Associo Ltd Privacy Policy

1. Introduction and Scope

1.1 We are committed to safeguarding the privacy of our website visitors, service users, individual customers and customer personnel.

1.2 This policy applies where we are acting as a data controller with respect to the personal data of such persons; in other words, where we determine the purposes and means of the processing of that personal data.

1.3 This policy explains how we process personal data in accordance with applicable UK data protection law, including the UK GDPR and the Data Protection Act 2018.

1.4 Where we process personal data on behalf of customers as a processor, such processing is governed primarily by the applicable customer agreement and documented customer instructions.

1.5 We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website and services, we will ask you to consent to our use of cookies when you first visit our website.

1.6 In this policy, 'we', 'us' and 'our' refer to Associo Ltd. For more information about us, see Section 13.

2. The personal data that we collect

2.1 In this Section 2, we have set out the general categories of personal data that we process and, in the case of personal data that we did not obtain directly from you, information about the source and specific categories of that data.

2.2 We may process data enabling us to get in touch with you ('contact data'). The contact data may include your name, email address, telephone number, postal address and/or business contact details. The source of the contact data is you and/or your employer.

2.3 We may process your website or service-user account data ('account data'). The account data may include your account identifier, name, email address, business name, account creation and modification dates, website settings and marketing preferences. The primary source of the account data is you and/or your employer, although some elements of the account data may be generated by our website.

2.4 We may process personal data contained in contractual, billing and business relationship records, including correspondence, purchase orders, agreements, invoices and related administrative records.

2.5 We may process information contained in or relating to any communication that you send to us or that we send to you ('communication data'). The communication data may

include the communication content and metadata associated with the communication. Our website may generate metadata associated with communications made using website contact forms.

2.6 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.

3. Purposes of processing and legal bases

3.1 In this Section 3, we have set out the purposes for which we may process personal data and the legal bases of the processing.

3.2 Operations - We may process your personal data for the purposes of operating our website and for the administration, provision and support of our services and business operations, including generating invoices, billing documentation and related administrative records. The legal basis for this processing is our legitimate interests, namely the proper administration of our website, services and business operations, and, where applicable, the performance of a contract.

3.3 Relationships and communications - We may process contact data, account data, contractual data and/or communication data for the purposes of managing our relationships, communicating with you (excluding communications for direct marketing purposes) by email, post and/or telephone, providing support services and complaint handling. The legal basis for this processing is our legitimate interests, namely communications with website visitors, service users, customers and customer personnel, the maintenance of business relationships, the provision of support services, and the proper administration of our website, services and business operations, and, where applicable, contractual necessity.

3.4 Direct marketing - We may process contact data, account data and/or contractual data for the purposes of creating and sending direct marketing communications where permitted by applicable law, including where consent has been provided or where the soft opt-in applies under applicable electronic communications legislation. The legal basis for this processing is our legitimate interests, namely promoting our business and communicating relevant information, marketing messages and service updates to website visitors and service users. We will not send such communications to anyone who has opted out.

3.5 Research and analysis - We may process usage data and related information for the purposes of researching and analysing the use of our website and services, as well as researching and analysing interactions with our business generally. The legal basis for this processing is our legitimate interests, namely monitoring, supporting, improving and securing our website, services and business operations.

3.6 Record keeping - We may process your personal data for the purposes of creating and maintaining our business records, contractual records and administrative records generally. The legal basis for this processing is our legitimate interests, namely ensuring that we have access to the information necessary to properly and efficiently administer our business and services.

3.7 Security - We may process your personal data for the purposes of security and the prevention of fraud and other criminal activity. The legal basis for this processing is our legitimate interests, namely the protection of our website, services, business operations and users.

3.8 Insurance and risk management - We may process your personal data where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks and/or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.

3.9 Legal claims - We may process your personal data 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.

3.10 Legal compliance and vital interests - We may also process 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.

4. Providing your personal data to others

4.1 We may disclose or make available personal data to carefully selected third-party service providers, subcontractors, professional advisers, insurers and other business partners where reasonably necessary for the operation, security, support and delivery of our business and services. This may include providers of cloud hosting, infrastructure, authentication, analytics, electronic signature, accounting, communications and AI-enabled service functionality.

4.2 We use carefully selected third-party providers, including Microsoft 365 and Microsoft Azure, to support the operation, security and delivery of our business and services. Such providers maintain security and compliance programmes appropriate to the services they provide, including industry-standard certifications where applicable.

4.3 Financial transactions relating to the use of the Associo platform and the services we provide may be processed by third-party payment, accounting and billing providers.

4.4 In addition to the specific disclosures of personal data set out in this Section 4, we may 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. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims.

5. International transfers of your personal data

5.1 In this Section 5, we provide information about the circumstances in which your personal data may be transferred to countries outside the United Kingdom or European Economic Area under applicable data protection law.

5.2 Personal data processed by Associo may be stored and processed in the United Kingdom, the European Economic Area and other jurisdictions in which our service providers and infrastructure providers operate.

5.3 Associo uses cloud and AI-enabled infrastructure providers, including Microsoft Azure, in connection with the delivery and support of its services. Depending on the nature of the services provided and customer-specific configurations, personal data may be processed using infrastructure located outside the UK or EEA.

5.4 Where personal data is transferred outside the UK or EEA, we ensure that appropriate safeguards are implemented in accordance with applicable data protection law. These safeguards may include adequacy regulations, the UK International Data Transfer Agreement, the UK Addendum to the EU Standard Contractual Clauses, or equivalent lawful transfer mechanisms.

5.5 You acknowledge that any personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

6. Retaining and deleting personal data

6.1 This Section 6 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

6.2 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.

6.3 Unless a shorter or longer retention period is required by law, contract, security, audit, dispute-resolution or operational requirements, we generally retain business records and related personal data for up to seven years.

6.4 We regularly review retained information and securely delete or destroy records when they are no longer required.

6.5 Notwithstanding the other provisions of this Section 6, 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.

7. Your rights

7.1 In this Section 7, we have listed the rights that you have under data protection law.

7.2 Your principal rights under data protection law are:

(a) the right to access - you can ask for copies of your personal data;

(b) the right to rectification - you can ask us to rectify inaccurate personal data and to complete incomplete personal data;

(c) the right to erasure - you can ask us to erase your personal data;

(d) the right to restrict processing - you can ask us to restrict the processing of your personal data;

(e) the right to object to processing - you can object to the processing of your personal data;

(f) the right to data portability - you can ask that we transfer your personal data to another organisation or to you;

(g) the right to complain to a supervisory authority - you can complain about our processing of your personal data; and

(h) the right to withdraw consent - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.

7.3 These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting the ICO website at https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/.

7.4 You may exercise any of your rights in relation to your personal data by contacting us at info@associo.com.

7.5 If you are dissatisfied with how we process your personal data, you have the right to complain to the Information Commissioner's Office (ICO). Information about how to do so can be found at https://ico.org.uk/make-a-complaint/.

8. About cookies

8.1 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.

8.2 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 expiry date unless deleted by the user before that date. A session cookie, by contrast, expires at the end of the user session when the web browser is closed.

8.3 Cookies may not contain any information that personally identifies a user, but personal data that we store about you may be linked to information stored in and obtained from cookies.

9. Cookies that we use

9.1 We use cookies for the following purposes:

(a) authentication and status - we use cookies to identify you when you visit our website and as you navigate our website, and to help us determine if you are logged into our website;

(b) personalisation - we use cookies to store information about your preferences and to personalise our website for you;

(c) security - we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally;

(d) analysis - we use cookies to help us analyse the use and performance of our website and services; and

(e) cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally.

10. Cookies used by our service providers

10.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

10.2 We use Google Analytics to help analyse the use and performance of our website and services. Information about Google's processing of data can be found at https://policies.google.com/privacy.

11. Managing cookies

11.1 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.

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

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

12. Amendments and review

12.1 We may update this policy from time to time by publishing a new version on our website.

12.2 You should check this page occasionally to ensure that you are happy with any changes to this policy.

12.3 We may notify you of significant changes to this policy by email.

12.4 This policy is reviewed periodically and may be updated to reflect legal, regulatory, operational or business changes.

13. Our details

13.1 This website is owned and operated by Associo Ltd.

13.2 We are registered in England and Wales under registration number 11603102, and our registered office is at 1 The Green, Richmond, United Kingdom TW9 1PL.

13.3 You may contact us regarding privacy matters or the exercise of your data protection rights by email at info@associo.com.