal Data (or exercise your rights) and to speed up our response. This is to ensure that your Personal Data is not disclosed to a person with no right to receive it.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer if your request is complex or you made a number of requests. If applicable, we will make you aware of this and keep you updated.

Your rights are:

Request correction of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected. We may need to verify the accuracy of the new data you provide to us.

Request erasure of your Personal Data to delete or remove Personal Data where there is no

good reason for us continuing to process it, or where you have successfully exercised your right to object to processing, where we may have processed your Personal Data unlawfully, or where we are required to erase to comply with local law. We may not always be able to comply with your request for specific legal reasons which will be notified to you.

Object to processing of your Personal Data where we are relying on a legitimate interest (or those of a third party) and you want to object due to impact on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for marketing purposes. In some cases, we may demonstrate that we have legitimate grounds which override your rights and freedoms.

Request restriction of processing enables you to ask us to suspend the processing of your Personal Data in the following scenarios:

1. To establish the data's accuracy,
2. Where our use is unlawful but you do not want us to erase,
3. 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,
4. If you objected to our use 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. This only applies to automated Personal Data that you initially consented we use or where we used the Personal Data to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your Personal Data. This will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw consent, we may not be able to provide certain products or services to you.

Request access to your Personal Data ("data subject access request"). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.

Fees

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). We may charge a reasonable fee if your request is unfounded, repetitive or excessive, or refuse to perform your request.

YOUR DUTIES

Keep us informed if your Personal Data changes during your relationship with us. It is important that the Personal Data we hold about you is accurate and current.

We may need to request specific Personal Data from you to help us confirm your identity and ensure you are entitled to exercise a right. This is an appropriate security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it.

Where we need to collect Personal Data from you 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 the contract we have with you and the service we provide you.

THIRD-PARTY LINKS

Our 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, please read the privacy policy in every other website you visit.

DATA PRINCIPLES

We will comply with UK data protection laws ensuring the Personal Data we hold about you is:

- 1) Used lawfully, fairly and in a transparent way.
- 2) Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- 3) Relevant to the purposes we have told you about and limited only to those purposes.
- 4) Accurate and kept up to date.
- 5) Kept only as long as necessary for the purposes we have told you about.
- 6) Kept securely.

QUESTIONS AND OVERSIGHT

You have the right to make a complaint about your data held with us at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would appreciate the chance to deal with your concerns in the first instance. We have a data privacy manager responsible for overseeing questions in relation to this privacy policy. If you have any questions about this policy, please contact the data privacy manager using the details set out below.

Board Originator Ltd.

dc@seeio.co.uk

Basement 40 Bramham Gardens London SW5 0HG

0203 855 5776

Last updated:
14 November 2023
19 Sep 2023
01 May 2022
10 December 2021

© copyright Board Originator Ltd. 2021