



QREDO.COM

MAY 2022

# PRIVACY POLICY

Effective Date: December, 2021

Qredo Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, qredo.com ("Our Site"), our App and tools made available through the Qredo\_Network ("Our Services") and our API ("Our Software"), collectively ("Our Products") and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under Data Protection Legislation (defined below).

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is deemed to occur upon your first use of our Site, Services or Software. If you do not accept and agree with this Privacy Policy, you must stop using our Products immediately.

## 1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

"Account"

Means an account required to access and/or use certain areas and features of our Products;

"Cookie"

Means a small text file placed on your computer or device by our Site when you visit certain parts of our Site and/or when you use certain features of our Site. Details of the Cookies used by our Site are set out below; and

"Cookie Law"

Means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003.

## 2. Information About Us

124 City Road  
London  
EC1V 2NX

[LINKEDIN.COM/COMPANY/9308747](https://www.linkedin.com/company/9308747)  
[TWITTER.COM/QREDONETWORK](https://twitter.com/QREDONETWORK)

Our Products are owned and operated by Qredo Ltd, a cybersecurity business, limited company registered in England under company number 7834052.

### 3. What Does This Policy Cover?

This Privacy Policy applies only to your use of our Products and may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

### 4. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

In registering for and using Our Products, you may provide certain information to us, such as your name, phone number, email address, home address, business address, job title and financial information. We may also collect demographic information such as your preferences and interests – this enables us to show you relevant content through your use of Our Products.

### 5. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- (a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us using the methods below to find out more or to ask any questions.
- (b) The right to access the personal data we hold about you. See: How Can I Access My Personal Data? to do this.
- (c) The right to rectification. This right enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- (d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object

to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law.

- (e) The right to restrict (i.e. prevent) the processing of your personal data. This enables you to ask us to suspend the processing of your personal data:
- If you want us to establish the data's accuracy.
  - Where our use of the data is unlawful but you do not want us to erase it.
  - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
  - If you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- (f) The right to object to us using your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- (g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- (h) h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- (i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For further information on each of those rights, including the circumstances in which they apply, please contact us, or see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.

To exercise your rights, please contact us.

## 6. Links to Third-Party Websites

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the methods below.

It is important that your personal data is kept accurate and up-to-date.

If any of the personal data we hold about you changes, please keep us informed if we have that data.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the methods below.

## 7. What Data Do You Collect and How?

Depending upon your use of our Products, we may collect and hold some or all of the personal data known to us.

## 8. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data.

You will not be sent any unlawful marketing or spam. we will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the methods below.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

## 9. Why Do You Use My Personal Data?

We may use your personal data for the following purposes:

- To allow you to register for and use Our Products;
- To manage our relationship with you, including to ask you to periodically to correct/update the information that we hold and/or confirm your preferences;

- To send you updates and other communications or materials on topics from time to time which we believe may be of interest of you, but only where you have consented to receiving such communications;
- To improve Our Products;
- To draw up statistical and demographic data rendered anonymous and used for performance monitoring, published reports and data products, and trend forecasting.

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

- Where you have consented to our processing of your personal information.
- Where we need to perform the contract we are about to enter into or have entered into with you.
- 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.
- Where we need to comply with a legal obligation.

Where appropriate, we may rely on the following legitimate interests as our lawful basis for processing:

- To recover debts that are due to us in relation to any fees that are owed;
- To study how our users use our services;
- To develop our services and grow our business;
- For running our business.

## 10. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Marketing Data: 3 years from sign up

Customer Data: 6 years from the end of your customer relationship.

We take your rights to privacy and data security seriously.

## 11. How and Where Do You Store or Transfer My Personal Data?

To the extent that we transfer any of your personal data outside of the European Economic Area (the **EEA**), we will only transfer your personal data to firms outside of the EEA (i) with which we have entered into EU Standard Contractual Clauses (SCCs), (ii) that have legally binding corporate rules in place or (iii) where the jurisdiction of the relevant firm has the benefit of a European Commission adequacy decision. We use third party tools and may ask those third parties to process specific data. Where we do, we assess their policies on data security practices so as to meet the requirements set out in the Data Protection Legislation.

## 12. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for their own processing purposes. We work with several third-party partners who help us to manage and maintain Our Products, and to provide Our Products to you. These include web developers, analytics services, customer relationship management services, email services, and payment processing services.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## 13. How Can I Control My Personal Data?

In addition to your rights under the Data Protection Legislation, when you submit personal data via our Products, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes, we will ask you for positive consent and provide you with the ability to unsubscribe to future communications.

You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

## 14. Can I Withhold Information?

You may access certain areas of our Site or Product features without providing any personal data at all. However, to use all features and functions available on our Site or Products you may be required to submit or allow for the collection of certain data.

## 15. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within two weeks and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request

is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## 16. How Do You Use Cookies?

Our Products may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of our Site and to provide and improve our Products and Services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

By using our Products, you may also receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than us.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

We have provided more detail on our use of Cookies with Our Products in our Cookie Policy, which may be found below.

## 17. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following methods (marked for the attention of Privacy Officer):

Email address: [privacy@qredo.com](mailto:privacy@qredo.com)

Telephone number: +44 1394825764.

Postal Address: 124 City Road, London, EC1V 2NX.

## 18. Changes to this Privacy Policy

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we make changes to our business in a way that affects personal data protection.

Any immaterial changes will be immediately posted on our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.

Any material changes to our business or personal data protection will also be communicated directly to customers and users using the contact information we have on file.

This Privacy Policy was last updated on 18<sup>th</sup> August 2020

| <b>Updates to Privacy Notice</b> | <b>Date of update</b>  |
|----------------------------------|--|
| V 1.1                            | 18 August 2020 – removal of reliance on EU-US Privacy shield |
| V 1.0                            | 3 August 2020  |



# COOKIE POLICY

We understand that your privacy is important to you and are committed to being transparent about the technologies we use. In the spirit of transparency, this policy provides detailed information about how and when we use cookies on our Site.

## 19. Do we use Cookies?

Yes. We and our marketing partners, affiliates, and analytics or service providers use cookies, web beacons, or pixels and other technologies to ensure everyone who uses the Site has the best possible experience.

## 20. What is a Cookie?

A cookie ("Cookie") is a small text file that is placed on your hard drive by a web page server. Cookies contain information that can later be read by a web server in the domain that issued the cookie to you. Some of the cookies will only be used if you use certain features or select certain preferences, and some cookies will always be used. You can find out more about each cookie by viewing our current cookie list below. We update this list periodically, so there may be additional cookies that are not yet listed. Web beacons, tags and scripts may be used in the Site or in emails to help us to deliver cookies, count visits, understand usage, campaign effectiveness, and determine whether an email has been opened and acted upon. We may receive reports based on the use of these technologies by our service/analytics providers on an individual and aggregated basis.

## 21. Why do we use Cookies?

We generally use Cookies for the following purposes:

- To recognise new or past customers.
- To store your password if you are registered on our Site.
- To improve our Site and to better understand your visits on our platforms and Site.
- To integrate with third party social media websites.
- To serve you with interest-based or targeted advertising.
- To observe your behaviours and browsing activities over time across multiple websites or other platforms.
- To better understand the interests of our customers and our website visitors.

Some Cookies are necessary for certain uses of the Site, and without such Cookies, we would not be able to provide many services that you need to effectively use the Site. These Cookies, for example, allow us to operate our Site so you may access it as you have requested and let us recognise that you have created an account and have logged into that account to access Site content. They also include Cookies that enable us to remember your previous actions within the same browsing session and secure our Sites.

We also use functional Cookies and Cookies from third parties for analysis and marketing purposes. Functional Cookies enable certain parts of the site to work properly and your user preferences to remain known. Analysis Cookies, among other things, collect information on how visitors use our Site, the content and products that users view most frequently, and the effectiveness of our third-party advertising. Advertising Cookies assist in delivering ads to relevant audiences and having our ads appear at the top of search results. Cookies are either "session" Cookies which are deleted when you end your browser session, or "persistent," which remain until their deletion by you (discussed below) or the party who served the cookie. Full details on all the Cookies used on the Site are available at our Cookie Disclosure table below.

## 22. How to disable Cookies

Generally, you can activate or later deactivate the use of cookies through a functionality built into your web browser. To learn more about how to control cookie settings through your browser:

Go to the **"Private Browsing" setting and managing cookie settings** in Firefox;

Go to the **"Incognito" and managing cookie settings** in Chrome;

Go to the **"InPrivate" and managing cookie settings** in Internet Explorer; or

Go to the **"Private Browsing" and managing cookie settings** in Safari.

If you want to learn more about cookies, or how to control, disable or delete them, please visit <https://www.aboutcookies.org> for detailed guidance. In addition, certain third-party advertising networks, including Google, permit users to opt out of or customise preferences associated with your internet browsing. To learn more about this feature from Google, click [here](#).

To control flash cookies, which we may use on our Site from time to time, you can go to this [link](#) because Flash cookies cannot be controlled through your browser settings. Please note that if you decline the use of Cookies, some functions of the website may be unavailable, and we will not be able to present personally tailored content to you.

We may link the information collected by Cookies with other information we collect from you pursuant to this Privacy Policy and use the combined information as set forth herein. Similarly, the third parties who serve cookies on our Site may link your name or email address to other information they collect, which may include past purchases made offline or online, or your online usage information. If you are in the European Economic Area, you have certain rights that are described in our Privacy Policy under the header "What Are My Rights?", including the right to inspect and correct or delete the data that we have about you.

## 23. Cookies Disclosure: Qredo.com

| <b>Cookie</b> | <b>Description</b>   | <b>Duration</b> | <b>Type</b>       |
|---------------|--|-----------------|-------------------|
| bscookie      | This cookie is a browser ID cookie set by Linked share Buttons and ad tags.  | 2 years         | Advertisemen<br>t |
| test_cookie   | This cookie is set by doubleclick.net. The purpose of the cookie is to determine if the users' browser supports cookies.   | 15 minutes      | Advertisemen<br>t |
| _ga           | This cookie is installed by Google Analytics. The cookie is used to calculate visitor, session, campaign data and keep track of site usage for the site's analytics report. The cookies store information anonymously and assign a randomly generated number to identify unique visitors.                                      | 2 years         | Analytics         |
| _gid          | This cookie is installed by Google Analytics. The cookie is used to store information of how visitors use a website and helps in creating an analytics report of how the website is doing. The data collected including the number visitors, the source where they have come from, and the pages visited in an anonymous form. | 1 day           | Analytics         |
| liscc         | This cookie is provided by LinkedIn. This cookie is used for tracking embedded service.  | 1 year          | Analytics         |
| bcookie       | This cookie is set by LinkedIn. The purpose of the cookie is to enable LinkedIn functionalities on the page.   | 2 years         | Functional        |

|                  |   |         |            |
|------------------|---|---------|------------|
| lang             | This cookie is used to store the language preferences of a user to serve up content in that stored language the next time user visit the website.   | Session | Functional |
| lang             | This cookie is used to store the language preferences of a user to serve up content in that stored language the next time user visit the website.   | Session | Functional |
| lfdc             | This cookie is set by LinkedIn and used for routing.  | 1 day   | Functional |
| __cfduid         | The cookie is set by Cloudflare. The cookie is used to identify individual clients behind a shared IP address and apply security settings on a per-client basis. It does not correspond to any user ID in the web application and does not store any personally identifiable information.                                   | 4 weeks | Necessary  |
| __cfuid          | This cookie is set by Cloudflare and is a Google Chrome SameSite cookie. The cookie changes how Google Chrome handles the SameSite control. Google enforces SameSite to protect against marketing cookies that track users and Cross-site Request Forgery (CSRF) that allows attackers to steal or manipulate your cookies. |         | Other      |
| UserMatchHistory | LinkedIn - Used to track visitors on multiple websites, to present relevant advertisement based on the visitor's preferences.   | 4 weeks | Other      |

|                     |  |          |             |
|---------------------|--|----------|-------------|
| _gat_UA-138056337-1 | This is a pattern type cookie set by Google Analytics, where the pattern element on the name contains the unique identity number of the account or website it relates to. It is a variation of the _gat cookie which is used to limit the amount of data recorded by Google on high traffic volume websites. | 1 minute | Performance |
|---------------------|--|----------|-------------|

#### 24. Cookies Disclosure: Qredo.Network

| Cookie      | Description   | Duration   | Type      |
|-------------|---|------------|-----------|
| __cfduid    | The cookie is set by Cloudflare. The cookie is used to identify individual clients behind a shared IP address and apply security settings on a per-client basis. It does not correspond to any user ID in the web application and does not store any personally identifiable information. | 4 weeks    | Necessary |
| dd_rum_test | null  | 50 seconds | Other     |
| _dd_s       | null  | 15 minutes | Other     |