



## Privacy Notice

This is the privacy notice of CaliQ Software Ltd. Throughout this document, "we", "our", or "us" refers to CaliQ Software Ltd.

We are company number 02733363 registered in England and Wales. Our registered office is at CaliQ Software Ltd, The Grange, Woodhurst, Huntingdon, PE28 3BQ, United Kingdom.

Our e-mail address for requests is [privacy@caliq.com](mailto:privacy@caliq.com).

### Introduction

1. This is a notice to inform you of our policy about all information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information.
2. We take seriously the protection of your privacy and confidentiality. We understand that all visitors to our website are entitled to know that their personal data will not be used for any purpose unintended by them and will not accidentally fall into the hands of a third party.
3. We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate. We agree to hold your data fairly, lawfully and transparently.
4. Our policy complies with UK law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR).
5. The law requires us to tell you about your rights and our obligations to you in regards to the processing and control of your personal data. We do this now, by requesting that you read the information provided at [www.knowyourprivacyrights.org](http://www.knowyourprivacyrights.org).
6. Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.
7. We regret that if there are one or more points below with which you are not happy, your only recourse is to leave our website and end usage of our products immediately.

## The bases on which we process information about you

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant then we shall immediately stop processing your data.

If the basis changes then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

### **1. Information we process because we have a contractual obligation with you**

When you buy a product or service from us, or otherwise agree to our terms and conditions, a contract is formed between you and us.

In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information.

We may use it in order to:

- 1.1. verify your identity for security purposes
- 1.2. sell products or services to you
- 1.3. provide you with our services
- 1.4. provide you with suggestions and advice on products, services and how to obtain the most from using our website

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

Additionally, we may aggregate this information in a general way and use it to provide class information, for example to monitor our performance with respect to a particular service we provide. If we use it for this purpose, you as an individual will not be personally identifiable.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

## **2. Information we process with your consent**

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business or our products and services, you provide your consent to us to process information that may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies.

Sometimes you might give your consent implicitly, such as when you send us a message by e-mail to which you would reasonably expect us to reply.

Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information, for example to monitor the performance of a particular page on our website.

If you have given us explicit permission to do so, we may from time to time pass your name and contact information to selected associates whom we consider may provide services or products you would find useful.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us by writing to [privacy@caliq.com](mailto:privacy@caliq.com). However, if you do so, you may not be able to use our website or our services further.

## **3. Information we process because we have a legal obligation**

We are subject to the law like everyone else. Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

This may include your personal information.

## Specific uses of information you provide to us

### **4. Information provided on the understanding that it will be shared with a third party**

Our website allows you to submit information with a view to that information being read, copied, downloaded, or used by other people.

Examples include:

- 4.1. posting a testimonial on our website.
- 4.2 providing or consenting to a news item posted on our website.

In posting personal information, it is up to you to satisfy yourself about the privacy level of every person who might use it.

We do not specifically use this information except to allow it to be displayed or shared.

We do store it, and we reserve a right to use it in the future in any way we decide.

Once your information enters the public domain, we have no control over what any individual third party may do with it. We accept no responsibility for their actions at any time.

Provided your request is reasonable and there is no legal basis for us to retain it, then at our discretion we may agree to your request to delete personal information that you have posted. You can make a request by contacting us at [privacy@caliq.com](mailto:privacy@caliq.com).

### **5. Complaints regarding content on our website**

If you complain about any of the content on our website, we shall investigate your complaint. If we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate.

Free speech is a fundamental right, so we have to make a judgment as to whose right will be obstructed: yours, or that of the person who posted the content that offends you.

If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.

## **6. Information relating to your method of payment**

Payment information is never taken by us or transferred to us either through our website or otherwise. Our employees and contractors never have access to it.

If paying electronically, your payment will be received into a bank account provided by a reputable financial institution chosen by Caliq Software Ltd.

## **7. Job application and employment**

If you send us information in connection with a job application, we may keep it for up to 3 years in case we decide to contact you at a later date.

If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for 3 years before destroying or deleting it.

## **8. Sending a message to our support team**

When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our customer service.

We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high-quality service.

## **9. Complaints**

When we receive a complaint, we record all the information you have given to us.

We use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

## **10. Affiliate and business partner information**

This is information given to us by you in your capacity as a business partner.

It allows us to receive business and personal data related to prospective clients that you have referred to us.

The information is not used for any other purpose.

We undertake to preserve the confidentiality of the information and of the terms of our relationship.

We expect any partner to agree to reciprocate this policy.

# Use of information we collect through automated systems when you visit our website

## 11. Cookies

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience and the website owner with statistics about how you use the website so that it can be improved.

Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely.

Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.

Our website uses cookies. They are placed by software that operates on our servers, and by software operated by third parties whose services we use.

When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose.

We use cookies in the following ways:

- 11.1. to track how you use our website
- 11.2. to record whether you have seen specific messages we display on our website
- 11.3. to protect the security of our site, to determine the difference between human visits and automated malicious attacks on our website
- 11.4. to provide you as a user certain functionality on our website

### IP Address and traffic data

We keep a record of traffic data which is logged automatically by our servers, such as your Internet Protocol (IP) address and device information. We also collect some site, application and service statistics such as access rates, page hits and page views. We are not able to identify any individual from traffic data or site statistics.

## **12. Personal identifiers from your browsing activity**

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

## **13. Our use of re-marketing**

Re-marketing involves placing a cookie on your computer when you browse our website in order to be able to serve to you an advert for our products or services when you visit some other website.

We may use a third party to provide us with re-marketing services from time to time. If so, then if you have consented to our use of cookies, you may see advertisements for our products and services on other websites.

## **Disclosure and sharing of your information**

### **14. Information we obtain from third parties**

Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive data that is indirectly made up from your personal information from third parties whose services we use.

No such information is personally identifiable to you.



Examples include:

14.1 Google Analytics collecting statistical information of visitors of our website – examples of data collected where available - your devices operating system, browser name, screen size, device type, country of ISP origin and webpages viewed.

14.2 Wordfence Security collecting statistical information of visitors of our website, to determine the difference between valid human website interaction and malicious automated website attacks.

## **15. Third party advertising on our website**

We do not directly advertise third party companies on our website.

## **16. Credit reference**

To assist in combating fraud, we may share information with credit reference agencies, so far as it relates to clients or customers who instruct their payment issuer to cancel payment to us without having first provided an acceptable reason to us and given us the opportunity to refund their money.

## **17. Data may be processed outside the European Union**

Our website is hosted in the United Kingdom.

We may also use outsourced services in countries outside of the European Union from time to time in other aspects of our business.

Accordingly, data obtained within the UK or any other country could be processed outside the European Union.

For example, some of the software our website uses may have been developed in the United States of America or in Australia.

## Access to your own information

### 18. Access to your personal information

- 18.1. At any time, you may review or update personally identifiable information that we hold about you, by sending us a request at [privacy@caliq.com](mailto:privacy@caliq.com).
- 18.2. To obtain a copy of any information you may send us a request at [privacy@caliq.com](mailto:privacy@caliq.com).
- 18.3. We will provide a copy of the information free of charge within 30 days of receipt of request. However, we maintain the right to charge a 'reasonable fee' when a request is manifestly unfounded or excessive, particularly if it is repetitive. We may also charge a reasonable fee to comply with requests for further copies of the same information. This does not mean that we will charge for all subsequent access requests. The fee will be based on the administrative cost of providing the information.

### 19. Removal of your information

If you wish us to remove personally identifiable information from our records, you may contact us at [privacy@caliq.com](mailto:privacy@caliq.com). This may limit the service we can provide to you as a result.

We will seek to remove your personally identifiable information from our live systems within 30 days of your request.

Due to the physical constraints of computer backup processes, your data may still be retained for a period of up to 180 days in the form of archived software backups, although not directly accessible by staff members. Once this period has passed, any archived data will be overwritten and your details will no longer be stored in backup archives.

### 20. Verification of your information

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

## Other matters

### 21. Encryption of data sent between us

At a high level, encryption is the process of encoding data (referred to as plaintext) into ciphertext that cannot be used by people or computers unless and until the ciphertext is decrypted. Decryption requires an encryption key that only authorized users have. Encryption helps ensure that only authorized recipients can decrypt content, such as email messages and files.

Whenever information is transferred to us from our website, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

If we share files directly to you or request files directly from you via Microsoft Office365, either from Microsoft OneDrive for Business or Microsoft SharePoint Online, these files in rest or in transit are protected using the most advanced method of data encryption available. For data at rest, two types of encryption are used; disk encryption and file encryption. At disk level, BitLocker is used and ensures data is unreadable should a drive be removed from its server storage. At file level, each file is encrypted with its own unique key, additionally each file update is encrypted with its own unique encryption key. All encryption conforms to AES with 256-bit keys and is FIPS 140-2 compliant. For files larger than 64kb, the file is split into parts and each part is provided with its own encryption key. Each part is then randomly stored over numerous Microsoft Azure Storage Containers, each with their own security credentials. Transport Layer Security (TLS) is utilised for files in transit sent between users.

If we share files directly to you or request files directly from you via Dropbox, these files in rest or in transit are protected using the most advanced method of data encryption available. Encryption conforms to AES with 256-bit keys. To protect data in transit between Dropbox apps (currently desktop, mobile, API, or web) and our servers, Dropbox uses Secure Sockets Layer (SSL)/Transport Layer Security (TLS) for data transfer, creating a secure tunnel protected by 128-bit or higher Advanced Encryption Standard (AES) encryption.

If we share files or any form of communication with you via e-mail utilising Microsoft Exchange Online, messages are automatically encrypted utilising Transport Layer Security (TLS) to encrypt the connection, or session, between two servers. The message remains in ciphertext while it's in transit in order to protect it from being read in case the message is intercepted. Once the message is received by the recipient, the message is transformed back into readable plain text.

## 22. How you can complain

- 23.1. If you are not happy with our privacy policy or if you have any complaint then you should tell us by email, telephone or by writing to us. Our e-mail address is to address your complaint is [service@caliq.com](mailto:service@caliq.com). If complaining in written letter, please address to our registered office is at The Grange, Woodhurst, Huntingdon, PE28 3BQ, United Kingdom.
- 23.2. You can find further information about our complaint handling procedure by requesting a copy of our Caliq Complaints Procedure, either by e-mail, telephone or in writing. Large Print copies of our Complaints Procedure are also available upon request.
- 23.3. If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.
- 23.4. If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office. This can be done at <https://ico.org.uk/concerns/>

## 23. Retention period for personal data

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- 24.1. to provide you with the services you have requested;
- 24.2. to comply with other law, including for the period demanded by our tax authorities;
- 24.3. for a period of 6 years in direct relation to any request made by you for the removal of your personal details from our systems, as proof of record.
- 24.4. to support a claim or defence in court.

## 24. Compliance with the law

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we would like to hear from you.

However, ultimately it is your choice as to whether you wish to use our website, products and services.

## **25. Review of this privacy policy**

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please contact us at [privacy@caliq.com](mailto:privacy@caliq.com).