

## **PRIVACY POLICY**

How we protect your data and respect your privacy

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# Our role in your privacy

If you are an DE Data customer or subscriber, or just visiting our website, this policy applies to you.

## Our responsibilities

If you are a registered DE Data customer or a visitor to our website we act based on GDPR principles and security with all personal data. This means we determine how and why your data are processed.

## Your responsibilities

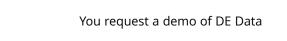
- Read this Privacy Policy
- If you are our customer, please also check the contracts between us: they may contain further details on how we collect and process your data.
- If you provide us with personal information about other people, or if others give us your information, we will only use that information for the specific reason for which it was provided to us. By submitting the information, you confirm that you have the right to authorise us to process it on your behalf in accordance with this Privacy Policy.

## When and how we collect data

From the first moment you interact with DE Data, we are collecting data. Sometimes you provide us with data, sometimes data about you is collected automatically.

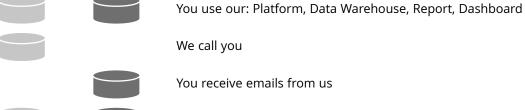
Here's when and how we do this:

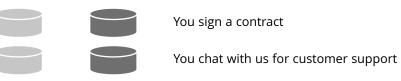




You opt in to marketing messages

You browse our website







# Types of data we collect

## **CONTACT DETAILS - PERSONALLY IDENTIFIABLE INFORMATION (PII)**

Your name, address, phone number, email address.

### **PAYMENT INFORMATION**

SWIFT code, credit/debit card details.

## DATA FROM YOUR DATABASE, CLOUD, CRM, ERP, SAP

Your data integrated into the platform, datamart, reports, dashboards.

#### **DATA THAT IDENTIFIES YOU**

Your IP address, login information, browser type and version, time zone setting, browser plug-in types, geolocation information about where you might be, operating system and version.

## DATA ON HOW YOU USE DE DATA

Your URL clickstreams (the path you take through our site), platform/services viewed, page response times, download errors, how long you stay on our pages, what you do on those pages, how often, and other actions.

## WHAT ABOUT REALLY SENSITIVE DATA?

We don't collect any "sensitive data" about you (like racial or ethnic origin, political opinions, religious/philosophical beliefs, trade union membership, genetic data, biometric data, health data, data about your sexual life or orientation, and offences or alleged offences) except when we have your specific consent, or when we have to comply with the law.

## WHAT ABOUT CHILDREN'S DATA?

DE Data is a business-to-business service directed to and intended for use only by those who are 18 years of age or over. We do not target DE Data at children, and we do not knowingly collect any personal data from any person under 16 years of age.

# How and why we use your data

Data protection law means that we can only use your data for certain reasons and where we have a legal basis to do so. Here are the reasons for which we process your data:

## **KEEPING DE DATA RUNNING**

Managing your requests (like inviting users, providing reporting & insights, connecting your DE Data account to other services), login and authentication, remembering your settings, processing payments, hosting and back-end infrastructure.

## **IMPROVING DE DATA**

Testing features, interacting with feedback platforms and questionnaires, managing landing pages, traffic optimization and data analysis and research, including profiling and the use of machine learning and other techniques over your data and in some cases using third parties to do this.

## **CUSTOMER SUPPORT**

Notifying you of any changes to our service, solving issues via phone or email including any bug fixing.

## **MARKETING PURPOSES (WITH YOUR CONSENT)**

Sending you emails and messages about new features, products and services, and content.



### THESE "LEGAL BASES" MEAN

#### Consent

You have given clear consent for you to process your personal data for a specific purpose.

## You can change your mind!

If you have previously given consent to our processing your data you can freely withdraw such consent at any time. You can do this by emailing us at info@de-data.co.uk.

If you do withdraw your consent, and if we do not have another legal basis for processing your information, then we will stop processing your personal data. If we do have another legal basis for processing your information, then we may continue to do so subject to your legal rights.

## **Legitimate interests**

Processing your data is necessary for our legitimate interests or the legitimate interests of a third party, provided those interests are not outweighed by your rights and interests. These legitimate interests are:

- gaining insights from your behaviour on our website or in our app
- delivering, developing and improving the DE Data service
- enabling us to enhance, customise or modify our services and communications
- enhancing data security

In each case, these legitimate interests are only valid if they are not outweighed by your rights and interests.

## Your privacy choices and rights

## Your choices

### YOU CAN CHOOSE NOT TO PROVIDE US WITH PERSONAL DATA

If you choose to do this, you can continue to use the website and browse its pages, but we will not be able to process operations & services without personal data.

## YOU CAN TURN OFF COOKIES IN YOUR BROWSER BY CHANGING ITS SETTINGS

You can block cookies by activating a setting on your browser allowing you to refuse cookies. You can also delete cookies through your browser settings. If you turn off cookies, you can continue to use the website and browse its pages.

### YOU CAN ASK US NOT TO USE YOUR DATA FOR MARKETING

We will inform you (before collecting your data) if we intend to use your data for marketing and if third parties are involved. You can opt out from marketing by emailing us at info@de-data.co.uk.

## Your rights

You can exercise your rights by sending us an email at info@de-data.co.uk.

### YOU HAVE THE RIGHT TO ACCESS INFORMATION WE HOLD ABOUT YOU

This includes the right to ask us supplementary information about:

- the categories of data we're processing
- the purposes of data processing
- the categories of third parties to whom the data may be disclosed
- how long the data will be stored (or the criteria used to determine that period)
- your other rights regarding our use of your data

We will provide you with the information within one month of your request, unless doing so would adversely affect the rights and freedoms of other (e.g. another person's confidentiality or intellectual property rights). We'll tell you if we can't meet your request for that reason.



# YOU HAVE THE RIGHT TO MAKE US CORRECT ANY INACCURATE PERSONAL DATA ABOUT YOU

# YOU CAN OBJECT TO US USING YOUR DATA FOR PROFILING YOU OR MAKING AUTOMATED DECISIONS ABOUT YOU

We may use your data to determine whether we should let you know information that might be relevant to you. Otherwise, the only circumstances in which we will do this is to provide the DE Data service to you.

### YOU HAVE THE RIGHT TO PORT YOUR DATA TO ANOTHER SERVICE

We will give you a copy of your data in CSV or TXT so that you can provide it to another service. If you ask us and it is technically possible, we will directly transfer the data to the other service for you. We will not do so to the extent that this involves disclosing data about any other individual.

## YOU HAVE THE RIGHT TO BE 'FORGOTTEN' BY US

You can do this by asking us to erase any personal data we hold about you, if it is no longer necessary for us to hold the data for purposes of your use of DE Data.

## How secure is the data we collect?

We have physical, electronic, and managerial procedures to safeguard and secure the information we collect.

### And please remember:

- You provide personal data at your own risk: unfortunately, no data transmission is guaranteed to be 100% secure
- You are responsible for your username and password: keep them secret and safe!
- If you believe your privacy has been breached, please contact us immediately on info@de-data.co.uk.

#### WHERE DO WE STORE THE DATA?

The personal data we collect is processed at our office in Prague and in any data processing facilities operated by the third parties identified below.

By submitting your personal data, you agree to this transfer, storing or processing by us. If we transfer or store your information outside the EEA in this way, we will take steps to ensure that your privacy rights continue to be protected as outlined in this Privacy Policy.

### **HOW LONG DO WE STORE YOUR DATA?**

We will archive and stop actively using any personal identifiable information about you within 6 months from the last time you used DE Data. We will delete your personal data from our archives no later than 6 years from the last time you used DE Data or as agreed with you in a separate contract.

### **COOKIES**

We use cookies. Unless you adjust your browser settings to refuse cookies, we (and these third parties) will issue cookies when you interact with DE Data. These may be 'session' cookies, meaning they delete themselves when you leave DE Data, or 'persistent' cookies which do not delete themselves and help us recognise you when you return so we can provide a tailored service.



### THIRD PARTIES WHO PROCESS YOUR DATA

Tech businesses often use third parties to help them host their application, communicate with customers, power their emails etc. We partner with third parties who we believe are the best in their field at what they do.

When we do this, sometimes it is necessary for us to share your data with them in order to get these services to work well. Your data is shared only when strictly necessary and according to the safeguards and good practices detailed in this Privacy Policy. Where personal data is transferred to a third party in the United States we take steps to ensure that the organisation in question has a current certification with the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks administered by the U.S. Department of Commerce's International Trade Administration (ITA).

Here are the details of our main third-party service providers, and what data they collect or we share with them, where they store the data and why they need it:

Service Provider	Data Collected or Shared	Purpose	Place of Processing	Privacy Policy
Vultr	<ul> <li>Personally Identifiable Information (PII)</li> <li>Data from your Database, SAP, CRM, ERP</li> </ul>	This is a hosted database provider - The Infrastructure Cloud	EU	https://www. vultr.com/legal/ privacy/
Microsoft	<ul> <li>Personally Identifiable Information (PII)</li> <li>Data from your Database, SAP, CRM, ERP</li> </ul>	Analytics platform Database Engine Online Storage	EU	https://privacy. microsoft. com/en-gb/ privacystatement
Google	<ul> <li>Personally Identifiable Information (PII)</li> <li>Data from your Database, SAP, CRM, ERP</li> </ul>	Online storage	EU	https://policies. google.com/ privacy
Tableau	<ul> <li>Personally Identifiable Information (PII)</li> <li>Data from your Database, SAP, CRM, ERP</li> </ul>	Analytics platform	EU	https://www. tableau.com/en- gb/privacy
MailChimp	Personally Identifiable     Information (PII)     Cookies	Marketing Platform	EU	https:// mailchimp.com/ legal/privacy/



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