



# Privacy Policy

Version 1.4

# Privacy Policy

## CONTENTS

|  |    |
|--|----|
| !  |    |
| <u>Table of Contents</u> .....   | 1  |
| <u>Summary</u> .....   | 2  |
| <u>Our Details</u> .....   | 3  |
| <u>Information We Collect When You Vist Our Website</u> .....                                | 4  |
| <u>Information We Collect When You Contact Us</u> .....                                      | 5  |
| <u>Information We Collect When You Interact With Our Website</u> .....                       | 8  |
| <u>How We Collect or Obtain Information About You From Third Parties</u> .....               | 8  |
| <u>Disclousre and Additional Uses Of Your Information</u> .....                              | 10 |
| <u>How Long We Retain Your Information</u> .....   | 15 |
| <u>How We Secure Your Information</u> .....  | 16 |
| <u>Transfers of Your Information Outside the European Economic Area</u> .....                | 16 |
| <u>Your Rights in Relation to Your Information</u> .....                                     | 18 |
| <u>Your Right to Object to the Processing of Your Information For Certain Purposes</u> ..... | 19 |
| <u>Sensitive Personal Information</u> .....  | 20 |
| <u>Changes to Our Privacy Policy</u> .....   | 20 |
| <u>Children’s Privacy</u> .....  | 21 |
| <u>California Do Not Track Disclosures</u> .....   | 21 |
| <u>Copyright, Credit and Logo</u> .....  | 22 |

# Privacy Policy

## Summary

This section summarises how we obtain, store and use information about you. It is intended to provide a very general overview only. It is not complete in and of itself and it must be read in conjunction with the corresponding full sections of this Privacy Policy.

- **Data controller:** SCB Global Ltd
- **How we collect or obtain information about you:**
  - When you provide it to us (e.g. by contacting us, placing an order, downloading a brochure or white paper from the website, requesting a call back on the website, from your use of our website). We use cookies and or similar technologies only for site optimization and to understand more about your requirements
  - We do not use data collected by third parties and we do not release any information about you to third parties.
- **Information we collect** name, contact details, payment information e.g. your bank details, IP address, company name or business name or individual's name, VAT number, *phone numbers, email addresses, call data records.*
- **How we use your information:** for administrative and business purposes (particularly to contact you, invoice you and process orders), to improve our business, to fulfil our contractual obligations, to advertise our goods and services, and in connection with our legal rights and obligations
- **Disclosure of your information to third parties:** only to the extent necessary to run our business, to our service providers and subcontractors, to fulfil any contracts we enter into with you, where required by law or to enforce our legal rights
- **Do we sell your information to third parties (other than in the course of a business sale or purchase or similar event):** No.
- **How long we retain your information:** for no longer than necessary, taking into account any legal obligations we have (e.g. to maintain records for tax purposes), any other legal basis we have for using your information (e.g. your consent, performance of a contract with you or our legitimate interests as a business).

# Privacy Policy

- **How we secure your information:** using appropriate technical and organisational measures such as storing your information on secure servers and only granting access to your information where necessary and in the performance of conducting our business.
- **Use of cookies:** We use cookies on our website. We use cookies and or similar technologies only for site optimization and to understand more about your requirements. By consenting to cookies you consent to our Google Analytics collecting data.
- **Transfers of your information outside the UK and European Economic Area:** We will only transfer your information outside the European Economic Area if we are required to do so by law or for the performance of running our business efficiently.
- **Use of automated decision making and profiling:** we do not use automated decision making and/or profiling.
- **Your rights in relation to your information**
  - to access your information and to receive information about its use
  - to have your information corrected and/or completed
  - to have your information deleted
  - to restrict the use of your information
  - to receive your information in a portable format
  - to object to the use of your information
  - to withdraw your consent to the use of your information
  - to complain to a supervisory authority
  -
- **Sensitive personal information:** we do not knowingly or intentionally collect what is commonly referred to as 'sensitive personal information'. Please do not submit sensitive personal information about you to us. For more information, please see the main section below entitled Sensitive Personal Information.

## Our details

The data controller in respect of our website is SCB Global Ltd (Company registration number: 08587801). You can contact the data controller by writing to 37<sup>th</sup> Floor, One Canada Square, Canary Wharf London E14 5AA or by sending an email to [Info@scb-global.com](mailto:Info@scb-global.com).

If you have any questions about this Privacy Policy, please contact the data controller.

## Information we collect when you visit our website

We collect and use information from website visitors in accordance with this section and the section entitled Disclosure and additional uses of your information.

# Privacy Policy

## Information we collect when you visit our website

We collect and use information from website visitors in accordance with this section and the section entitled Disclosure and additional uses of your information.

### Web server log information

We use a third party server to host our website called 123-Reg Ltd, the privacy policy of which is available here: [www.123-reg.co.uk/terms/privacy.shtml](http://www.123-reg.co.uk/terms/privacy.shtml). Our server only logs and stores the information that you voluntarily fill in within the various forms located on our web pages.

The servers are located in United Kingdom and within the European Economic Area. To fulfill client service obligations and fulfill its Client service obligations it could be necessary for 123 Reg to transfer and process personal data outside the UK and European Economic Area (EEA) in which the personal data is collected. This will include transfers to 123 Reg affiliates based in the United States. Prior to making any such transfer 123 Reg SCB Global will put in place security procedures and firewalls designed to prevent unauthorised use of or access to personal data. For further information and information on the safeguards used, please see the section of this privacy policy entitled Transfers of your information outside the UK and European Economic Area

### Use of website server log information for IT security purposes

Our third-party hosting provider collect(s) and store(s) server logs to ensure network and IT security and so that the server and website remain uncompromised. This includes analysing log files to help identify and prevent unauthorised access to our network, the distribution of malicious code, denial of services attacks and other cyber-attacks, by detecting unusual or suspicious activity. Unless we are investigating suspicious or potential criminal activity, we do not make, nor do we allow our hosting provider to make, any attempt to identify you from the information collected via server logs.

**Legal basis for processing:** compliance with a legal obligation to which we are subject (Article 6(1)(c) of the General Data Protection Regulation).

**Legal obligation:** we have a legal obligation to implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk of our processing of information about individuals. Recording access to our website using server log files is such a measure.

**Legitimate interests:** we and our third-party hosting provider have a legitimate interest in using your information for the purposes of ensuring network and information security.

.

# Privacy Policy

## **Use of website server log information to analyse website use and improve our website**

We do not use the information collected by our website server logs to analyse how our website users interact with our website.

**Legal basis for processing:** our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

**Legitimate interest:** improving our website for our website users and getting to know our website users' preferences so our website can better meet their needs and desires.

## **Cookies and similar technologies**

We use cookies or similar technologies on our website. We use cookies and or similar technologies only for site optimization and to understand more about your requirements

## **Information we collect when you contact us**

### **Email**

When you send an email to the email address displayed on our website, we collect your email address and any other information you provide in that email (such as your name, telephone number and the information contained in any signature block in your email).

**Legitimate interest(s):** responding to enquiries and messages we receive and keeping records of correspondence.

**Legal basis for processing:** necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

**Reason why necessary to perform a contract:** where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

# Privacy Policy

## Transfer and storage of your information

We use a third-party email provider to store emails you send us. Our third-party email provider is Google. Their privacy policy is available here: [policies.google.com/privacy](https://policies.google.com/privacy)

Emails you send us will be stored on our third party email provider's servers which could be in the European Economic area or transferred outside For further information please see the section of this privacy policy entitled Transfers of your information outside the European Economic Area.

## Contact form

When you contact us using our contact form, we collect *email address, contact telephone number and Company name*. We also collect any other information you provide to us when you complete the contact form including any requirements laid out.

If you do not provide the mandatory information required by our contact form, you will not be able to submit the contact form and we will not receive your enquiry.

**Legitimate interest(s):** responding to enquiries and messages we receive and keeping records of correspondence.

**Legal basis for processing:** necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

**Reason why necessary to perform a contract:** where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

## Transfer and storage of your information

We use a third-party email provider to store emails you send us. Our third-party email provider is Google. Their privacy policy is available here: [policies.google.com/privacy](https://policies.google.com/privacy)

Emails you send us will be stored on our third-party email provider's servers which could be in the European Economic area or transferred outside For further information please see the section of this privacy policy entitled Transfers of your information outside the European Economic Area.

# Privacy Policy

## Phone

When you contact us by phone, we collect your phone number and any information provide to us during your conversation with us.

We may record phone calls for quality and training purposes.

**Legitimate interest(s):** responding to enquiries and messages we receive and keeping records of correspondence.

**Legal basis for processing:** necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

**Reason why necessary to perform a contract:** where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

## Transfer and storage of your information

Information about your call, such as your phone number and the date and time of your call, is processed by us and our third party telephone service provider, which is located in United Kingdom

Information about your phone call will be stored by us or our third party telephone service provider within the European Economic Area. [For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.]

## Post

If you contact us by post, we will collect any information you provide to us in any postal communications you send us.

**Legitimate interest(s):** responding to enquiries and messages we receive and keeping records of correspondence.

**Legal basis for processing:** necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

**Reason why necessary to perform a contract:** where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).



# Privacy Policy

## Information we collect when you interact with our website

We collect and use information from individuals who interact with particular features of our website in accordance with this section and the section entitled Disclosure and additional uses of your information.

## Our goods and services

You can opt in to receiving marketing communications from us in relation to our goods and services by email, text message and by post by indicating that you would like to receive such communications. We will send you marketing communications in relation to our goods and services only if you opt-in to receive them.

**Legal basis for processing:** consent (Article 6(1)(a) of the General Data Protection Regulation).

**Consent:** you give your consent to us sending you information about our goods and services by signing up to receive such information in accordance with the steps described above.

## Information collected or obtained from third parties

### Information received from third parties

Generally, we do not receive information about you from third parties. The third parties from which we receive information about you will generally include *business partners or affiliates*. We will ask our third parties and affiliates to also observe the GDPR laws and regulations.

It is also possible that third parties with whom we have had no prior contact may provide us with information about you. If this occurs, we shall discard that information by deleting or destroying it and we shall not use it for any purpose.

**Legal basis for processing:** necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

**Reason why necessary to perform a contract:** where a third party has passed on information about you to us (such as your name and email address) in order for us to provide services to you, we will process your information in order to take steps at your request to enter into a contract with you and perform a contract with you (as the case may be).

# Privacy Policy

**Consent:** where you have asked that a third party to share information about you with us and the purpose of sharing that information is not related to the performance of a contract or services by us to you, we will process your information on the basis of your consent, which you give by asking the third party in question to pass on your information to us.

**Legitimate interests:** where a third party has shared information about you with us and you have not consented to the sharing of that information, we will not process that information for any purpose other than to fulfil our contractual obligations or the privileges that we enjoy under statutory rights. For example, we would have a legitimate interest in processing your information to perform our obligations under a sub-contract with the third party, where the third party has the main contract with you. Our legitimate interest is the performance of our obligations under our sub-contract. Similarly, third parties may pass on information about you to us if you have infringed or potentially infringed any of our legal rights. In this case, we will have a legitimate interest in processing that information to investigate and pursue any such potential infringement.

## **Where we receive information about you in error**

If we receive information about you from a third party in error and/or we do not have a legal basis for processing that information, we will delete your information as soon as possible.

## **Information obtained by us from third parties**

In certain circumstances (for example, to verify the information we hold about you or obtain missing information we require to provide you with a service) we will obtain information about you from certain publicly accessible sources, both EU and non-EU, such as the electoral register, Companies House, online customer databases, business directories, media publications, social media and websites (including your own website if you have one).

**Legal basis for processing:** necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

**Reason why necessary to perform a contract:** where you have entered into a contract or requested that we enter into a contract with you, in certain circumstances, we will obtain information about you from public sources in order to enable us to understand your business and provide services to you or services to a sufficient standard. For example, we would obtain and/or verify your email address from your website or from a directory where you ask us to send you information by email but we do not possess the information or we need to confirm that we have recorded your email address correctly.

# Privacy Policy

**Legitimate interests:** in certain circumstances, we will have a legitimate interest in obtaining information about you from public and private sources. For example, if you have infringed or we suspect that you have infringed any of our legal rights, we will have a legitimate interest in obtaining and processing information about you from such sources in order to investigate and pursue any suspected or potential infringement.

## Automated decision making

Automated decision making is decision making by technological means (i.e. by a machine) without human involvement. We do not use automated decision making.

## Profiling

Profiling is any form of automated processing of your information to evaluate personal aspects about you, in particular to analyse or predict things like your performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements. We do not use any profiling on our website.

## Disclosure and additional uses of your information

### Disclosure of your information to service providers

We use a number of third parties to provide us with services which are necessary to run our business or to assist us with running our business and who process your information for us on our behalf]. Your information will be shared with these service providers where necessary to provide you with the service you have requested, whether that is accessing our website or ordering goods and services from us.

We do not display the identities of our service providers publicly by name for security and competitive reasons. If you would like further information about the identities of our service providers, however, please contact us directly via our contact form] or by email [info@scb-global.com](mailto:info@scb-global.com) and we will provide you with such information where you have a legitimate reason for requesting it (where we have shared your information with such service providers, for example)

**Legitimate interest relied on:** where we share your information with these third parties in a context other than where is necessary to perform a contract (or take steps at your request to do so), we will share your information with such third parties in order to allow us to run and manage our business efficiently.

**Legal basis for processing:** necessary to perform a contract and/or to take steps at your request prior to entering into a contract (Article 6(1)(b) of the General Data Protection Regulation).

# Privacy Policy

**Reason why necessary to perform a contract:** we may need to share information with our service providers to enable us to perform our obligations under that contract or to take the steps you have requested before we enter into a contract with you.

## **Disclosure of your information to other third parties**

We disclose your information to other third parties in specific circumstances, as set out below.

## **Providing information to third parties such as *Google Inc.***

We have not commissioned Google or any other third party to collect information on our website usage. However, third party companies such as Google may track and compile analytical information on your website search and your usage behaviour independently from us and without our knowledge. To find out more about what information Google collects, how it uses this information and how to control the information sent to Google, please see the following page: <https://www.google.com/policies/privacy/partners/>

**Legal basis for processing:** our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

**Legitimate interest(s):** meeting our contractual obligations to Google under our Google Analytics Terms of Service (<https://www.google.com/analytics/terms/us.html>)

You can opt out of Google Analytics by installing the browser plugin here: <https://tools.google.com/dlpage/gaoptout>

## **Transfer and storage of your information**

Information collected by Google Analytics is stored outside the UK and European Economic Area on Google's servers in the United States of America. For further information about the safeguards used when your information is transferred outside the UK and European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the UK and European Economic Area.

# Privacy Policy

## **Sharing your information with third parties, which are either related to or associated with the running of our business, where it is necessary for us to do so**

These third parties include our accountants, affiliates, agents, business partners, independent contractors and insurers *in personal data for managing your business*. Further information on each of these third parties is set out below.

**Legal basis for processing:** our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

**Legitimate interest:** running and managing our business efficiently.

### **Accountants**

We share information with our accountants for tax purposes. For example, we share invoices we issue and receive with our accountants for the purpose of completing tax returns and our end of year accounts.

Our accountants are located in *England*.

### **Advisors**

Occasionally, we obtain advice from advisors, such as accountants, financial advisors, lawyers and public relations professionals. We will share your information with these third parties only where it is necessary to enable these third parties to be able to provide us with the relevant advice.

Our advisors are located in England

### **Affiliates and Agents**

Affiliates are individuals or entities we work with to promote our business by various means, including by advertising our services on their websites for example. Our affiliates and agents are usually in the Telecommunications and Information Technology sector. Affiliates and agents will share information with us, and we will share information with them where you have expressed an interest in our products or services. Our affiliates are usually based in Telecommunications and Information Technology industry sector. To date, our affiliates and agents are located in UK, Europe, Australia and USA.

### **Business partners**

Business partners are businesses we work with which provide goods and services which are complementary to our own or which allow us to provide goods or services which we could not provide on our own. We share information with our business partners where you have requested services which they provide whether independently from, or in connection with or own services.

Our business partners are based in Telecommunications and Information Technology industry sector. Our Business Partners are located in UK, Europe, Australia and USA.

# Privacy Policy

## **Independent contractors**

Occasionally, we use independent contractors in our business. Your information will be shared with independent contractors only where it is necessary for them to perform the function, we have hired them perform in relation to our business. Our independent contractors are based in Telecommunications and Information Technology industry sector. Our Independent contractors are located in the UK, EU, Australia and USA.

## **Insurers**

We will share your information with our insurers where it is necessary to do so, for example in relation to a claim or potential claim we receive or make or under our general disclosure obligations under our insurance contract with them. Our insurers are located in the UK. We do not display the identities of all of the other third parties we may share information with by name for security and competitive reasons. If you would like further information about the identities of such third parties, however, please contact us directly via our contact form or by email [info@scb-global.com](mailto:info@scb-global.com) and we will provide you with such information where you have a legitimate reason for requesting it (where we have shared your information with such third parties for example).

**Sharing your information with a prospective or actual purchaser or seller in the context of a business or asset sale or acquisition by us, a merger or similar business combination event, whether actual or potential.**

**Legal basis for processing:** legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

**Legitimate interest(s):** sharing your information with a prospective purchaser, seller or similar person in order to allow such a transaction to take place.

## **Disclosure and use of your information for legal reasons**

**Indicating possible criminal acts or threats to public security to a competent authority**

If we suspect that criminal or potential criminal conduct has been occurred, we will in certain circumstances need to contact an appropriate authority, such as the police. This could be the case, for instance, if we suspect that a fraud or a cybercrime has been committed or if we receive threats or malicious communications towards us or third parties. We will generally only need to process your information for this purpose if you were involved or affected by such an incident in some way.

# Privacy Policy

**Legal basis for processing:** our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

**Legitimate interests:** preventing crime or suspected criminal activity (such as fraud).

## **In connection with the enforcement or potential enforcement our legal rights**

We will use your information in connection with the enforcement or potential enforcement of our legal rights, including, for example, sharing information with debt collection agencies if you do not pay amounts owed to us when you are contractually obliged to do so. Our legal rights may be contractual (where we have entered into a contract with you) or non-contractual (such as legal rights that we have under copyright law or tort law).

**Legal basis for processing:** our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

**Legitimate interest:** enforcing our legal rights and taking steps to enforce our legal rights.

## **In connection with a legal or potential legal dispute or proceedings**

We may need to use your information if we are involved in a dispute with you or a third party for example, either to resolve the dispute or as part of any mediation, arbitration or court resolution or similar process.

**Legal basis for processing:** our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

**Legitimate interest(s):** resolving disputes and potential disputes.

## **For ongoing compliance with laws, regulations and other legal requirements**

We will use and process your information in order to comply with legal obligations to which we are subject. For example, we may need to disclose your information pursuant to a court order or subpoena if we receive one.

**Legal basis for processing:** compliance with a legal obligation (Article 6(1)(c) of the General Data Protection Regulation).



# Privacy Policy

**Legal obligation(s):** legal obligations to disclose information which are part of the laws of England and Wales or if they have been integrated into the United Kingdom's legal framework (for example in the form of an international agreement which the United Kingdom has signed).

**Legitimate interest:** where the legal obligations are part of the laws of another country and have not been integrated into the United Kingdom's legal framework, we have a legitimate interest in complying with these obligations.

## How long we retain your information

This section sets out how long we retain your information. We have set out specific retention periods where possible. Where that has not been possible, we have set out the criteria we use to determine the retention period.

### Retention periods

**Server log information:** we retain information on our server logs for up to 12 months

**Order information:** when you place an order for goods and services, we retain that information for minimum of six years following the end of the financial year in which you place your order, in accordance with our legal obligation to keep records for tax purposes.

**Correspondence and enquiries:** when you make an enquiry or correspond with us for any reason, whether by email, phone or via our contact form, we will retain your information for as long as it takes to respond to and resolve your enquiry, after which point we will delete your information when we no longer need the information.

### Criteria for determining retention periods

In any other circumstances, we will retain your information for no longer than necessary, taking into account the following:

- the purpose(s) and use of your information both now and in the future (such as whether it is necessary to continue to store that information in order to continue to perform our obligations under a contract with you or to contact you in the future)
- whether we have any legal obligation to continue to process your information (such as any record-keeping obligations imposed by relevant law or regulation)
- whether we have any legal basis to continue to process your information (such as your consent)



# Privacy Policy

- any relevant agreed industry practices on how long information should be retained;
- how hard it is to ensure that the information can be kept up to date and accurate; and
- any relevant surrounding circumstances (such as the nature and status of our relationship with you).

## How we secure your information

We take appropriate technical and organisational measures to secure your information and to protect it against unauthorised or unlawful use and accidental loss or destruction, including:

- Only sharing and providing access to your information to the minimum extent necessary, subject to confidentiality restrictions where appropriate, and on an anonymised basis wherever possible;
- using secure servers to store your information;
- verifying the identity of any individual who requests access to information prior to granting them access to information;
- using Secure Sockets Layer (SSL) software to encrypt [any information you submit to us via any forms on our website and any payment transactions you make on or via our website
- only transferring your information via closed system or password protected data transfers

## Transmission of information to us by email

Transmission of information over the internet is not entirely secure, and if you submit any information to us over the internet (whether by email, via our website or any other means), you do so entirely at your own risk. We cannot be responsible for any costs, expenses, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of your decision to transmit information to us by such means.

## Transfers of your information outside the UK and European Economic Area

All of your information is stored in the UK and the following European Economic Area (EEA) countries [Germany, Netherlands]. Other than to comply with any legal obligations to which we are subject (compliance with a court order, for example), we do not intend to transfer your information outside the UK or EEA or to an international organisation. In the unlikely event that we are required to transfer your information outside the UK or EEA (or to an international organisation) for such a purpose, we will ensure appropriate safeguards and protections are in place.

# Privacy Policy

## Contact form

Information you provide on our contact form will be stored on our third-party email provider's servers which could be in the European Economic area or transferred outside. For further information please see the section of this privacy policy entitled Transfers of your information outside the UK and European Economic Area.

We use a third-party email provider to store emails you send us. Our third-party email provider is Microsoft. Their privacy policy is available here: [privacy.microsoft.com](https://privacy.microsoft.com)

Safeguard(s) used: Our third-party email provider has self-certified its compliance with the UK, EU-U.S Privacy Shield

## Email

Emails you send us will be stored on our third-party email provider's servers which could be in the UK and European Economic area or transferred outside. For further information please see the section of this privacy policy entitled Transfers of your information outside the UK and European Economic Area.

We use a third-party email provider to store emails you send us. Our third-party email provider is Google. Their privacy policy is available here: [privacy.microsoft.com](https://www.google.com/policies/privacy/)

## Google Analytics

Information collected by Google Analytics (your IP address and actions you take in relation to our website) is transferred outside the UK and the EEA and stored on Google's servers. You can access Google's privacy policy here: <https://www.google.com/policies/privacy/> [Country of storage: United States of America. This country is not subject to an adequacy decision by the European Commission.]

Safeguard(s) used: Google has self-certified its compliance with the UK, EU-U.S. Privacy Shield which is available here: <https://www.privacyshield.gov/welcome>. The EU-U.S. Privacy Shield is an approved certification mechanism under Article 42 of the General Data Protection Regulation, which is permitted under Article 46(2)(f) of the General Data Protection Regulation. You can access the European Commission decision on the adequacy of the EU-U.S. Privacy Shield here: [http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index\\_en.htm](http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm)

Safeguards used: You can access the PayPal privacy policy here for further details: [www.paypal.com/uk/webapps/mpp/ua/privacy](https://www.paypal.com/uk/webapps/mpp/ua/privacy)

# Privacy Policy

## Information outside the UK and EEA by payment processors such as PayPal

Information you submit to us by PayPal is transferred outside the UK and EEA and stored on their servers. You can access the PayPal privacy policy here: [www.paypal.com/uk/webapps/mpp/ua/privacy](https://www.paypal.com/uk/webapps/mpp/ua/privacy) Country of storage: *[Both EU and non EU country such as UK, USA]*. This country is not subject to an adequacy decision by the European Commission nor subject to any UK adequacy decision.

## Your rights in relation to your information

Subject to certain limitations on certain rights, you have the following rights in relation to your information, which you can exercise by writing to: SCB Global Ltd 37<sup>th</sup> Floor, One Canada Square, Canary Wharf, London E14 5AA or sending an email to [Info@scb-global.com](mailto:Info@scb-global.com):

- to request access to your information and information related to our use and processing of your information;
- to request the correction or deletion of your information;
- to request that we restrict our use of your information;
- to receive information which you have provided to us in a structured, commonly used and machine-readable format (e.g. a CSV file) and the right to have that information transferred to another data controller (including a third party data controller);
- **to object to the processing of your information for certain purposes** (for further information, see the section below entitled Your right to object to the processing of your information for certain purposes); and
- **to withdraw your consent to our use of your information** at any time where we rely on your consent to use or process that information. Please note that if you withdraw your consent, this will not affect the lawfulness of our use and processing of your information on the basis of your consent before the point in time when you withdraw your consent.

In accordance with Article 77 of the General Data Protection Regulation, you also have the right to lodge a complaint with a supervisory authority, in particular within the UK or any Member State of your habitual residence, place of work or of an alleged infringement of the General Data Protection Regulation.

For the purposes of the UK, the supervisory authority is the Information Commissioner's Office (ICO), the contact details of which are available here: <https://ico.org.uk/global/contact-us/>

# Privacy Policy

## **Further information on your rights in relation to your personal data as an individual**

The above rights are provided in summary form only and certain limitations apply to many of these rights. For further information about your rights in relation to your information, including any limitations which apply, please visit the following pages on the ICO's website:

- <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>; and
- <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>
- 

You can also find out further information about your rights, as well as information on any limitations which apply to those rights, by reading the underlying legislation contained in Articles 12 to 22 and 34 of the General Data Protection Regulation, which is available here: [http://ec.europa.eu/justice/data-protection/reform/files/regulation\\_oj\\_en.pdf](http://ec.europa.eu/justice/data-protection/reform/files/regulation_oj_en.pdf)

## **Verifying your identity where you request access to your information**

Where you request access to your information, we are required by law to use all reasonable measures to verify your identity before doing so. These measures are designed to protect your information and to reduce the risk of identity fraud, identity theft or general unauthorised access to your information.

## **How we verify your identity**

Where we possess appropriate information about you on file, we will attempt to verify your identity using that information.

If it is not possible to identify you from such information, or if we have insufficient information about you, we may require original or certified copies of certain documentation in order to be able to verify your identity before we are able to provide you with access to your information.

We will be able to confirm the precise information we require to verify your identity in your specific circumstances if and when you make such a request.

## **Your right to object to the processing of your information for certain purposes**

You have the following rights in relation to your information, which you may exercise in the same way by writing to: SCB Global Ltd 37<sup>th</sup> Floor, One Canada Square, Canary Wharf, London E14 5AA or sending an email to [Info@scb-global.com](mailto:Info@scb-global.com):

# Privacy Policy

- to object to us using or processing your information where we use or process it in order to carry out a task in the public interest or for our legitimate interests, including 'profiling' (i.e. analysing or predicting your behaviour based on your information) based on any of these purposes; and
- to object to us using or processing your information for direct marketing purposes (including any profiling we engage in that is related to such direct marketing).
- You may also exercise your right to object to us using or processing your information for direct marketing purposes by:
- clicking the unsubscribe link contained at the bottom of any marketing email we send to you and following the instructions which appear in your browser following your clicking on that link;
- Sending an email to [Info@scb-global.com](mailto:Info@scb-global.com), asking that we stop sending you marketing communications or by including the words "OPT OUT".

## Sensitive Personal Information

'Sensitive personal information' is information about an individual that reveals their racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic information, biometric information for the purpose of uniquely identifying an individual, information concerning health or information concerning a natural person's sex life or sexual orientation.

We do not knowingly or intentionally collect sensitive personal information from individuals, and you must not submit sensitive personal information to us.

If, however, you inadvertently or intentionally transmit sensitive personal information to us, you will be considered to have explicitly consented to us processing that sensitive personal information under Article 9(2)(a) of the General Data Protection Regulation. We will use and process your sensitive personal information for the purposes of deleting it.

## Changes to our Privacy Policy

### Minor changes to our Privacy Policy

Where we make minor changes to our Privacy Policy, we will update our Privacy Policy with a new effective date stated at the beginning of it. Our processing of your information will be governed by the practices set out in that new version of the Privacy Policy from its effective date onwards.

# Privacy Policy

## **Major changes to our Privacy Policy or the purposes for which we process your information**

Where we make major changes to our Privacy Policy or intend to use your information for a new purpose or a different purpose than the purposes for which we originally collected it, we will notify you by email (where possible) or by posting a notice on our website.

We will provide you with the information about the change in question and the purpose and any other relevant information before we use your information for that new purpose.

Wherever required, we will obtain your prior consent before using your information for a purpose that is different from the purposes for which we originally collected it.

## **Children's Privacy**

Because we care about the safety and privacy of children online, we comply with the Children's Online Privacy Protection Act of 1998 (COPPA). COPPA and its accompanying regulations protect the privacy of children using the internet. We do not knowingly contact or collect information from persons under the age of 18. The website is not intended to solicit information of any kind from persons under the age of 18.

It is possible that we could receive information pertaining to persons under the age of 18 by the fraud or deception of a third party. If we are notified of this, as soon as we verify the information, we will, where required by law to do so, immediately obtain the appropriate parental consent to use that information or, if we are unable to obtain such parental consent, we will delete the information from our servers. If you would like to notify us of our receipt of information about persons under the age of 18, please do so by sending an email to [Info@scb-global.com](mailto:Info@scb-global.com).

## **California Do Not Track Disclosures**

"Do Not Track" is a privacy preference that users can set in their web browsers. When a user turns on a Do Not Track signal in their browser, the browser sends a message to websites requesting that they do not track the user. For information about Do Not Track, please visit [www.allaboutdnt.org](http://www.allaboutdnt.org). At this time, we do not respond to Do Not Track browser settings or signals.

# Privacy Policy

## Copyright, credit and logo

This Privacy Policy is based on a General Data Protection Regulation (Regulation (EU) 2016/769) (GDPR) compliant template provided by GDPR Privacy Policy. For further information, please visit <https://gdprprivacypolicy.org>. The copyright in this Privacy Policy is either owned by, or licensed to, us and is protected by copyright laws around the world and copyright protection software. All intellectual property rights in this document are reserved. Where we display the GDPR Privacy Policy logo on our website,

