

Privacy and cookies policy

1. Introduction

We are committed to safeguarding the privacy of our website visitors. This policy applies where we are acting as a data controller with respect to the personal data of our website visitors that is supplied through this website; in other words, where we determine the purposes and means of the processing of that personal data.

We use cookies on our website. Insofar as required by applicable law, we will ask you to consent to our use of cookies when you first visit our website. For more information about managing cookies, see Section 14. More information about us and our handling of your personal data is set out in our terms and conditions.

2. How we use your personal data

In the table below and elsewhere in this Section 2 we have set out:

- the general categories of personal data that we may process;
- in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
- the purposes for which we may process personal data; and
- the legal bases of the processing.

Category	Description	Source	Purposes	Legal basis
Usage data	This is data about your use of our website and services, and 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	Our analytics tracking system	Analysing the use of the website and services	Legitimate interests, namely monitoring and improving our website and services
Account data	User account data with respect to our website	You	Operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you	Legitimate interests, namely the proper administration of our website and business
Publication data	Information that you post for publication on our website or through our services	You	Enabling publication and administering our website and services	Legitimate interests, namely the proper administration of our website and business

Enquiry data	Information contained in any enquiry you submit to us regarding our products or otherwise	You	Offering, marketing and selling relevant products to you	Consent
Transaction data	Information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website	You	Supplying the purchased products and keeping proper records of the transactions	The performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely the proper administration of our website and business
Notification data	Information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters	You	Sending you the relevant notifications and/or newsletters	Consent

We may process any of your personal data identified in 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.

We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks. In addition to the specific purposes for which we may process your personal data set out in this Section 2, 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.

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

We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

We may disclose your personal data, directly or indirectly, to our cloud services, hosting services, backup services and communications services providers, to enable them to provide those services.

We may also disclose your personal data to the third parties identified elsewhere on our website insofar as reasonably necessary for the purposes identified.

In addition to the specific disclosures of personal data set out in this Section 3, 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, whether in court proceedings or in an administrative or out-of-court procedure.

4. International transfers of your personal data

In this Section 4 and elsewhere on our website, we provide information about the circumstances in which your personal data may be transferred from a location within the European Economic Area (EEA) to a location outside the EEA.

In particular, we may make transfers to Australia, the Philippines, Singapore, Ukraine, the United Arab Emirates and/or the United States of America for the purpose of enabling the provision of hosting, back-up and content delivery services. These transfers will be protected by appropriate safeguards, namely the use of the standard contractual clauses (https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en) and/or the Privacy Shield scheme (<https://www.privacyshield.gov>).

You acknowledge that 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.

5. Retaining and deleting personal data

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. For more information about our data retention and deletion policies, see our contact page.

Notwithstanding the other provisions of this Section 5, 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.

6. Security of personal data

We will take appropriate technical and organisational precautions to secure your personal data and to prevent the loss, misuse or alteration of your personal data.

Data relating to financial transactions that is sent from your web browser to our web server, or from our web server to your web browser, will be protected using encryption technology.

You acknowledge that the transmission of unencrypted (or inadequately encrypted) data over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

You should ensure that any password you may use for our website is not susceptible to being guessed, whether by a person or a computer program. You are responsible for keeping the password you use for accessing our website confidential and we will not ask you for your password (except when you log in to our website).

7. Amendments

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

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

8. Your rights

In this Section 8, 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 in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

Your principal rights under data protection law are:

- the right to access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to object to processing;
- the right to data portability;
- the right to complain to a supervisory authority; and

- the right to withdraw consent.

You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

To the extent that the legal basis for our processing of your personal data is:

- consent; or
- that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,

and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

You may exercise any of your rights in relation to your personal data by written notice to us.

9. Third party websites

Our website includes hyperlinks to, and details of, third party websites.

We have no control over, and are not responsible for, the privacy policies and practices of third parties.

10. Updating information

Please let us know if the personal information that we hold about you needs to be corrected or updated.

11. About cookies and local storage

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.

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. 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.

Local storage is the storage of data sent by our web server to your web browser. This data is not sent back to the web server.

12. Cookies and local storage that we use

We use cookies for the following purposes:

- authentication - we use cookies to identify you when you visit our website and as you navigate our website;
- ecommerce and shopping cart - we use cookies to enable the functioning of our ecommerce systems and to maintain the state of your shopping cart;
- analysis - we use cookies to help us to analyse the use and performance of our website and services; and
- cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally.

We use local storage for the following purposes:

- browser tab synchronisation - to synchronise state, available features and limits between different web browser tabs;
- save settings - to save your sidebar lock / unlock settings; and
- ecommerce – to facilitate ecommerce functionality.

13. Cookies used by our service providers

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

We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at:

<https://www.google.com/policies/privacy/>.

Cloudflare is used to identify malicious visitors to our website, to reduce the chance of blocking legitimate users, and to provide customised services. For these purposes, Cloudflare uses a cookie. Find out more about the Cloudflare cookies at <https://www.cloudflare.com/cookie-policy/>.

14. Managing cookies

Our website includes cookie management options. For these purposes, there are two different categories of cookies. First, cookies that are necessary for the operation of our website and the provision of our services. Second, cookies that we use for analytics purposes. To use our website and services, your browser must accept the necessary cookies. However, you may accept or reject the analytics cookies. You can [manage the cookies](#) that you accept from our website.

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:

- <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- <https://support.apple.com/kb/PH21411> (Safari); and
- <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

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

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