

# Comprobo Privacy Policy

This privacy policy outlines how Comprobo uses and protects any information that you provide to Comprobo when you use our systems. Comprobo is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement. Comprobo may change this policy from time to time by updating this page, so please refer back to this page from time to time to ensure that you are happy with any alterations made. This policy is effective from 24<sup>th</sup> May 2018.

## What we collect

Comprobo collects information in two ways: (1) passively (for example through our website's technology) and (2) actively (for example if you fill out your details on our contact form). We may collect the following information either actively or passively:

- Name, job title and organisation.
- Contact information including email address.
- Demographic information such as country, preferences and interests.
- Other information relevant to customer surveys, promotions, downloads, participation in events and/or offers.
- Responses to surveys that we distribute in which you elect to participate.
- Any postings, comments or other content that you upload or post to the Comprobo website.
- Information about your computer, including (where available) your IP address, operating system and browser type. This is typically for system administration purposes, to filter website traffic, to look up user domains and to report on statistics.
- Data about visits you have made to our website and the resources that you access (including but not limited to, traffic data, location data, weblogs and other communication data) – please see the section on cookies below.

## What we do with the information we gather

We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- Internal record keeping.
- We may use the information to improve our products and services.
- We may periodically send promotional email about new products, newsletters, special offers or other information which we think you may find interesting using the email address which you have provided.
- From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone, fax or mail.
- We may use the information to customise the website according to your interests.

- We may provide your information to our third-party partners for follow up, marketing or promotional purposes.
- In the event of a sale, merger, liquidation, receivership or transfer of all or substantially all of the assets of Comprobo, we reserve the right to transfer information including some or all of your personal data collected to a third party provided that the third party agrees to abide by the terms of this Privacy Policy. In the event of such transfer you will be notified and given the opportunity to opt-out.
- If you contact Comprobo to inquire about employment opportunities, we may collect and store the information you provide for recruiting purposes. Because different jurisdictions have different privacy laws and we are committed to complying with such laws, if you send us your CV/Resume you are consenting to the following conditions respecting the use of your CV/Resume by Comprobo: (1) Comprobo, its affiliates, and agents will store, access, and use the information in any jurisdiction, including jurisdictions whose privacy laws may be different and less protective than those of your home jurisdiction; and (2) Comprobo, its affiliates and agents, may use this information to evaluate your eligibility for employment and to contact you for recruiting purposes. Please note that people under 18 years old are not authorized to submit recruiting information on our site.
- We will never sell your information.

## **Sensitive Personal Data**

We do not generally seek to collect sensitive personal data through our website. If we do seek to collect such data, we will ask you to expressly consent to our proposed uses of the data. If you provide us with unsolicited sensitive personal data, you are consenting to our use of that data subject to applicable law. The references to “sensitive personal data” are to the various categories of personal data identified by European and other data privacy laws as requiring special treatment, including in some circumstances the need to obtain explicit consent. These categories comprise personal identity numbers, personal data about personality and private life, racial or ethnic origin, nationality, political opinions, membership of political parties or movements, religious, philosophical or other similar beliefs, membership of a trade union or profession or trade association, physical or mental health, genetic code, addictions, sexual life, property matters or criminal record (including information about suspected criminal activities).

## **Security**

We are committed to ensuring that your information is secure and we have put in place various physical, electronic and managerial procedures to safeguard and secure the information we collect online. You should however understand that the open nature of the Internet is such that information and personal data may flow over networks connecting you to our systems without security measures and may be accessed and used by people other than those for whom the data is intended.

## **How we use cookies**

A cookie is a small file which asks permission to be placed on your computer’s hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets

you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes.

Cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us such as navigation through our website. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

## **Links to other websites**

Our website may contain links to enable you to visit other websites of interest. Once you have used these links to leave our site, you should note that we do not have any control over that third party website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

## **Controlling your personal information**

You may choose to restrict the collection or use of your personal information in the following ways:

- By not providing personal details if you do not wish us to follow up on a particular request you have.
- If you have previously provided us with personal information thus agreeing for us to use it as outlined in this policy, you may change your mind at any time by writing to or emailing us at [dpo@comprobo.co.uk](mailto:dpo@comprobo.co.uk)

We will not sell, distribute or lease your personal information to third parties unless we have your permission or we have to comply with a legal obligation, or to enforce or apply our Terms of Use; or to protect the rights, property, or safety of Comprobo, our clients, or others.

We may provide information we collect that does not allow you to be personally identified ("Aggregate Information") to third parties, including without limitation, information about your access and use of the site. For example, we might provide such Aggregate Information to a third party to inform the party of the number of users of the site and the activities that they conduct while on the site.

You may request details of personal information which we hold about you under the Data Protection Act 1998. A small fee will be payable. If you would like a copy of the information held on you please write to [dpo@comprobo.co.uk](mailto:dpo@comprobo.co.uk).

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect.

If you have any questions or concerns regarding this Privacy Policy, please contact us at [dpo@comprobo.co.uk](mailto:dpo@comprobo.co.uk).