



## **Privacy Policy & Cookie Tagging Policy**

Sqale is committed to developing a pure p2p model of data handling so that all your data is held by you. In the interim, we provide cloud storage for your data and will do our utmost to ensure your data is protected.

# Privacy Policy

Sqale understands that your privacy is important to you and that you care about how your information is used and shared online. We respect and value the privacy of everyone who visits Our Site and will only collect and use information in ways that are useful to you and in a manner consistent with your rights and Our obligations under the law.

This Policy applies to Our use of any and all data collected by us in relation to your use of Our Site. Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site 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 Site;   |
| “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 in section 12, below; |
| “Our Site”             | means the website Sqale.co and its app   |
| “UK and EU Cookie Law” | means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended in 2004, 2011 and 2015; and   |
| “We/Us/Our”            | means Sqale Ltd, a limited company registered in England under 11725174, whose registered address is 61 Maxted Road, Hemel Hempstead Industrial Estate, Hemel Hempstead, England, HP2 7DZ.   |

## 2. Information About Us

2.1 Our Site and webapp at <https://Sqale.co> is owned and operated by Sqale Ltd, a limited company registered in England under 11725174, whose registered address is 61 Maxted Road, Hemel Hempstead Industrial Estate, Hemel Hempstead, England, HP2 7DZ.

## 3. Scope – What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. It does not extend to any websites that are linked to from Our Site (whether We provide those links or whether they are shared by other users). 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 Data Do We Collect?

Some data will be collected automatically by Our Site [(for further details, please see section 12 on Our use of Cookies)], other data will only be collected if you voluntarily submit it, for example, when signing up for an Account. Depending upon your use of Our Site, We may collect some or all of the following data:

- 4.1 name;
- 4.2 date of birth;
- 4.3 contact information such as email addresses and telephone numbers;
- 4.4 demographic information such as preferences and interests;
- 4.5 address including post code
- 4.6 financial information such as credit / debit card numbers;
- 4.7 IP address (automatically collected);
- 4.8 web browser type and version (automatically collected);
- 4.9 operating system (automatically collected);
- 4.10 a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to (automatically collected);

## 5. How Do We Use Your Data?

- 5.1 All personal data is stored securely in accordance with the principles of the Data Protection Act 1998. For more details on security see section 6, below.
- 5.2 We use your data to provide the best possible products and services to you. This includes:
  - 5.2.1 Providing and managing your Account;
  - 5.2.2 Providing and managing your access to Our Site;
  - 5.2.3 Personalising and tailoring your experience on Our Site;
  - 5.2.4 Supplying Our products and services to you;
  - 5.2.5 Personalising and tailoring Our products and services for you;
  - 5.2.6 Responding to communications from you;
  - 5.2.7 Supplying you with email, notifications, newsletters, alerts that you have subscribed to (you may unsubscribe or opt-out at any time by changing notification settings on your profile.
  - 5.2.8 Market research;
- 5.3 With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email AND/OR telephone AND/OR text message AND/OR post with information, news and offers on Our products AND/OR services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the Data Protection Act 1998 and the Privacy and Electronic Communications (EC Directive) Regulations 2003, as amended in 2004, 2011 and 2015.
- 5.4 Users whose content appears on Our Site may engage in what is known as “behavioural advertising” – advertising which is tailored to your preferences, based on your activity. Your activity is monitored using Cookies, as detailed below in section 12. You can control and limit your data used in this way by adjusting your web browser’s privacy settings. Please note that We do not control the activities of such users, nor the information they collect and use. Limiting the use of your data in this way will not remove their advertising, but it will make it less relevant to your interests and activities on Our Site.

## 6. How and Where Do We Store Your Data?

- 6.1 We only keep your data for as long as We need to in order to use it as described above in section 5, and/or for as long as We have your permission to keep it.
- 6.2 Some or all of your data may be stored or transferred outside of the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland and Liechtenstein). You are deemed to accept and agree to this by using Our Site and submitting information to Us. If We do store or transfer data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the EEA and under the Data Protection Act 1998. Such steps may include, but not be

limited to, the use of legally binding contractual terms between Us and any third parties We engage and the use of the EU-approved Model Contractual Arrangements.

- 6.3 Data security is of great importance to Us, and to protect your data We have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected through Our Site.
- 6.4 Steps We take to secure and protect your data include https, password protection, CloudFlare.
- 6.5 Notwithstanding the security measures that We take, it is important to remember that the transmission of data via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting to Us data via the internet.

## 7. Do We Share Your Data?

- 7.1 We may sometimes contract with third parties to supply [products and] services to you on our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.
- 7.2 We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales and other information. All such data will be anonymised and will not include any personally identifying information. We may from time to time share such data with third parties such as prospective investors, affiliates, partners and advertisers. Data will only be shared and used within the bounds of the law.
- 7.3 In certain circumstances We may be legally required to share certain data held by Us, which may include your personal information, for example, where We are involved in legal proceedings, where We are complying with the requirements of legislation, a court order, or a governmental authority. We do not require any further consent from you in order to share your data in such circumstances and will comply as required with any legally binding request that is made of Us.

## 8. What Happens If Our Business Changes Hands?

- 8.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Data provided by users will, where it is relevant to any part of Our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use the data for the purposes for which it was originally collected by Us.
- 8.2 In the event that any of your data is to be transferred in such a manner, you will be contacted in advance and informed of the changes.

## 9. How Can You Control Your Data?

- 9.1 When you submit information via Our Site, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and by managing your Account).
- 9.2 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.

## 10. Your Right to Withhold Information

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

10.2 You may restrict your internet browser's use of Cookies. For more information, see section 12.

## 11. How Can You Access Your Data?

You have the legal right to ask for a copy of any of your personal data held by Us (where such data is held) on payment of a small fee which will not exceed £5. Please contact Us for more details at [info@Sqale.co](mailto:info@Sqale.co), or using the contact details below in section 13.

## 12. What Cookies Do We Use and What For?

12.1 Our Site 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. For more details, please refer to section 5, above, and to section 12.6 below. We have carefully chosen these Cookies and have taken steps to ensure that your privacy is protected and respected at all times.

12.2 By using Our Site 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. We use third party Cookies on Our Site. For more details, please refer to section 5, above, and to section 12.6 below. These Cookies are not integral to the functioning of Our Site.

12.3 All Cookies used by and on Our Site are used in accordance with current UK and EU Cookie Law.

12.4 Before Cookies are placed on your computer or device, you will be shown a pop-up prompt, requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.

12.5 Certain features of Our Site depend on Cookies to function. UK and EU Cookie Law deems these Cookies to be "strictly necessary". These Cookies are shown below in section 12.6. Your consent will not be sought to place these Cookies. You may still block these cookies by changing your internet browser's settings as detailed below in section 12.7, but please be aware that Our Site may not work as intended if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

12.6 No Cookies are placed on your computer or device.

12.7 You can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

12.8 You can choose to delete Cookies 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.

12.9 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.

## 13. Contacting Us

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at [info@Sqale.co](mailto:info@Sqale.co), by telephone on +44 7523 737587, or by post at 61 Maxted Road, Hemel Hempstead Industrial Estate, Hemel Hempstead, England, HP2 7DZ. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 11, above).

## 14. Changes to Our Privacy Policy

We may change this Privacy Policy as we may deem necessary from time to time, or as may be required by law. Any 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.