Privacy Policy

Simplifi Solutions Limited ("**Simplifi Solutions**", "**We**" or "**Us**") is committed to ensuring that your privacy is protected. This privacy policy explains how we use the information we collect about you (or that you provide us with), how you can instruct us if you prefer to limit the use of that information and procedures that we have in place to safeguard your privacy.

For the purpose of the Data Protection Act 1998, the General Data Protection Regulation (Regulation (EU) 2016/679) ("**GDPR**") and any other data protection legislation applicable in the UK from time to time (the "**Data Protection Laws**"), the data controller is Simplifi Solutions Limited whose registered office is at A C Plastics, Wilson Road, Liverpool, England, L36 6AN.

You can contact us using our <u>Contact Us form</u> at <u>info@simplifi-solutions.co.uk</u> with any questions you may have about privacy or data protection.

Please note that links from our website may take you to external websites not covered by this policy. We recommend that you check their privacy policies yourself before submitting any personal information to such websites. We will not be responsible for the content, function or information collection policies of these external websites.

1. The information we collect and how we collect it

You are not required (by law or by any contract with us) to provide personal information to us via this website. We will only require you to provide personal information to us where it is necessary for us to provide you with a service (such as where you use our software, create an account with us or subscribe to our mailing list).

Information you provide to us

We may receive personal information about you whenever you contact us. For example, by doing the following:

- creating and using a registered account on our website
- using and browsing our website
- using our software
- contacting us via our Contact Us form
- using our "Simplifi A Register" service
- telephoning, texting, writing by post or emailing us

This information may include the following:

• normal identification information, such as your full name, date of birth, age, gender, marital status;

- contact information, such as your postal address, email address and telephone number;
- additional information relevant to your use of our site and services, or your event or services, such as your marketing preferences, survey responses and feedback

Please note that we will not store credit or debit card information from payments made through our services.

Information we collect about you from other sources

We may collect information about you from other sources. This may include the following:

- Publicly available information, from sources such as social media sites and Companies House
- Information you have shared publicly, including on social media

This list is not exhaustive and, in specific instances, we may need to collect additional data for the purposes set out in this policy.

Information we receive about you from other sources

Sometimes you will have given your consent for other websites, services or third parties to provide information to us.

It could also include information from third parties that we work with to provide our products and services, such as PR agencies, payment processors, delivery companies, technical support companies and advertising companies. Whenever we receive information about you from these third parties, we will let you know what information we have received and how and why we intend to use it.

2. How do we use the personal information we collect?

We take data protection law seriously, so below we have set out exactly how and why we use your information, and what our legal basis is to be able to use your information in each way.

We need all the categories of information listed above to allow us to enter into and perform our contract with you*, to enable us to comply with legal obligations**, and in order to pursue legitimate interests of our own or those of third parties*** (provided your interests and fundamental rights do not override those interests). The situations in which we will process your personal data are listed below. We have indicated by asterisks the purpose or purposes for which we are processing or will process your personal information.

	Perform Our Contract With You	Comply With Legal Obligations	Pursue Legitimate Interests
Verifying your identity	✓	\checkmark	✓

Making a decision to supply our services	\checkmark		
Determining the terms of purchase of our software	\checkmark		
Administering the contract we have entered into with you	\checkmark		
To contact you about the latest developments in the	\checkmark		
legislation which you have expressed an interested in			
To contact you about any additional products or services or			\checkmark
other offers you have expressed an interest in			
To contact you in the event of any issues with your use of	\checkmark		\checkmark
our site or our software	62		
Dealing with any complaints you may have	~		✓
Business management and planning, including accounting and auditing		\checkmark	\checkmark
Making arrangements for the termination of our contract	\checkmark		\checkmark
Making repairs, alterations and improvements to the	\checkmark	\checkmark	\checkmark
services supplied			
Dealing with legal disputes involving you		\checkmark	\checkmark
Complying with health and safety obligations	\checkmark	\checkmark	\checkmark
To detect and prevent fraud, money-laundering and other crimes		\checkmark	
To review and improve the performance of our systems, processes and staff (including training)			✓
To monitor your use of our systems to ensure compliance with our IT policies			~
To ensure network and information security, including preventing unauthorised access to our computer and			✓
electronic communications systems and preventing malicious software distribution			
To conduct data analytics studies to review and better understand users use of our website			√

To interact and respond to any communications you send us, including social media posts that you tag us in		\checkmark
To let you know about any important changes to our		\checkmark
business or policies		
To ensure that the information that we hold about you is		\checkmark
accurate and up to date		
To protect your interests, or the interests of others (such as	\checkmark	\checkmark
in the event of criminality such as identity theft, piracy or		
fraud)		

Providing our services

It is necessary for us to use personal information about you to enter into and perform the contracts that we make with you, such as when you subscribe to use our software, you subscribe to use our "Simplifi A Register" service or you contact us via our <u>Contact Us</u> form. Using your information in this context is necessary so that we can:

- provide you with a suitable solution for managing your Environmental, Health and Safety compliance obligations
- provide you with information about the legislation you have expressed an interest in
- provide you with information on the latest developments in the health and safety sector
- verify your identity
- deal with any complaints you may have
- contact you about any changes to your use of our software or that we make to our products or services
- administer our website, including troubleshooting problems, analysing statistics, conducting research and tests and keeping the site secure

Where you create your account, or you obtain from us any other service that we offer free of charge, it is necessary for us to use your personal information and we have a legitimate interest in providing these services to you. Using your information is necessary so that we can:

- provide you with information about our products and services that may be of interest; and
- provide you with other news and information from Simplifi Solutions.

Telling you about other products or services that we think may be of interest to you

We may use your information to identify and tell you about our products or services that we think may be of interest to you. We will only do this where you have informed us that you would like to receive marketing communications.

We may also use your information to invite you to participate in market research. If we do contact you about market research, you do not have to participate. If you tell us that you do not want to receive market research communications, we will respect this.

Whether you choose to receive marketing communications, or market research communications is entirely up to you. You can choose to receive both, none, or just one or the other. Your choice will not affect any products or services that you have purchased from us, nor will it affect any quotes for products or services you buy in future.

You can update your preferences by using the links in any of our emails to you, or by getting in touch with us.

Telling you about products or services that are similar to ones that you have already bought

If you have already bought a product or service from us, for example you have purchased our software, we have assisted you in the creation of a register or have responded to any queries you have submitted using our <u>Contact Us</u> form, we may contact you with some information about products or services that are similar.

We will only contact you by email or text message and you can choose not to receive these messages at any time. Simply follow the instructions in the message, or get in touch with us at Support1@simplifi-solutions.co.uk

Making our business better

We always want to offer the best products, services and experience that we can. Sometimes this means we may use your information to find ways that we can improve what we do, or how we do it.

In this context, we will only use your information where it is necessary so that we can:

- review and improve our existing products and services and develop new ones;
- review and improve the performance of our systems, processes and staff (including training);
- improve our software to ensure that content is present in the most effective manner for you and your computer;
- improve our site to ensure that content is presented in the most effective manner for you and for your computer; and
- measure and understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.

Contacting you

We want to stay in touch with you. Sometimes we may need to use the information that we have about you in order to respond to your questions or let you know about important changes.

We will only use your information in this respect where it is necessary so that we can:

- interact and respond to any communications you send us, including where you use our <u>Contact</u>
 <u>Us</u> form and any social media posts that you tag us in
- let you know about any important changes to our business or policies

Verifying your identity

We may use your information where it is necessary for us to do so in order to meet our legal obligations or to detect and prevent fraud, money laundering and other crimes.

Protecting you and others from harm

We may use your information where it is necessary to protect your interests, or the interests of others. This may include in the event of criminality such as identity theft, piracy or fraud.

3. Who do we share your personal information with?

Sharing your information within our company

We share the information that you provide to us with our staff so that we can provide our products and services to you.

Sharing your information with third parties

We will not generally share your personal information with any third parties.

In addition to the above, there are certain exceptional circumstances in which we may disclose your information to third parties. This would be where we believe that the disclosure is:

- required by the law, or in order to comply with judicial proceedings, court orders or legal or regulatory proceedings;
- necessary to protect the safety of our employees, our property or the public;
- necessary for the prevention or detection of crime, including exchanging information with other companies or organisations for the purposes of fraud protection and credit risk reduction; and
- proportionate as part of a merger, business or asset sale, in the event that this happens we will share your information with the prospective seller or buyer involved.

4. IP Addresses and Cookies

We may collect information about your computer, including where available your IP address, operating system and browser type for system administration. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer, such as Google Analytical. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. The information we collect includes which pages you view and which links you follow, details of the hardware and software that you are using to access the site and any passwords that you use on our website. This enables us to:

- estimate our audience size and usage pattern.
- store information about your preferences, and so allow us to customise our site according to your individual interests.
- speed up your searches.
- recognise you when you return to our site.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting, you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

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

5. Where we store your personal data

All information you provide to us is stored on our secure servers within the UK. Any payment transactions will be encrypted (using SSL technology). Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

6. Disclosure of your information

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Simplifi Solutions or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of Simplifi Solutions, our customers, or others. This includes

exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

7. Updating your details

All personal information provided to Simplifi Solutions can be edited and changed by you at any time by logging into your account.

8. Your rights

You have the right to cancel your membership

You have the right to cancel your account at any time. This can be done by logging into your account and reviewing the cancellation options.

You have the right to be informed

We have a legal obligation to provide you with concise, transparent, intelligible and easily accessible information about your personal information and our use of it. We have written this policy to do just that, but if you have any questions or require more specific information, you can get in touch with us.

You have the right to access your personal data

You have the right to ask us to confirm whether or not we hold any of your personal information. If we do, you have the right to have a copy of your information and to be informed of the following:

- why we have been using your information;
- what categories of information we were using;
- who we have shared the information with; and
- how long we envisage holding your information

In order to maintain the security of your information, we will have to verify your identity before we provide you with a copy of the information we hold.

The first copy of your information that you request from us will be provided free of charge, if you require further copies we may charge an administrative fee to cover our costs.

You have the right to correct any inaccurate or incomplete personal data

Where you have requested a copy of the information we hold about you, you may notice that there are inaccuracies in the records, or that certain parts are incomplete. If this is the case, you can <u>Contact Us</u> so that we can correct our records.

You have the right to be forgotten

There may be times where it is no longer necessary for us to hold personal information about you. This could be if:

- the information is no longer needed for the original purpose that we collected it for
- you withdraw your consent for us to use the information (and we have no other legal reason to keep using it)
- you object to us using your information and we have no overriding reason to keep using it
- we have used your information unlawfully
- we are subject to a legal requirement to delete your information

In those situations you have the right to have your personal data deleted. If you believe one of these situations applies to you, please get in touch using our <u>Contact Form</u>.

You have the right to have a copy of your data transferred to you or a third party in a compatible format

Also known as data portability, you have the right to obtain a copy of your personal data for your own purposes. This right allows you to move, copy or transfer your personal data more easily from one IT system to another, in a safe and secure way.

This right shall only apply where:

- we are processing your information for the purposes of entering into or performing a contract; or
- you have provided consent for us to process your information.

If you would like us to transfer a copy of your data to you or another organisation in a structured, commonly use and machine-readable format, please <u>contact us</u>. There is no charge for you exercising this right.

You have the right to object to direct marketing

You can tell us at any time that you would prefer that we do not use your information for direct marketing purposes. If you would not like to receive any direct marketing from us, please <u>Contact Us</u> or use the links provided in any of our marketing communications, and we will stop sending direct marketing immediately.

You have the right to object to us using your information for our own legitimate interests

Sometimes, we use your personal information to achieve goals that will help us as well as you. This includes:

- when we tell you about products or services that are similar to ones that you have already bought;
- when we use you information to help us make our business better; and
- when we contact you to interact, communicate or let you know about changes we are making.

We aim to always ensure that your rights and information are properly protected. If you believe that the way we are using your data is not justified due to its impact on you or your rights, you have the right to object. Unless we have a compelling reason to continue, we must stop using your personal data for these purposes.

In order to exercise your right to object to our use of your data for the purposes above, please <u>Contact</u> <u>Us</u>.

You have the right to restrict how we use your personal data

You have the right to ask us to stop using your personal data in any way other than simply keeping a copy of it. This right is available where:

- you have informed us that the information we hold about you is inaccurate, and we have not yet been able to verify this;
- you have objected to us using your information for our own legitimate interests and we are in the process of considering your objection;
- we have used your information in an unlawful way, but you do not want us to delete your data; or
- we no longer need to use the information, but you need it for a legal claim.

If you believe any of these situations apply, please contact us at Support1@simplifi-solutions.co.uk

You have rights related to automated-decision making and profiling

Any automated decision-making or profiling we undertake is solely for the purpose of tailoring the information which we provide to you. We will not use automated decision-making or profiling to make any decisions which will have a legal effect upon you or otherwise significantly affect you, and you have the right not to be subject to such decisions. If you have any concerns or questions about this right, please contact us at Support1@simplifi-solutions.co.uk

9. Changes to this Privacy Policy

If we change our privacy policy, we will post the changes on this page, and may place notices on other pages of the website, so that you may be aware of the information we collect and how we use it at all times. We will also contact you to inform you that changes have been made to this policy. Regularly reviewing this page will ensure that you are always aware of what information we collect and how we use it. Continued use of the service will signify that you agree to any such changes.

10. Contacting Simplifi Solutions and making a complaint

We welcome your views about our website and our privacy policy. If you would like to contact us with any queries or comments, or to complain about our collection or use of your personal data, please <u>Contact Us.</u>

In addition, you have the right to lodge a complaint with the Information Commissioner's Office (ICO), the statutory body which oversees data protection law in the UK. Please visit the <u>ICO website</u> if you wish to lodge a complaint with the ICO.