

PRIVACY & COOKIE POLICY

1. Purpose of this privacy policy

StarTraq Ltd is committed to protecting the privacy and security of your personal information.

This privacy policy describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the UK General Data Protection Regulation (UK GDPR). It applies to all clients, employees, suppliers, partners and prospects of StarTraq Ltd.

StarTraq Limited is a "data controller". This means we are responsible for deciding how we hold and use your personal information. We are required under data protection legislation to notify you of the information contained in this privacy policy.

It is essential that you read this policy and any other privacy policy we may provide on specific occasions when we are collecting or processing personal information about you so that you are aware of how and why we are using such information.

2. Data protection principles

We will comply with data protection law, meaning that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
3. Relevant to the purposes we have told you about and limited only to those purposes
4. Accurate and kept up to date
5. Kept only as long as is necessary for the purposes we have told you about
6. Kept securely

3. The information we hold about you

Personal data can be 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).

There are "special categories" of more sensitive personal data which require a higher level of protection.

Although StarTraq only processes minimal 'special category' data, they understand the need to identify both a lawful basis for processing AND one of the following additional conditions for processing special category data :

- ✓ Explicit consent from the data subject
- ✓ To carry out specific obligations and rights in the field of employment and social protection law
- ✓ To protect the vital interests of an individual who is incapable of giving consent
- ✓ The personal data has been manifestly made public by the data subject
- ✓ To support legal claims or courts acting in their judicial capacity
- ✓ For reasons of substantial public interest

- ✓ For medical assessment and treatment purposes
- ✓ For reasons of public interest regarding public health

Unless both a legal basis for processing AND one of the above conditions are identified, processing of 'special category' data is prohibited.

4. How we collect your personal information

Generally, information would be collected soon after signing a contract to provide services or through marketing channels where there is a legitimate interest or consent has been given. Data is then kept up to date at certain intervals.

We would contact a client soon after signing a new contract to provide services and rarely later in the business relationship. Personal data would thereafter be collected directly and specifically required to fulfil our obligations under the contract.

We also collect personal information for direct marketing purposes. This information is sourced from various sources, including purchasing distribution lists, directly via customer orders, social media, website enquiries, trade shows, and conferences.

5. How will we use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you
2. Where we need to comply with a legal obligation
3. 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
4. Various direct marketing activities, i.e. electronic mailing campaigns

6. The situations in which we will use your personal information

We need all the categories of information in the list above (see 'The information we hold about you') primarily to allow us to perform our contract with you and to enable us to comply with legal obligations.

The situations in which we will process your personal information are:

- To enable services detailed in the contract with you to be delivered
- Administering the contract, we have entered into with you
- Business management and planning activities
- Liaising with selected third parties on your behalf
- Making arrangements for the termination of our working relationship
- Direct marketing related to relevant products and services

7. If you fail to provide personal information when requested by us

Suppose you fail to provide certain information when requested. In that case, we may be unable to fulfil any contract we have entered into with you or be prevented from complying with our legal obligations.

8. Change of Purpose

We will only use your personal information for the purposes for which it was collected unless we reasonably consider that we need to use it for another reason, and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

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

9. Do we need your consent?

Consent is not required when we process personal data to comply with contractual obligations. As processing is necessary for a contract with an individual, the processing is lawful on this basis, and we do not need separate written consent. Please also refer to the following section on 'lawful basis'.

10. The lawful basis for processing data

StarTraq must always have a justifiable legal basis for processing each type of personal data it handles. At least one of the 6 lawful bases will apply whenever StarTraq processes personal data.

- **Consent**
The data subject has given informed consent to processing their personal data for one or more specific purposes.
- **Contract**
Processing is necessary for the performance of a contract to which the data subject is party or to take steps at the data subject's request before entering into a contract.
- **Legal obligation**
The processing is necessary for StarTraq to comply with the law (not including contractual obligations)
- **Vital interests**
Processing is necessary to protect the vital interests of the data subject or of another person (for example, to protect someone's life)
- **Public task**
Processing is necessary for StarTraq to perform a task carried out in the public interest or for the exercise of official authority
- **Legitimate interests**
Processing is necessary for the purposes of the legitimate interests pursued by StarTraq or a third party, unless overridden by a need to protect the rights of the data subject (in particular, where the data subject is a child).

11. Sharing your data with third parties

We may have to share your data with third parties, including third-party service providers. Generally, StarTraq Ltd will only share your data with a third party where it is necessary to fulfil our contractual obligations with you.

We require third parties to respect the security of your data and treat it according to the law. All third parties we deal with must take appropriate steps to protect your personal data. Third parties are only

permitted to process data for the specified purpose and not to use data provided to them for any other purpose.

12. Security of personal data

StarTraq Ltd takes the security of all data seriously, and we have put in place specific security measures to ensure personal information is kept secure. All information systems have appropriate security measures, and access is limited to only those requiring it. StarTraq Ltd uses encryption and the use of secure data transfer systems to transmit any data outside of the company. Third-party systems are all required to be GDPR compliant, which includes the requirement to ensure all data is secure.

Appropriate security measures are in place to ensure your personal data is not accessed in an unauthorised manner, lost, stolen or accidentally disclosed to an unauthorised third party.

In the event of a suspected data security breach, there are processes in place to notify you and the Information Commissioner's Office of the event.

13. Retention of data

StarTraq Limited's data retention policy is driven by requirements which stipulate retention periods for retaining data. StarTraq Ltd will only retain your personal data for as long as necessary to comply with retention periods.

14. Your rights concerning the personal data we hold

In line with StarTraq's fundamental principle of giving back control of personal data to the individual, they will uphold the following rights of a data subject:

- ✓ **Right to be informed**
StarTraq has an obligation to provide fair and transparent information on how personal data is processed, typically through a privacy notice.
- ✓ **Right of access**
StarTraq allows data subjects to access their personal data.
- ✓ **Right to rectification**
StarTraq will amend personal data if the data subject reports that it is inaccurate or incomplete.
- ✓ **Right to erasure (or 'be forgotten')**
StarTraq will fulfil an individual's request for deletion or removal of personal data where there is no compelling reason for its continued processing.
- ✓ **Right to restrict processing**
StarTraq will 'block' or suppress the processing of an individual's personal data upon request where there is no compelling reason for its continued processing.
- ✓ **Right to data portability**
Upon request, StarTraq will consider any request to provide a secure method of moving, copying or transferring useable personal data to another IT environment.
- ✓ **Right to object**

Unless there is a compelling legitimate reason for continuing to process data, StarTraq will stop processing personal data where an individual has raised an objection.

✓ **Rights in relation to automated decision-making and profiling**

StarTraq will only carry out this type of decision-making when the decision is necessary for entering or performing a contract, when StarTraq has legal authorisation, or when StarTraq has obtained the individual's explicit consent.

15. Data Protection Lead

We have appointed a Data Protection Lead (DPL) to oversee compliance with this privacy policy. If you have any questions about this privacy policy or how we handle your personal information, please contact the DPL at:

Data Protection Lead
StarTraq Limited
StarTraq House
Banbury Office Village
Noral Way
Banbury
OXON
OX16 2SB

If you want to complain about how we have processed your personal information, you can contact us at the above address.

StarTraq Ltd is registered with the ICO as a controller and processor of personal information.

16. Updates to this privacy policy

We reserve the right to update this privacy policy at any time, and we will provide you with a revised privacy policy when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

17. Use of cookies

In order to improve our website, we may use small files commonly known as "cookies". A cookie is a small amount of data, often including a unique identifier, sent to your computer or mobile phone from our website and stored on your device's hard drive. A cookie also records information on your device relating to your internet activity (such as whether you have visited our website before).

If you do not want us to use cookies when you use our website, you can adjust your internet browser settings not to accept cookies. Your web browser's help function should tell you how to do this.

Alternatively, you can find information about how to do this for all the commonly used internet browsers at <http://www.aboutcookies.org/default.aspx>. This website will also explain how to delete cookies already stored on your device. You acknowledge that if your computer is set to reject cookies, you may still use our website, but your ability to use some of the areas of our website may be limited.

The table below explains the cookies we use and why:

Cookie	Name	Purpose
Necessary Cookies	CookieControl	This cookie is set by the Civic UK Cookie Control and is used to remember a user's choice of cookies on www.startraq.com.
Necessary Cookies	__cf_bm (Vimeo.com)	The __cf_bm cookie is a cookie necessary to support Cloudflare Bot Management, currently in private beta. As part of our bot management service, this cookie helps manage incoming traffic that matches criteria associated with bots.
Necessary Cookies	JSESSIONID (nr-data.net)	This is a general purpose session cookie used by websites written in JSP. Usually used to maintain an anonymous user session by the server.
Functional	vuid	This is a cookie from Vimeo used for the video player on our website.
Functional	aiovg_rand_seed	This cookie is used by All-in-One Viewing Gallery plugin that displays videos.
Analytics	_gcl_au	Google Tag Manager sets the cookie to experiment advertisement efficiency of websites using their services.
Analytics	_ga	Google Analytics sets this cookie to calculate visitor, session and campaign data and track site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognise unique visitors.
Analytics	_ga_*	Google Analytics sets this cookie to store and count page views.
Analytics	_gid	Google Analytics sets this cookie to store information on how visitors use a website while also creating an analytics report of the website's performance. Some of the collected data includes the number of visitors, their source, and the pages they visit anonymously.
Analytics	_gat_gtag_UA_*	Google Analytics sets this cookie to store a unique user ID.

Google Analytics

We use Google Analytics, a web analytics service provided by Google Inc., to understand how visitors use our website. The Google Analytics cookies collect information about how people use our website, for example, which pages are visited the most often, how people are moving from one link to another and if they get error messages from certain pages. The cookies do not gather any information that identifies you. The information these cookies collect is grouped together with information from other people's use of our website anonymously. Overall, these cookies provide us with analytical information about how our website performs and how we can improve our website. You can opt out of Google Analytics without affecting your use of our website – for more information on how to opt out of being tracked by Google Analytics across all websites you use, visit <https://tools.google.com/dlpage/gaoptout>.

18. Search engine

Search queries and results are logged anonymously to help us improve our website and search functionality. No user-specific data is collected by either StarTraq or any third party.

19. Email campaigns

We use our Customer Relationship Management system to deliver our email campaigns. Using industry-standard technologies to help us monitor and improve our email campaigns, we gather statistics around email openings and clicks.

20. Online demo request forms

We collect information volunteered by potential customers via our website. This data is then sent directly to us via email. This information is then stored in our Customer Relationship Management system; it is not shared with any third party.

21. People who contact us via social media

If you send us a private or direct message via social media, the message will be stored on that social media platform. We may save a copy of that message against our Customer Relationship Management software if it is applicable to do so. It will not be shared with any other organisations.

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