

## Website Privacy Policy

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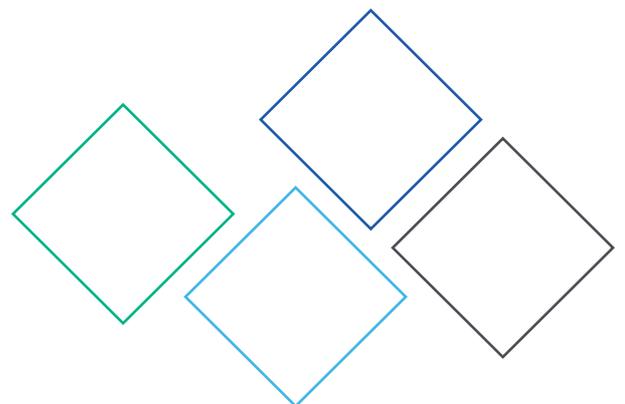
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**We keep our privacy policy under regular review; it was last updated: 22<sup>nd</sup> May 2018.**

## **INTRODUCTION**

ByBox is committed to protecting your privacy. Data Protection Legislation governs the handling of all personal data by ByBox. ByBox is entirely committed to complying with Data Protection Legislation in order to protect the personal privacy of all individuals whose data we hold. This privacy statement explains what personal data ByBox collects from you, through our interactions with you and through our products, and how we use, disclose and store that data.

## **DATA CONTROLLER**

The data controller of our website (and our related services) is ByBox Holdings Limited whose registered office is Winchester House, Oxford Science Park, Heatley Road, Oxford, England, OX4 4GE. Our company registration number is 4130988. Our nominated Data Protection Representative dealing with data protection issues is Mark Bromwell CTO.

## **COLLECTION OF PERSONAL INFORMATION**

Personal information is data that can be used to identify or contact a single person.

## **WHAT PERSONAL INFORMATION WE COLLECT**

- Name
- Email address
- Phone number
- Job title
- Business address

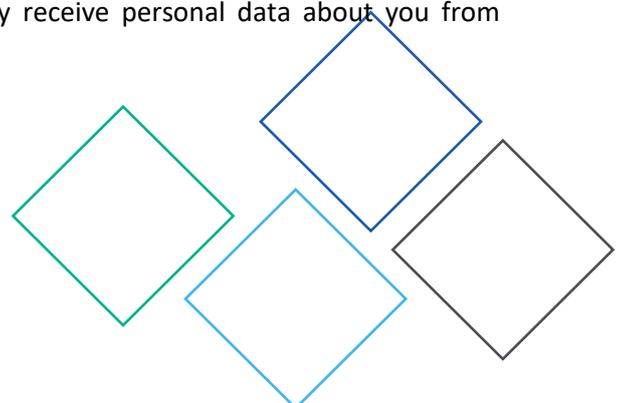
## **HOW WE COLLECT PERSONAL INFORMATION**

ByBox collects data to operate effectively and provide you with the best experience.

You may provide us with data by filling out our contact form.

We obtain some of this data by recording how you interact with us, by, for example, using technologies like cookies, and receiving error reports or usage data from software running on your device.

- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this data by using cookies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources
  - Technical Data from the following parties:



(a) analytics providers [such as Google];

(b) advertising networks based inside and outside the EU; and

(c) search information providers, such as:

- Identity and Contact Data from data brokers or aggregators based outside the EU.
- Identity and Contact Data from publicly available sources [such as Companies House and the Electoral Register based inside the EU.

### How We Use Personal Data

We will only use the personal information you provide to us for the following purposes:

- To operate effectively and perform any contractual obligations
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override these interests
- Notifying you of information relating to our products and services

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party 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.

### Storage of Personal Information

Personal data collected by us will be evaluated periodically to determine whether we should continue to hold it. You will be notified from time to time through our mailings of the continued use of your personal data and be given the opportunity to notify us if you do not wish to continue to receive mailings.

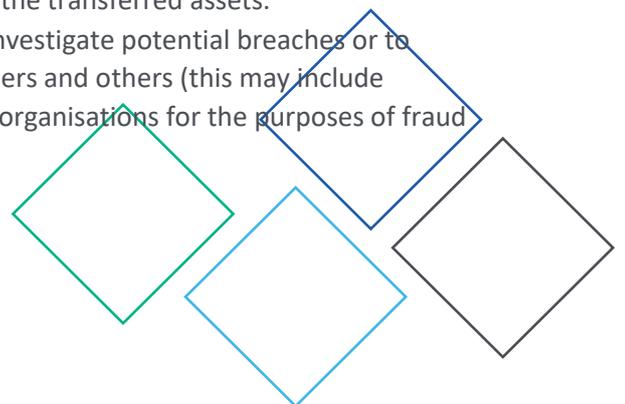
We will not be exporting your data outside the European Union and will only be storing the information supplied by you together with details of the activities you have undertaken with us and mailings we have sent to you on your data file.

### Disclosure of Personal Information

We share your personal data with the relevant personnel within ByBox to deal with your enquiry. We also share data with subsidiaries; with vendors working on our behalf; when required by law or to respond to legal process; to protect our customers; to protect lives; to maintain the security of our products; and to protect the rights or property of ByBox.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If we, or substantially all of our assets, are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets.
- In order to enforce or apply contractual terms, to investigate potential breaches or to protect the rights, property or safety of our customers and others (this may include exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction).



- Where this is required by law or where this is necessary for the performance of a service we provide to you.

We may provide aggregate statistics about customers, sales, traffic partners and related site information to reputable third party vendors but these will not include any personally identifying information.

### Protection of personal information

ByBox takes the security of your personal information very seriously. We hold your personal data via a Secure CRM.

## YOUR COMMUNICATIONS PREFERENCES

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

## PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased [goods or services] from us [or if you provided us with your details when you entered a competition or registered for a promotion] and, in each case, you have not opted out of receiving that marketing.

You can choose whether you wish to receive promotional communications from ByBox by email or telephone. If you receive promotional email or SMS from us and would like to opt out, you can do so by following the directions in those messages.

## Integrity and Retention of Personal Information

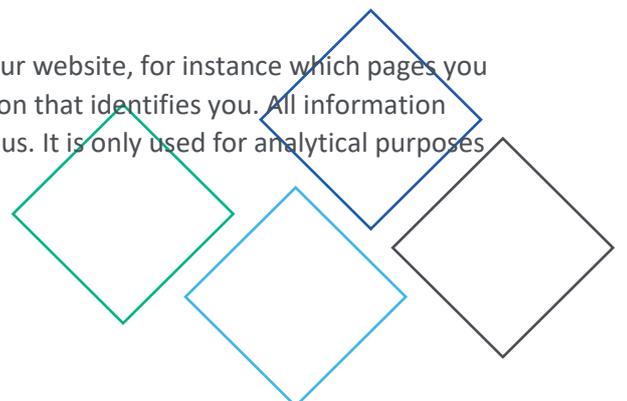
We will retain your personal information for the period necessary to fulfil the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

\*Should you elect to 'opt out', our standard policy is to retain personal data, for marketing purposes, for no longer than 2 years (from the date of 'opt out').

*\*If you are a customer please refer to our Third Party Data Protection Policy (Data Retention Section).*

## COOKIES

We use cookies to collect information about how you use our website, for instance which pages you go to most often. We don't use cookies to collect information that identifies you. All information collected using these is aggregated and therefore anonymous. It is only used for analytical purposes and to inform us how our website works.



For further information please see our Cookie Policy <https://www.bybox.com/gb/cookie-policy/>.

## YOUR CONSENT

By using our contact form, you consent to our collection and use of your personal data for the purposes set out above. In the event that we decide to change our privacy policy we will post such changes on the website and on relevant documents in order that you are always aware of the information we collect, how we use it and under what circumstances we disclose it.

## YOUR RIGHTS

Under the Data Protection Legislation, you have rights as an individual which you can exercise in relation to the information we hold about you.

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require ByBox to change incorrect or incomplete data;
- require ByBox to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of your data where ByBox is relying on its legitimate interests as the legal ground for processing.

You can read more about these rights here - <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>.

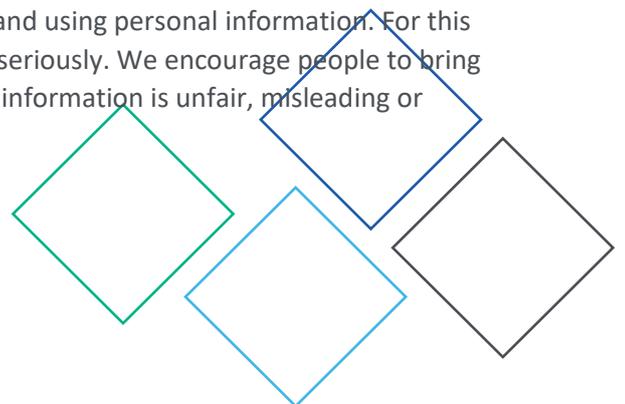
## HOW TO ACCESS AND CONTROL YOUR PERSONAL DATA

For personal information we hold, we will provide you with access (including a copy) for any purpose, including to request that we correct the data if it is inaccurate or delete the data if ByBox is not required to retain it by law or for legitimate business purposes. We may decline to process requests that are frivolous/vexatious, are extremely impractical, or for which access is not otherwise required by law (if this is the case we will notify you and inform you that we are refusing your request and the reason(s) why).

You can contact ByBox by emailing [marketing@bybox.com](mailto:marketing@bybox.com). We will respond to requests to access or delete your personal data within one month.

## RIGHT TO LODGE A COMPLAINT

ByBox tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate.



This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspect of ByBox’s collection and use of personal information. However, we are happy to provide any additional information or explanation needed.

If you have any questions or concerns about ByBox’s Privacy Policy or data processing or if you would like to make a complaint please contact us by emailing [marketing@bybox.com](mailto:marketing@bybox.com).

Should you wish to lodge a complaint about the way ByBox is handling your personal information, you are able to raise your concerns with the ICO (the supervisory body). You can do this through their website: <https://ico.org.uk/concerns/handling/>.

### **LEAVING OUR WEBSITE**

ByBox websites, products, applications, and services may contain links to third-party websites, products and services. Any external links are not the responsibility of ByBox. Once you have clicked on a link to an external site it will be subject to that organisation’s privacy policy.

