

# CONVERSAFE – Website Privacy Policy

Welcome to the ConverSafe website privacy policy.

ConverSafe LLP, is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you when you use our website, in accordance with the UK General Data Protection Regulation (UK GDPR) in the UK and the General Data Protection Regulation (GDPR) in the EU.

## **1 Important information and who we are**

### *Purpose of this privacy policy*

This privacy policy aims to give you information on how ConverSafe collects and processes your personal data through your use of this website.

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

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

### *Controller*

This privacy policy is issued on behalf of ConverSafe LLP so when we mention "ConverSafe", "we", "us", "our" or "Partnership" in this privacy policy, we are referring to the relevant company or business in ConverSafe responsible for processing your data. ConverSafe is the controller and responsible for this website.

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out below.

### *Contact details*

If you have any questions about this privacy policy or our privacy practices, please contact us in the following ways:

Full name of legal entity: Conversafe LLP

Email address: [contact@conversafe.pro](mailto:contact@conversafe.pro)

Postal addresses: c/o Business Control, Red Lion Yard, Frome Road, BATH BA2 2PP, UK

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)) or the relevant regulator in Europe. We would, however, appreciate the chance to deal with your concerns before you approach any regulator so please contact us in the first instance.

### *Changes to the privacy policy and your duty to inform us of changes*

We keep our privacy policy under regular review. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### *Third-party links*

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## **2 The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our website.

We may also collect and use Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### *If you fail to provide personal data*

If you fail to provide personal data (by changing the cookie settings), you will nevertheless be able to use our website freely.

## **3 How is your personal data collected?**

We may use automated technologies or interactions to collect technical data about you. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.

We may obtain Technical Data from analytics providers such as Google based outside the UK.

### *How we use your personal data*

We will only use your personal data when the law allows us to. We will use your personal data where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

### *Purposes for which we will use your personal data*

To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Technical	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 restructuring exercise).
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	Technical	Necessary for our legitimate interests (to study how customers use our products/services, to 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	Technical	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)

### *Marketing*

We do not use your personal data for marketing purposes.

### *Cookies*

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. This will not affect your use of our website.

The only cookies we use on our website are those associated with Google Analytics. You can find out more about these cookies here: <https://privacy.google.com>. A Google Analytics opt-out extension for your browser is available here: <https://tools.google.com/dlpage/gaoptout>.

### *Change of purpose*

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

#### **4 Disclosures of your personal data**

We may share your personal data with our providers of server and analytics services for the purposes set out in the table above.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

#### **5 International transfers**

We share your personal data within the ConverSafe Partnership but this does not involve transferring your data outside the UK and EU.

Whenever we transfer your personal data out of the UK and EU, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Currently, any data transferred outside the UK and EU will be anonymised before it is sent.

#### **6 Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

#### **7 Data retention**

*How long will you use my personal data for?*

We will in general retain your personal data only for the time necessary for it to be analysed and a reported upon.

Our analytics provider (Google) will retain the data in anonymised form for up to 24 months.

In some circumstances you can ask us to delete your data: see "Your Legal Rights" below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## 8 Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please email us at [contact@conversafe.pro](mailto:contact@conversafe.pro)

*No fee usually required*

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

*What we may need from you*

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

*Time limit to respond*

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.