

## Privacy and Cookies Notice

This notice was last changed on 26 April 2018.

We may change this notice from time to time.

You can contact us by the means mentioned below if you would like to see previous versions.

### 1 Who we are

We are Kreo Software Ltd.

Our registered address is at 71-75 Shelton Street, Covent Garden, London WC2H 9JH, England.

You may contact us with any queries and requests at the above address or by email at [info@kreo.net](mailto:info@kreo.net) or telephone at 02033719081.

### 2 This notice

This notice describes how we use the personal information of individuals who visit our website at [www.kreo.net](http://www.kreo.net) (our **Site**), and of individuals who represent our business contacts including our customers and suppliers. Please read this notice carefully.

This notice will apply whether the individual provided the information directly to us or we have obtained it from a third party.

Certain sections of this notice apply only to individuals in the European Economic Area and other countries which grant equivalent rights. This notice will identify those sections.

If you have any questions or need any further clarity please get in touch. Our contact details are set out above.

### 3 Data Collection and Usage

We will collect and use your personal information as described in the table below for the purposes described in that table. Please note that some of the information described below is your personal information only if you are a sole trader or in a small partnership.

	Information we collect	Purposes for which we use it	Why we use it
a.	<p>Information that you give us to <b>make a purchase for your business</b>, whether online, over the phone, in person or otherwise including:</p> <ul style="list-style-type: none"><li>Your contact details including: your name, role at your business, address, email address.</li><li>Your bank account details if you are a sole trader or in partnership.</li><li>The product or service you have purchased if you are</li></ul>	<p>We use this information to:</p> <ul style="list-style-type: none"><li>Provide our products and services to your business.</li><li>Manage and administer our services.</li><li>Process your business's order.</li><li>Take payment from your business or make a refund.</li><li>On-board your business as a client.</li></ul>	<p>We use this information because:</p> <ul style="list-style-type: none"><li>It's necessary to enter into and perform our contract with your business.</li><li>In the case of marketing communications, it is in our legitimate business interest to promote and develop our business. We will not use personal email addresses to send marketing communications unless we have the recipient's consent.</li></ul>

	a sole trader or in partnership.	<ul style="list-style-type: none"> <li>• Help us ensure that our customers are genuine and to prevent fraud.</li> <li>• In the case of individuals, make credit-checks.</li> <li>• Send marketing communications.</li> </ul>	
b.	<p>Information about the way <b>your business uses our services</b>, if you are a sole trader or partnership, including:</p> <ul style="list-style-type: none"> <li>• The products and services that we've provided or you've purchased.</li> <li>• When and where you've made the purchases.</li> <li>• What you paid and how.</li> </ul>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>• Develop and improve our services.</li> <li>• Identify products and services that may be of interest to you.</li> <li>• Perform statistical analysis and research.</li> </ul>	<p>We use this information because:</p> <ul style="list-style-type: none"> <li>• We have a legitimate business interest to improve our service and better understand how customers use it.</li> </ul>
c.	<p>Information when <b>we communicate with each other</b> whether in person, through our Site or via email, over the phone, through social media or via any other medium, including:</p> <ul style="list-style-type: none"> <li>• Your contact details (this may include your social media account if that's the way you communicate with us).</li> <li>• The details of your communications with us.</li> <li>• The details of our messages to you.</li> <li>• Whether you've opened electronic communications from us.</li> <li>• Whether you've clicked on links in electronic communications from us.</li> </ul>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>• Deal with any issues or concerns.</li> <li>• Monitor customer communications for quality and training purposes.</li> <li>• Develop and improve our products and services.</li> <li>• Personalise our service.</li> <li>• Administer our relationship with your business.</li> <li>• Send information about our services, unless you object to this.</li> </ul>	<p>We use this information because:</p> <ul style="list-style-type: none"> <li>• We have a legitimate business interest in understanding customer feedback, handling customer communications, and checking that our staff handle customer communications consistently.</li> <li>• It's necessary to perform our contract with your business.</li> </ul>

d.	<p><b>Information provided as part of your on-line registration</b> including:</p> <ul style="list-style-type: none"> <li>• Your username.</li> <li>• Your password.</li> <li>• Your account settings.</li> <li>• Your account preferences.</li> <li>• Your email address.</li> </ul>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>• Provide our products services.</li> <li>• Manage and administer our systems.</li> <li>• Identify how you'd like to use your registration with us.</li> </ul>	<p>We use this information because:</p> <ul style="list-style-type: none"> <li>• It's necessary to provide an on-line registration.</li> <li>• We have a legitimate business interest in enabling you to update your preferences and settings online.</li> </ul>
e.	<p>Information that we collect through <b>your use of our Site</b> including:</p> <ul style="list-style-type: none"> <li>• Device information such as operating system, unique device identifiers, the mobile network system.</li> <li>• Hardware and browser settings.</li> <li>• Date and time of requests.</li> <li>• The requests you make.</li> <li>• The pages you visit and search engine terms you use.</li> <li>• IP address.</li> </ul>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>• Provide our services.</li> <li>• Develop and improve our products and services.</li> <li>• Identify issues with the Site and users' experience of it.</li> <li>• Monitor the way our Site is used.</li> </ul>	<p>We use this information because:</p> <ul style="list-style-type: none"> <li>• We have a legitimate business interest in understanding how our Site is accessed, how it is used, any security issues affecting its operation, and any problems users have with it across multiple devices.</li> </ul>
f.	<p><b>Information that we collect from third parties.</b></p> <p>These third parties include <b>suppliers and business partners</b>, such as:</p> <ul style="list-style-type: none"> <li>• Credit reference agencies and your bank or card issuer, if you are a sole trader or partnership.</li> <li>• Data brokers.</li> <li>• Construction businesses, surveyors and related businesses.</li> </ul>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>• Provide our products and services.</li> <li>• Take payments and make refunds to your business.</li> <li>• Help us to prevent fraud.</li> <li>• Promote our products and services.</li> <li>• Perform statistical analysis and research into our clients.</li> </ul>	<p>We use this information because:</p> <ul style="list-style-type: none"> <li>• It is necessary to enter into or perform our contract with your business, that we collect information from some third party sources to process payments, give refunds and make credit checks.</li> <li>• We have a legitimate business interest in understanding our customer base.</li> </ul>

	<ul style="list-style-type: none"> <li>• Analytics services and advertisers who place third party cookies on our Site.</li> </ul> <p>These third parties also include public sources such as social media.</p> <p>The information collected from such third parties includes:</p> <ul style="list-style-type: none"> <li>• Information on your credit status, if you are a sole trader or partnership.</li> <li>• Contact and professional details of individuals working for organisations and businesses.</li> <li>• Information on the pages you visit on our Site and any links your click and other sites you visit.</li> </ul>	<ul style="list-style-type: none"> <li>• Build relationships with other organisations.</li> <li>• Combine this information with other types of information mentioned above.</li> </ul>	<ul style="list-style-type: none"> <li>• We have a legitimate business interest in promoting and developing our business and maintaining a public profile.</li> <li>• We have a legitimate interest in understanding how people use our Site.</li> <li>• We have a legitimate interest in allowing third party advertisers to use our Site and in analysing what services and services visitors to our Site are interested in.</li> </ul>
g.	<p>Information that we collect about users of our services:</p> <ul style="list-style-type: none"> <li>• Device information such as operating system, unique device identifiers, the mobile network system.</li> <li>• Hardware and browser settings.</li> <li>• Date and time of access.</li> <li>• Personal information they provide when using the service including information in materials they upload to the service.</li> <li>• The pages and functions they use.</li> <li>• IP address.</li> </ul>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>• Improve our services, trouble-shoot issues with them, and develop new services, and may combine it with other information, and categorise such information, about them for these purposes.</li> <li>• Administer and operate our services.</li> </ul>	<p>We use this information because:</p> <ul style="list-style-type: none"> <li>• We have a legitimate business interest in operating, developing and improving our business.</li> </ul>

Where we have based our use of personal data on our legitimate interests, this will apply only where we consider that our legitimate interest is not overridden by the individual's interests or rights which require protection of their personal data.

### **Legal requirements and professional advice**

Your personal information may also be processed if it is necessary on reasonable request by a law enforcement or regulatory authority, body or agency or in the defence of a legal claims.

We may also use your personal information when obtaining professional (including legal advice) in relation to audits and our business and consider this in our legitimate interests in managing our business.

### **If you do not provide information**

In certain circumstances, where you do not provide personal information which is required (for example, credit checks and contact details), we will not be able to provide the products and services under our contract.

## **4 How long we keep your information**

Where your business has entered into a contract with us, we will keep your information used in performing the contract for the length of the contract and for six years after that, in case of any claims relating to the contract.

We will keep other information related to your use of our products and services for a reasonable length of time to understand how our customers use them and to understand the impact of any changes we may make. This will not be any longer than three years.

Where you register with us through our Site, we will keep your information while you keep your registration. If you ask to remove your registration, we will keep your information for a reasonable length of time in case any issues arise with your registration. This will not be any longer than six months unless this information is used in the performance of a contract with your business.

We will keep information collected through your use of our Site for a reasonable length of time to understand how people use our Site and to address any technical issues with the operation of the Site.

We will collect information related to the security of our systems and operations for a reasonable length of time to monitor and address security issues.

We will not delete personal information if relevant to an investigation or a dispute. It will continue to be stored until those issues are fully resolved.

## **5 Information we share with other parties**

There are certain circumstances where we may transfer your personal data to the following types of third parties:

- Contractors or service providers who process your personal data for us, in order to provide services to us, such as Amazon Web Services or other IT hosting services, backup and disaster recovery specialists and parties who provide support and maintenance services for our IT systems.
- Credit reference agencies, in the case of personal data of sole traders and small partnerships.

- Payment processors such as Stripe.
- Business partners involved in the provisions of services to you, such as parties who provide you with software or IT services used in conjunction with the products and services that we supply.
- Banks or financial firms for the purposes of processing payments and refunds.
- Our professional advisors, such as lawyers, auditors and accountants, and IT and technical consultants.
- Business partners to whom we may introduce you where they provide products and services which we think may be of interest to you.
- Business partners who introduce customers to us, such as HubSpot.
- Competent authorities such as tax authorities, courts, regulators and security or police authorities where required or requested by law or where we consider it necessary.
- Parties to which we're discussing selling part or all of our business, in connection with the proposed sale.
- Parties to which we sell any of our business so that they can continue to provide services to you.
- Parties to which we consider we need to provide your information in order to make or defend legal claims.

We require our service providers to meet our standards on processing information and security. We will provide them with your information only in connection with the performance of their function.

We also ask all such third parties to observe suitable confidentiality requirements.

Your personal data may be shared if it is made anonymous and aggregated, as in such circumstances the information will cease to be personal data.

## **6 Countries where your information will be held**

We may transfer you information outside the EEA if the GDPR (under Article 49) or applicable law of a country outside the European Union allows this. This includes where the transfer is necessary for in order for us to enter into or perform a contract with your business or in connection with legal proceedings.

If we will otherwise transfer your personal information outside the EEA, we will update this notice.

## **7 Your rights**

This section 7 applies only to individuals in the European Economic Area and other countries which grant the rights described below.

Individuals in those countries may have certain rights in relation to your information, listed below, and then explained in further detail. These rights will apply only in certain circumstances.

- You can ask us to confirm if we are processing your information.
- You can ask to access your information.
- You can ask to correct your information if it's wrong.
- You can ask us to restrict our use of your information.
- You can ask us to delete your information ("right to be forgotten").
- You can ask us to stop using your personal information.
- You can ask us to help you move your information to you or other companies. To help with that, you have a right to ask that we provide your information in an easily readable format.
- **You have the right to complain to the relevant supervisory authority or data protection regulator.**
- **Where you have provided consent to our use of your information, you can withdraw that consent at any time.**

### **Exercising these rights**

If you wish to exercise any of these rights, please contact us using the means mentioned in section 1 above.

Where we receive a request to exercise one of these rights, we shall provide information on the action we take on the request without undue delay and in any event within one month of receipt of the request. This may be extended by a further two months in certain circumstances, for example, where requests are complex or numerous.

We will provide the information to you free of charge, except where your requests are manifestly unfounded or excessive, for example, you make repeated requests for the same information. In these circumstances we may charge a reasonable fee or may refuse to act on the request. We will advise an individual of any fees prior to proceeding with a request.

We may ask for additional information to verify your identity before carrying out a request.

Where we do not carry out your request, we will tell you so without delay and within one month of receipt of the request, and we will explain our reasons for not taking the action requested.

### **Right to access personal data**

You have the right to confirm the following with us:

- Whether or not we process personal data about you.
- Certain information about the processing.

You also have a right to access the personal data and be provided with a copy.

### **Right to rectification of personal data**

If you believe that the personal data we hold on you is inaccurate, you may request that we correct it. You may also request us to complete personal data about you which is incomplete.

### **Right to restrict processing of personal data**

You have the right to request that we restrict processing of your personal data where one of the following applies:

- You claim that the personal data is not accurate. The restriction will apply until we have taken steps to ensure the accuracy of the personal data.
- The processing is unlawful but you do not want us to erase the personal data.
- We no longer require the personal data for the purposes of processing, but you still need it in connection with a legal claim.
- You have exercised your right to object to the processing. The restriction will apply until we have taken steps to verify whether we have compelling legitimate grounds to continue processing.

### **Right to request deletion of personal data ("right to be forgotten")**

You request the erasure of your personal data In certain circumstances, including the following (this is not an exhaustive list):

- The personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed.
- You have withdrawn your consent and we have no other legal basis for processing it.
- You have exercised your right to object to the processing and have no overriding legitimate grounds to continue processing it.

Under certain circumstances, we may refuse a request for erasure, for example, where we need to use the personal data to comply with a legal obligation or to the establish, make or defend legal claims.

If you exercise your right to erasure, this will potentially remove records which we hold for your benefit, such as your presence on a marketing suppression list.

### **Right to object to processing of personal data**

You have a right, at any stage, to object to our using your personal information for to send your marketing information.

You also have the right to object to our using your personal data where our reason is based on our legitimate interests. We will have to stop processing until we can establish that we have compelling legitimate grounds which override your interests, rights and freedoms, or that we need to continue using it for the establishment, exercise or defence of legal claims.

### **Right to data portability**

This right applies where:

- Our reason for using your personal data is either that you have given consent or that the processing is necessary for us to perform a contract with you (you are a sole trader or in a small partnership); and
- We process the personal data electronically.

This is a right to receive all the personal data which you have provided to us in a structured, commonly used and machine-readable format and to transmit this to another controller directly, where this is technically feasible.

### **Supervisory Authority**

You have a right to complain to a supervisory authority, in particular in the European Union country where you live or work or where you consider we have infringed your rights under the GDPR.

## **8 Confidentiality and security**

We have implemented reasonable technical and organisational measures designed to secure your personal information from accidental loss and unauthorised access, use, alteration or disclosure.

However, as regards information transmitted via the Internet, the Internet is an open system and we cannot and do not guarantee or warrant the security of any information that an individual you transmits on or through our Site or that we otherwise maintain, although our Site uses the secure file transfer protocol where appropriate.

## **9 Cookies, tags and similar technologies**

A cookie is a small text file which includes a unique identifier that is sent by a web server to your computer, mobile phone or any other internet enabled device when you visit an on-line site. Cookies and these other technologies are widely used to make websites work efficiently and to collect information about your online preferences. For simplicity, we refer to all these technologies as "cookies".

You can find more information about cookies, behavioural advertising and online privacy, and about how you can manage and delete them, at [www.allaboutcookies.org](http://www.allaboutcookies.org) or [www.youronlinechoices.eu](http://www.youronlinechoices.eu).

We use cookies and other tracking technologies to customise content and advertising, provide social media features and to see how our visitors move through our website. We use this information to make decisions about ways to improve the services we offer you.

The types of cookies we use are as follows:

**Essential cookies.** These cookies are essential for parts of our Site to operate. They enable you to move around our Site and allow us to recognise you within our Site so that we can provide you with service that you have asked for such as remembering your sign-in details.

**Functionality cookies.** These cookies help us customise our Site content based on your preferences. They remember choices you make, your language, the country you visit our Site from and any changes you make to text size or other parts of our web pages. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

**Performance cookies.** These cookies collect information on how you use our Site in order to help us improve areas such as navigation and to help us fix technical issues or errors. For example, we use these cookies to help us understand how you arrive at our Site, browse or use our Site and highlight areas where we can improve.

**Targeting cookies.** These cookies collect information about your browsing habits in order to make advertising, and the content we deliver, more relevant to you and your interests. They are also used to limit the number of times you see an advert or particular content, as well as help measure the effectiveness of an advertising or marketing campaign. These cookies are usually placed by third party advertising networks. They remember the websites you visit and that information is shared with other parties such as advertisers.

**Social Media cookies.** These cookies allow you to share our Site on social media. These cookies are not within our control. Please refer to the respective privacy policies for how their cookies work.

**Web beacons.** Some of our web pages may contain electronic images known as web beacons (also known as clear gifs, tags or pixels) that allow us to count users who have visited our pages. Web beacons collect only limited information, e.g. a cookie number, time and date of a page view, and a description of the page on which the web beacon resides. We may also carry web beacons placed by third party advertisers. These beacons do not carry any information that could directly identify you.

**Third party cookies:** We may engage third party tracking and advertising providers to act on our behalf to track and analyse your usage of our Site through the use of cookies, pixel tags / web beacons, and similar technologies. These third parties collect, and share with us, usage information about visits to our Site, and sometimes by correlating this information with other information (e.g. your IP address) measure and research the effectiveness of our advertisements, track page usage, help us target our recommendations and advertising, and track use of our recommendations and advertisements.

At any time, you can prevent cookies from being set on your browser. For instructions on how to block, delete or disable any cookies, please consult your browser's 'Help' or 'Support' section. Please note that by deleting our cookies or disabling future cookies you may not be able to access certain areas or features of our Site.

Please consult the following links for information on cookie management and blocking according to your browser:

Explorer: <http://windows.microsoft.com/en-gb/internet-explorer/delete-manage-cookies#ie=ie-11>.

Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

Chrome: <https://support.google.com/chrome/answer/95647?hl=en>

Safari: [https://support.apple.com/kb/PH19214?locale=en\\_GB](https://support.apple.com/kb/PH19214?locale=en_GB)

You can also find more information and manage cookie storage at: [www.youronlinechoices.eu](http://www.youronlinechoices.eu)