



Surecode Software (our website) is provided by Surecode Limited, ('we', 'our' or 'us'). We are the controller of personal data obtained via our website, meaning we are the organisation legally responsible for deciding how and for what purposes it is used.

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share any information relating to you (your personal data) in connection with your use of our website. It also explains your rights in relation to your personal data and how to contact us or a relevant regulator in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the IOM General Data Protection Regulation (IOM GDPR).

Given the nature of our website, we do not expect to collect the personal data of anyone under 10 years old. If you are aware that any personal data of anyone under 10 years old has been shared with our website, please let us know so that we can delete that data.

This privacy policy is divided into the following sections:

- What this policy applies to.
- Personal data we collect about you.
- How your personal data is collected.
- How and why we use your personal data.
- Marketing.
- Who we share your personal data with.
- How long your personal data will be kept.
- Transferring your personal data out of the Isle of Man.

- Cookies and other tracking technologies.
- Your rights
- Keeping your personal data secure
- How to complain
- Changes to this privacy policy
- How to contact us

What this policy applies to

This privacy policy relates to your use of our website and software services.

Throughout our website we may link to other websites owned and operated by certain trusted third parties. Those third-party websites may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to those third party websites, please consult their privacy policies as appropriate.

Personal data we collect about you

The personal data we collect about you depends on the particular activities carried out through our website. We will collect and use the following personal data about you:

- your name, address and contact information, including email address, telephone number and company details.
- information to check and verify your identity, e.g. date of birth.
- your gender, if you choose to give this to us.
- location data, if you choose to give this to us.
- your billing information, transaction and payment card or other payment method information.
- details of any information, feedback, or other matters you give us by phone, email, post or via social media.
- your account details, such as username and login details.
- your activities on, and use of, our website.
- your contact history, purchase history and saved items.
- information about how you use our website and technology systems.

- your responses to surveys, competitions, and promotions

If you do not provide personal data we ask for where required it may prevent us from providing products and services to you.

We collect and use this personal data for the purposes described in the section 'How and why we use your personal data' below.

How your personal data is collected

We collect personal data from you:

- directly, when you enter or send us information, such as when you register with us, contact us (including via email), send us feedback, purchase products or services via our website, post material to our website and complete customer surveys or participate in competitions via our website, and
- indirectly, such as your browsing activity while on our website; we will usually collect information indirectly using the technologies explain in the section on 'Cookies and other tracking technologies' below.

We also collect personal data about you from other sources as follows:

- Stripe
- Paypal

How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason, for example:

- where you have given consent.
- to comply with our legal and regulatory obligations.
- for the performance of a contract with you or to take steps at your request before entering into a contract, or
- for our legitimate interests or those of a third party.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own. You can obtain details of this assessment by contacting us (see 'How to contact us' below).

The table below explains what we use your personal data for and why.

What we use your personal data for	Our reasons
Providing products AND/OR services to you	To perform our contract with you or to take steps at your request before entering into a contract
To enforce legal rights or defend or undertake legal proceedings	Depending on the circumstances: —to comply with our legal and regulatory obligations —in other cases, for our legitimate interests or those of a third party, i.e. to protect our business interests and rights, or those of others
Customise our website and its content to your particular preferences based on a record of your selected preferences or on your use of our website	Depending on the circumstances: —your consent as gathered <i>e.g. by the separate cookies tool on our website</i> —see ' Cookies and other tracking technologies ' below —where we are not required to obtain your consent and do not do so, for our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service to you at the best price
Retaining and evaluating information on your recent visits to our website and how you move around different sections of our website for analytics purposes. This helps us to understand how people use our website so that we can make it more intuitive or to check our website is working as intended	Depending on the circumstances: —your consent as gathered <i>e.g. by the separate cookies tool on our website</i> —see ' Cookies and other tracking technologies ' below —where we are not required to obtain your consent and do not do so, for our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service to you at the best price
Communications with you not related to marketing, including about changes to our terms or policies or changes to the products AND/OR services or other important notices	Depending on the circumstances: —to comply with our legal and regulatory obligations —in other cases, for our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service to you at the best price

Protecting the security of systems and data	We may also use your personal data to ensure the security of systems and data to a standard that goes beyond our legal obligations, and in those cases our reasons are for our legitimate interests or those of a third party, i.e. to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us
Statistical analysis to help us manage our business, e.g. in relation to our financial performance, customer base, product range or other efficiency measures	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service to you at the best price
Marketing our services to existing and former customers	For our legitimate interests or those of a third party, i.e. to promote our business to existing and former customers See ' Marketing ' below for further information
External audits and quality checks, e.g. for the audit of our accounts	For our legitimate interests or those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards
To share your personal data with members of our group and third parties in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency In such cases information will be anonymised where possible and only shared where necessary	Depending on the circumstances: —to comply with our legal and regulatory obligations —in other cases, for our legitimate interests or those of a third party, i.e. to protect, realise or grow the value in our business and assets

See '*Who we share your personal data with*' for further information on the steps we will take to protect your personal data where we need to share it with others.

Marketing

We may use your personal data to send you updates (by email, telephone or post) about our products AND/OR services, including exclusive offers, promotions or new products AND/OR services.

We have a legitimate interest in using your personal data for marketing purposes (see above 'How and why we use your personal data'). This means we do not usually need

your consent to send you marketing information. However, where consent is needed, we will ask for this separately and clearly.

You have the right to opt out of receiving marketing communications at any time by:

- contacting us at info@surecodesoftware.com
- updating your marketing preferences by visiting the link at the bottom of the inbound email

We may ask you to confirm or update your marketing preferences if you ask us to provide further products AND/OR services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will always treat your personal data with the utmost respect and never sell it with other organisations outside the company for marketing purposes.

For more information on your right to object at any time to your personal data being used for marketing purposes, see 'Your rights' below.

Who we share your personal data with

We routinely share personal data with:

- third parties we use to help deliver our products AND/OR services to you, e.g. payment service providers.
- other third parties we use to help us run our business, e.g. marketing agencies or website hosts and website analytics providers.
- our bank.
- our payment services provider.

We or the third parties mentioned above may occasionally also need to share personal data with:

- external auditors, e.g. in relation to the audit of our accounts, in which case the recipient of the information will be bound by confidentiality obligations.
- professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations.

- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations.
- other parties in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency—usually, information will be anonymised, but this may not always be possible, however, the recipient of the information will be bound by confidentiality obligations

If you would like more information about who we share our data with and why, please contact us (see 'How to contact us' below).

How long your personal data will be kept

We will not keep your personal data for longer than we need it for the purpose for which it is used. For example, we retain transaction data only as long as is required by our payment processor.

Different retention periods apply for different types of personal data.

If you stop using your account, we will delete or anonymise your account data after seven years.

Following the end of the of the relevant retention period, we will delete or anonymise your personal data.

Transferring your personal data out of the Isle of Man (IOM)

The EEA, IOM and other countries outside the EEA and the IOM have differing data protection laws, some of which may provide lower levels of protection of privacy.

It is sometimes necessary for us to share your personal data to countries outside the IOM and EEA. In those cases, we will comply with applicable IOM and EEA laws designed to ensure the privacy of your personal data.

For example, we will transfer your personal data to:

- our service providers located outside the IOM in the UK and the United States of America

As we are based in the IOM, we will also transfer your personal data from the EEA to the IOM.

We will also ensure all protections required by applicable IOM and EEA laws are in place before transferring personal data to any organisation or body (or its subordinate bodies) governed by public international law or set up by, or on the basis of, an agreement between two or more countries (international organisations).

Under data protection laws, we can only transfer your personal data to a country outside the IOM/EEA or to an international organisation where:

- in the case of transfers subject to IOM data protection law, the IOM government has decided the particular country ensures an adequate level of protection of personal data (known as an 'adequacy regulation') further to Article 45 of the IOM GDPR. A list of countries the IOM currently has adequacy regulations in relation to is available and includes the Republic of Ireland, and the United States of America.
- in the case of transfers subject to EEA data protection laws, the European Commission has decided that the particular country ensures an adequate level of protection of personal data (known as an 'adequacy decision') further to Article 45 of the EU GDPR. A list of countries the European Commission has currently made adequacy decisions in relation to is available on request.
- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for you, or
- a specific exception applies under relevant data protection law.

Where we transfer your personal data outside the IOM we do so on the basis of an adequacy. In the event we cannot or choose not to continue to rely on either of those mechanisms at any time we will not transfer your personal data outside the IOM unless we can do so based on an alternative mechanism or exception provided by IOM data protection law.

Any changes to the destinations to which we send personal data or in the transfer mechanisms we use to transfer personal data internationally will be notified to you in accordance with the section on 'Change to this privacy policy' below.

For further information about such transfers and the safeguards we employ, including to obtain a copy of the e.g. standard data protection clauses, please contact us OR our Data Protection Officer (see 'How to contact us' below).

Cookies and other tracking technologies

A cookie is a small text file which is placed onto your device (e.g. computer, smartphone or other electronic device) when you use our website. We use cookies and similar technologies, e.g. web beacons, action tags, single-pixel gifs on our website. These help us recognise you and your device and store some information about your preferences or past actions.

For further information on cookies and web beacons, action tags, single-pixel gifs, please refer to our use of 'cookies' and/or to relevant similar technologies, when we will request your consent before placing them and how to disable them, please see our Cookie Policy.

Your rights

You generally have the following rights, which you can usually exercise free of charge:

Access to a copy of your personal data	The right to be provided with a copy of your personal data A more detailed explanation of this right under IOM law is available here
Correction (also known as rectification)	The right to require us to correct any mistakes in your personal data A more detailed explanation of this right under IOM law is available here
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations A more detailed explanation of this right under IOM law is available here
Restriction of use	The right to require us to restrict use of your personal data in certain circumstances, e.g. if you contest the accuracy of the data

	A more detailed explanation of this right under IOM law is available here
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations A more detailed explanation of this right under IOM law is available here
To object to use	The right to object: —at any time to your personal data being used for direct marketing (including profiling) —in certain other situations to our continued use of your personal data, e.g. where we use your personal data for our legitimate interests. A more detailed explanation of this right under IOM law is available here
Not to be subject to decisions without human involvement	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you We do not make any such decisions based on data collected by our website. A more detailed explanation of this right under IOM law is available here

For further information on each of those rights, including the circumstances in which they do and do not apply, please contact us (see ‘How to contact us’ below). You may also find it helpful to refer to the guidance from the IOM’s Information Commissioner on your rights under the IOM GDPR.

If you would like to exercise any of those rights, please email, call or write to us—see below: ‘*How to contact us*’. When contacting us please:

- provide enough information to identify yourself (e.g. your full name, address and customer or matter reference number) and any additional identity information we may reasonably request from you, and
- let us know which right(s) you want to exercise and the information to which your request relates.

Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it.

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

How to complain

Please contact us if you have any queries or concerns about our use of your information (see below 'How to contact us'). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the Information Commissioner.

The IOM's Information Commissioner may be contacted at

<https://www.inforights.im/complaint-handling/how-to-make-a-complaint-to-the-information-commissioner/> or by telephone: +44 1624 693260

Changes to this privacy policy

We may change this privacy policy from time to time—when we make significant changes, we will take steps to inform you, for example via our website and where necessary by email.

How to contact us

You can contact us and/or our Data Protection Officer by post or email or if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law, or to make a complaint.

Our contact details are shown below:

Our contact details	Our Data Protection Officer's contact details

Surecode Limited, Mountain View Innovation
Centre, Jurby Road, Ramsey, Isle of Man, IM7
2DZ

info@surecodesoftware.com

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