

PROSPERO SOFTWARE LIMITED PRIVACY POLICY

We respect your privacy and are committed to protecting your personal data. This privacy notice will inform you as to how Prospero collects, processes and looks after your personal data when you visit our website (regardless of where you visit it from) and by using our services. It will also tell you about your privacy rights and how the law protects you.

Prospero Software Limited is the controller and responsible for your personal data (collectively referred to as “Prospero” “we”, “us” or “our” in this privacy notice). If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact Stephen Shakespeare at 07970 272628 or email steve@prosperosoftware.co.uk

THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified either directly or indirectly.

We may collect, use, store and transfer different kinds of personal data to include:

- Your identity and contact details;
- Information about how you use our website and services;
- Your preferences in receiving marketing from us and our third parties and your communication preferences;
- Your bank payment details when you pay for our services;

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to provide our services to you. In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- our day to day business dealings in providing our services to you;
- filling in forms or by corresponding with us by post, phone, email or otherwise;
- if you complete a survey or provide us with feedback;
- as you interact with our website, we may automatically collect data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies;
- by using publicly accessible sources; and/or
- via a third party such as your bank or building society or other financial institutions when you pay for our services;

HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to provide the services we have agreed to or are about to agree to;
- It is necessary to protect your vital interests if you are physically or legally incapable of giving consent;
- Where it is necessary for our legitimate interests (or those of a third party) which means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your

rights before we process your personal data for our legitimate interests.

- Where we need to comply with a legal or regulatory obligation.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us on the details above.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below a description of all the ways we plan to use your personal data:

To register you as a Customer of Prospero, to process and deliver our services, to assess the quality of our services, manage payments, fees, and charges, to collect and recover money owed to us for our services, to manage our relationship with you, informing you of changes to our privacy policy or terms and conditions, to administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data), to make suggestions and recommendations to you about goods or services that may be of interest to you.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

MARKETING

We may use your data to form a view on the products and services. You will receive marketing communications from us if you have requested information from us and you have not opted out of receiving that marketing.

You can ask us or third parties to stop sending you marketing messages at any time by contacting us.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of you staying with us or using our services or other transactions.

DISCLOSURES OF YOUR PERSONAL DATA

As part of the services we provide to you, we may have to share your personal data with third parties such as:

- Third parties as part of our service to you such as self-employed contractors, payment processors, agents or IT providers;
- the police or other law enforcement agencies if we have to by law or court order;
- professional advisers including lawyers, bankers, auditors, accountants and insurers;
- HM Revenue & Customs, regulators and other authorities; and
- third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to

process your personal data for specified purposes and in accordance with our instructions.

INTERNATIONAL TRANSFERS

Your information will be held at our offices, by our service providers and in our IT providers data centres. In order for us to provide our services to you, from time to time we may have to share your personal data outside the European Economic Area (EEA). This could include where our service providers are based outside the EEA (for example our IT cloud services), if you are based outside the EEA, if there is an international element to the services we are providing or if one of our employees need to access our data remotely from outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission;
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US;
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe;
- Where the transfer is not repetitive, information is limited, the transfer is necessary for our legitimate interests and those interests do not override your own and we have put appropriate safeguards in place to protect your data.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, accounting, or reporting requirements. This is usually 6 years.

THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not necessarily control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You are entitled to:

- request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. This includes your right to have the data corrected, updated or amended. You will not normally have to pay a fee for this, but we will let you know if we feel that it is fair to charge a fee.

- Object to and/or restrict processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. Please note that in some instances we may have to stop providing our services to you but we will notify you if this is the case.
- Request the transfer of your personal data to you or to a third party, for example if you chose to use another business to provide services to you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

If you wish to exercise any of the rights set out above, please contact Stephen Shakespeare. Our contact details are at the top of this page.

COMPLAINTS OR CONCERNS

If you have any queries or concerns about the way we process your personal data then please contact Stephen Shakespeare. We hope that we can resolve any concerns for you, but if you wish to take your complaint further you can contact the Information Commissioners Office (ICO) and further information can be found on their website www.ico.org.uk.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy below.

INFORMATION ABOUT OUR USE OF COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

Please note that other third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.