



COMPANY PRIVACY POLICY

Cydarity is committed to safeguarding your right to privacy. This privacy policy tells you about the information we collect from you when you use our website or contact us by email or by phone. When we collect your information we are acting as a data controller and, by law, we are required to provide you with information about us, about why and how we use your data, and about your rights regarding your data.

1. Who we are

- 1.1 We are Cydarity Limited ('Cydarity'). Our registered address is Kemp House, 160 City Road, London, EC1V 2NX. You may contact us using the contact form on the website, or by email to Info@cydarity.com or by telephone on +44 (20) 3290 8142.
- 1.2 We are not required to have a Data Protection Officer, so please direct any questions to the contact details above.
- 1.3 Cydarity does not share your personal information with any other organisations or other persons or third parties without your prior express approval. We are committed to safeguarding your data as a user of our services and fully respect the confidentiality of your information.



2. How we use your personal data

2.1 In this Section we have set out:

- (a) the general categories of personal data that we may process;
- (b) the purposes for which we may process personal data; and
- (c) the legal bases of the processing.

2.2 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interest in running our business and our website. Please refer to sections 7 and 8 for more information on cookies.

2.3 If you post messages on LinkedIn, we may process information that you post for publication on our website, or via links from our website to social media, or through our services ("**publication data**"). The publication data may be processed for the purposes of enabling such publication and administering our website and services. Please refer to LinkedIn's policies for detail of how you control the information you supply to LinkedIn:

<https://www.linkedin.com/legal/privacy-policy>

2.4 We may process information contained in any enquiry you submit to us regarding products and/or services ("**enquiry data**"). This enquiry data may include your name, address, telephone number, and email address, and will be provided by you verbally or through our website. The enquiry data may be processed for the purposes of offering, marketing



and selling relevant products and/or services to you. The legal basis for this processing is in taking steps at your request prior to entering into a contract with you. We will respond to your message and respond accordingly.

- 2.5 We may process information you submit to us in order to fulfil our obligations with regard the provision of products and/or services ("**transaction data**"). This transaction data may include details of your name, address, telephone number, and email address, and will be provided by you verbally or through our website. The legal basis for processing this transaction data is for the purposes of fulfilling our contractual obligations, as agreed in writing.
- 2.6 We may process any of your personal data identified in the other provisions of this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 2.7 In addition to the specific purposes for which we may process your personal data set out in this Section, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
- 2.8 Our website and the services operated by our organisation are not intended for use by children. If you are under 13 years of age, please consult your parent or guardian before contacting us.
- 2.9 Please do not supply any other person's personal data to us, unless we prompt you to do so.

3. Providing your personal data to others

- 3.1 We may disclose your personal data in order to execute any contract to which we are obligated by you, to other organisation's with whom you have independently engaged to assist you, insofar as reasonably necessary for the purposes set out in this policy.



- 3.2 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.
- 3.3 In addition to the specific disclosures of personal data set out in this Section 4, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

4. Retaining and deleting personal data

- 4.1 This Section 4 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 4.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 4.3 We will retain and delete your personal data as follows:
 - (a) *Usage Data* will be retained according to the table in section 8.
 - (b) *Publication data* will be retained according to LinkedIn's Privacy Policy, as amended from time to time.
 - (c) *Enquiry Data* that does not lead to provision of services will be retained for a maximum of 12 months following collection to assist with your enquiry, at the end of which period it will be deleted from our systems.
 - (d) *Transaction data* will be retained for the duration of the contract/our providing services and as long as is required to satisfy the requirements of UK legislation (typically 6 years), at the end of which period it will be deleted from our systems.



- 4.4 Notwithstanding the other provisions of this Section 4, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

5. Amendments

- 5.1 We may update this policy from time to time by publishing a new version on our website.
- 5.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 5.3 We may notify you of changes to this policy [by email or through the private messaging system on our website].

6. Your rights

- 6.1 We have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included here – please see the link to the ICO below. You should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.
- 6.2 Your principal rights under data protection law are:
- (a) the right to access;
 - (b) the right to rectification;



- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability - in situations where you have provided Personal Information directly to us, AND the lawful basis for processing is either via your consent or for the performance of a contract, AND we are processing by automated means;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

6.3 Full details of your rights are available from the [ICO website here](#).

6.4 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to the supply of appropriate evidence of your identity.

6.5 We may withhold personal information that you request to the extent permitted by law.

6.6 You may exercise any of your rights in relation to your personal data by email, telephone or in writing using the contact information provided in the [Introduction](#) above.

6.7 You have the right to complain about our use of your information directly to the Information Commissioner's Office via their website at <https://ico.org.uk/make-a-complaint/> or by writing to them:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF



7. About cookies

- 7.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 7.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 7.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

8. Cookies that we use

- 8.1 We use cookies for the following purposes:

Cookie Name	Purpose	Necessary Cookie	Functional Cookie	Marketing	Performance Cookie	Persistent / Session
_cfduid	Used by Cloudflare to speed-up page load times, this cookie does not allow for cross-site tracking and does not contain any user information.	✓				Persistent – Expires after 365 days.



_ga	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.			✓		Persistent – Expires after 2 years
_gat	Used by Google Analytics to throttle request rate			✓		Persistent – Expires after 24 hours.
_gid	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.			✓		Persistent – Expires after 48 hours
collect	Used to send data to Google Analytics about the visitor's device and behaviour. Tracks the visitor across devices and marketing channels.			✓		Session

9. Managing cookies

9.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <https://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);



- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

9.2 Blocking all cookies will have a negative impact upon the usability of many websites.

9.3 If you block cookies, you will not be able to use all the features on our website.

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