

## SoS Consultancy Ltd Privacy Policy

SoS Consultancy Ltd (SoS) is committed to protecting the security and privacy of your personal data and ensuring that we conduct our business in compliance with laws on privacy, data protection and data security. We hope that the information in this policy will help you to understand what information SoS Consultancy Ltd. may collect and how we may use, protect and share it.

This policy only applies to SoS Consultancy Ltd. ([www.soscl.co.uk](http://www.soscl.co.uk)) and does not extend to the practices of other websites that we may link to, companies that we do not own or control, and to people that we do not employ or manage.

### What information does SoS Consultancy Ltd. collect?

**Personally identifiable information** SoS only collects the personally identifiable information that you provide to us. We do not collect any personally identifiable information about you, such as your name, address, telephone number or email address (“Personal Information”) unless you provided it. In some cases, you provide this information to us directly. In other cases, you provide this information to us through our partners. SoS will not knowingly collect or use any Personal Information collected from children for any purpose whatsoever. The Personal Information we collect, includes (see list below for further definitions):

- name (optional)
- gender (optional)
- employer (optional)
- department (optional)
- jobtitle (optional)
- business-info.postal (optional)
- business-info.telecom.telephone (optional)
- business-info.online.email (optional)

### Purpose and lawful basis

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
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 (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 administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(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 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	(a) Identity	Necessary for our legitimate interests (to study how customers use our products/services, to

understand the effectiveness of the advertising we serve to you	(b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	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	Necessary for our legitimate interests (to develop our products/services and grow our business)

**Non-personally identifiable information**<sup>[1][SEP]</sup>In addition to Personal Information, SoS may also collect information that is not personally identifying (e.g., type of Internet browser and computer operating system used; domain name of the website from which you came; number of visits, average time spent, pages viewed). This information is used by us to improve our website content, customer experience and business practices. We may collect the following non-personally identifiable information:

- clickstream
- http
- clientevents
- searchtext
- interactionrecord
- cookies
- miscdata

**Cookies**<sup>[1][SEP]</sup>Cookies are a technology that can be used to provide you with tailored information on a website. When you visit our website, we may store some information on your computer that ensures we recognize you the next time you return to our site. You can set your browser to off or to notify you when you receive a cookie, giving you the chance to decide whether to accept it. Our Web site may use the following cookies: name="\*" value="\*" domain="\*" path="\*\*"

#### How do we protect the information we collect?

SoS takes precautions that are consistent with industry practices to ensure the security of your Personal information. We strive to protect your Personal Information from loss, destruction, falsification, manipulation and unauthorized access or disclosure.

#### How do we use the information we collect?

When you provide us with Personal Information, we use it to respond to your enquiries, process your transactions, provide you with access to certain information or to generally support our business relationship. This information may also be used to improve our website content, customer experiences and business practices. In some cases, SoS's website contains links to other websites. SoS is not responsible for the privacy practices or the content of any websites other than its own.

We collect information for the following reasons:

- Completion and support of current activity
- Website and system administration
- Research and development

- One-time tailoring
- Pseudonymous analysis
- Pseudonymous decision
- Individual analysis
- Individual decision
- Contacting visitors for marketing of services or products
- Historical preservation
- Contacting visitors for marketing of services or products via telephone

#### **How do we share the information we collect?**

We may share your Personal Information with our affiliates and with our partners, including our subcontractors and other third-party providers, in order to support the uses mentioned above, and such third-party providers may follow different Personal Information practices.

#### **How we use IP Tracking**

We use IP Address tracking technology to identify businesses visiting our site and the pages that are being used. This helps us analyse data about web page traffic in order to develop and improve our website for business visitors.

#### **Are there any exceptions?**

SoS will only disclose your Personal Information, without your consent, if we are:

- Required to by law; or
- Must do so in support or protecting our own rights, such as to collect monies owed or to seek legal remedies.

In either case, SoS will only disclose the Personal Information to the extent required. We are not required to protect Personal Information that is publicly available.

#### **Controlling your personal information and your rights**

The GDPR safeguards the following rights for individuals:

##### **The right to be informed**

##### **The right of access**

##### **The right to rectification**

##### **The right to erasure**

##### **The right to restrict processing**

##### **The right to data portability**

##### **The right to object**

Rights in relation to automated decision making and profiling.

We provide individuals with all the following privacy information:

- The name and contact details of our organisation.
- The name and contact details of our representative (if applicable).
- The contact details of our data protection officer (if applicable).
- The purposes of the processing.
- The lawful basis for the processing.

- The legitimate interests for the processing (if applicable).
- The categories of personal data obtained (if the personal data is not obtained from the individual it relates to).
- The recipients or categories of recipients of the personal data.
- The details of transfers of the personal data to any third countries or international organisations (if applicable).
- The retention periods for the personal data.
- The rights available to individuals in respect of the processing.
- The right to withdraw consent (if applicable).
- The right to lodge a complaint with a supervisory authority.
- The source of the personal data (if the personal data is not obtained from the individual it relates to).
- The details of whether individuals are under a statutory or contractual obligation to provide the personal data (if applicable, and if the personal data is collected from the individual it relates to).
- The details of the existence of automated decision-making, including profiling (if applicable).