

Privacy Notice –

Digital-resilience.com Website

Date 18/07/2018

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1 Introduction

Digital-resilience.com is a website owned by Shearwater Group plc (SWG). SWG is committed to safeguarding the privacy of personal and sensitive personal data and is bound to comply with the EU General Data Protection Regulation (GDPR), along with similar and applicable laws in other countries around the world. This Privacy Notice forms part of SWG's obligation to be open and fair with all individuals whose personal and sensitive personal data we process while visiting the digital-resilience.com website and to provide details around how it processes such personal data and what it does with it.

Shearwater Group plc (SWG) is a member of the Alternative Investment Market. Company Number 05059457. Incorporated on 01/03/2004, registered address 22 Great James Street, London, WC1N 3ES.

2 What personal data do we process?

We will only process the minimum amount of data needed for the purposes outlined in section 3.

- For website visitors, when you visit our website, there is certain information that we may automatically collect, whether you decide to use our services or not. This includes your IP address, the date and the times and frequency with which you access the website and the way you browse its content, for more details about information captured via cookies refer to our cookie policy below.
- For subscribers to our marketing communication, we only process your name and email address.

We only collect data directly from you when you provide us with information by filling in forms on our Website.

3 Why do we process your personal data?

We may use your personal information to:

- to provide you with information about other services we offer that are similar to those that you have already purchased or enquired about;
- to keep you updated with new content added to our website;
- to ensure that content from our Website is presented in the most effective manner for you and for your computer;

We have identified our legal basis for processing your data to be the following:

- **Legitimate Interest** where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests. Our legitimate interests include direct marketing purposes, identifying sales opportunities and promoting our relevant services and solutions
- **Consent** to receive marketing communication by subscribing to our newsletter and mailing list.

4 Who do we share your data with

We only disclose your personal data in the ways set out in this Privacy Notice or subject to any agreements in place between us. The following circumstances may apply:

- Across the SWG lines of business, as part of a need to know or as part of improving our existing solutions and services or as part of providing new solutions and services. These lines of business consist of the following legal entities, all registered at 22 Great James Street, London, England, WC1N 3ES
 - a. Xcina limited, company number 10835789
 - b. Xcina Consulting limited, company number 1085775
 - c. Geolang limited, company number 05719222
 - d. SecurEnvoy limited, company number 04866711
- To third parties who process personal data on our behalf, such as systems providers.

We do not sell, rent or trade any of your personal data. We will get your express opt-in consent before we share your personal data with any company outside the SWG group of companies for marketing purposes.

5 Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

6 How do we protect your data

Where SWG acts as the controller of personal data, we will ensure that necessary and adequate safeguards are in place to prevent unauthorised access, loss, misuse or alteration of your personal data.

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 also carry out regular security testing to ensure that your personal data is protected.

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 International data transfers

We do not transfer your personal data outside the European Economic Area (EEA)

8 Your legal rights

Unless subject to an exemption under the data protection laws, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), where applicable (i.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to our processing of personal data, where applicable i.e. where processing is based on our legitimate interests (or in performance of a task in the public interest/exercise of official authority); direct marketing or processing for the purposes of scientific/historical research and statistics).

If you wish to exercise any of the rights set out above, please contact us as described below (section 10).

No fee required – with some exceptions

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 admin fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may 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 may 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.

9 Updates to this policy

In order to remain compliant with any legal and regulatory obligations, or as part of our evolving business practices, we may update this Privacy Notice from time to time by publishing a new version. In certain instances, we may notify you.

10 How to get in touch

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance contact us via: -

Email: dpo@theshearwatergroup.co.uk

Telephone: +44 (0)20 382 325 05

In Writing: Data Protection Officer
Shearwater Group plc
Octagon Point, St Pauls
5 Cheapside, London
EC2V 6AA

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the data protection regulator; the Information Commissions Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England, UK.

11 Website use of cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.