

## **OUR PRIVACY POLICY**

Landmark Information Group Limited (“we”, “us” or “our”) is a company incorporated in England and Wales with company number 02892803. Our registered office is 7 Abbey Court, Eagle Way, Sowton Industrial Estate, Exeter, EX2 7HY.

We are committed to preserving your privacy. This policy relates solely to processing of personal data in relation to RiskHorizon and sets out the basis on which any personal data we collect from you, that you provide to us or that we obtain from other sources, will be processed by us. This includes personal data we use in connection with:

- use of the RiskHorizon Platform and services Platform;
- sale and provision of our products and services;
- any of our related services when you call or otherwise contact us; and
- the provision of our newsletters and updates.

For the purpose of data protection laws, the data controller is Landmark Information Group Limited of 7 Abbey Court, Eagle Way, Sowton Industrial Estate, Exeter, EX2 7HY. We are registered as a data controller with the Information Commissioner's Office under number Z6064030.

In relation to the use of our Platform at [www.risk-horizon.com](http://www.risk-horizon.com) or our processing of personal data more generally outside of RiskHorizon please refer to our privacy policy appearing on that Platform.

In relation to the provision of the RiskHorizon services themselves, we are engaged by our customers as a data processor and for the purpose of data protection laws the data controller is our customer. We will process such personal data in accordance with our instructions from our customer and in accordance with data protection laws. Please refer to our customer's privacy policy for the basis on which any personal data processed within the services will be processed by them. To the extent that we receive your personal data to administer any agreement and the relationship with our customer or in connection with either party's obligations under any such agreement, we shall process such personal data in connection with our business activities acting as a controller and this privacy policy shall apply.

### **1 BASIS FOR PROCESSING PERSONAL DATA**

1.1 Paragraphs 1.2 – 1.8 below explain how and why we process your personal data, as well as the legal basis on which we carry out this processing.

#### **1.2 To enter into and perform contracts with you:**

Where you ask us to provide RiskHorizon products and / or services to you, we will process your personal data to provide these products and / or services to you including where we have arranged for the supply of another company's products or services to you or where you are in discussions with us about any new product or service. Our use of your personal data in this way includes sharing your personal data with our employees and other personnel, partner agencies and suppliers such as hosting service providers, payment service providers, cloud based email and CRM system providers, and marketing and public relations agencies, We need to process your personal data in this way to enter into and fulfil our contract with you for sale of products or supply of services at your request. If you do not wish to provide us with your personal data in this way, you will be unable to purchase our products and / or use our services.

### 1.3 **To communicate with you:**

Where you: submit a complaint or enquiry to us; provide feedback to us; sign up to our updates and / or newsletters; or otherwise provide us with any submissions, we will process your personal data so that we can respond to your complaint / enquiry, provide you with the information you requested and / or otherwise communicate with you. The legal basis on which we process your personal data in these circumstances is our legitimate interest as a business to respond to customer communications and requests, and to maintain customer satisfaction.

### 1.4 Otherwise as part of our legitimate interests:

We may also use and process your personal information where it is necessary for us to pursue our legitimate interests as a business, or that of a third party, for the following purposes:

- for marketing activities (other than where we rely on your consent to contact you by email or text with information about our products and services or share your details with third parties to do the same, as explained above);
- for analysis to inform our marketing strategy, and to enhance and personalise your customer experience (including to improve the recommendations we make to
- to verify the accuracy of data that we hold about you and create a better understanding of you as a customer;
- for network and information security in order for us to take steps to protect your information against loss or damage, theft or unauthorised access;
- for prevention of fraud and other criminal activities;
- to comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request); and
- for the establishment and defence of our legal rights.

### 1.5 **To make our RiskHorizon products and services Platformbetter:**

We may also process personal data in order to provide you with a more tailored experience, including using personal data to make sure our Platform is displayed in the most effective way for the device you are using. This processing means that our services will be more tailored to you.

We also use various third-party cookies to help us improve our Platform (more details are set out in [our cookie policy](#)), but we will not share your personal data with the third-party analytics and search engine providers that assist us in the improvement and optimisation of our Platform.

We will also process personal data for the purposes of making our Platform more secure, and to administer our Platform and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes. This will include processing personal data to investigate any suspected breach of the [Terms of Use](#).

The legal basis on which we process personal data in these circumstances is our legitimate interest to provide you with a better user experience, and to ensure that our Platform is kept secure.

The use of any non-essential cookies is subject to your consent. You can also prevent us from using your personal data in this way by using the 'do not track' functionality in your internet browser. If you enable such do not track functionality, our Platform may be less tailored to your needs and preferences.

## 1.6 **For marketing purposes:**

1.6.1 We will process your personal data to provide you with marketing communications if you have requested information from us or purchased products or services from us (including from other companies within our group of companies), and, in each case, you have not opted out of receiving that marketing. We may use external marketing agents to help us with such marketing communications. The legal basis on which we process personal data for marketing purposes is our legitimate interest to develop our products and services and grow our business.

1.6.2 You can ask us to stop sending you marketing communications at any time by writing to [ESG@landmark.co.uk](mailto:ESG@landmark.co.uk) or where relevant, by following the unsubscribe link in any marketing communication you receive from us. Where you opt out of receiving these marketing communications, this will not apply to personal data provided to us as a result of a product or service purchase or other transaction.

## 1.7 **If our business is sold:** We will transfer your personal data to a third party:

1.7.1 in the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets (at all times in accordance with all applicable data protection laws); or

1.7.2 if Landmark Information Group Limited or substantially all of its assets are acquired by a third party, in which case personal data held by Landmark Information Group Limited about its customers will be one of the assets transferred to the purchaser,

in each case, the legal basis on which we process data in these circumstances is our legitimate interest to ensure our business can be continued by a purchaser. If you object to our use of personal data in this way, the relevant seller or buyer of our business may not be able to provide products or services to you.

## 1.8 Where there is a legal requirement: In certain circumstances we may also need to share your personal data if we are under a duty to disclose or share personal data in order to comply with any legal obligation. This may include assisting any regulator or other public authority or criminal investigation body; (ii) to identify you when you contact us; and/or (iii) to verify the accuracy of data we hold about you. **Categories of Information we collect from YOU**

We will collect and process the following personal data:

## 1.9 **Information you give us:** This is information about you that you give us when you visit, register, create an account or order products and / or services on our Platform

or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you sign up for our newsletters and / or updates, submit enquiries and / or complaints to us, , enter a promotion or event, complete a survey and/or when you report a problem with our Platform. The information you give us may include names, addresses, email addresses phone numbers, enquiry details and may include records of any correspondence.

- 1.10 **Information about other persons that you provide us with:** Where you have provided personal data about another person (for example, where you are a business customer and you provide us with the name and address of other employees or one of your customers who require one of our products or services (such as a search report)), we need to process such personal data in order to communicate with those employees and provide these products and / or services to the other person or people. By providing such information, you confirm that you have informed such third parties of our use of their information and that you have obtained their consent or are otherwise lawfully permitted to share their information with us.
- 1.11 **Information we collect:** With regard to visits to our Platform we will automatically collect the following information:
  - 1.11.1 technical information, including the Internet protocol (IP) address used to connect computers to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, screen resolution, operating system and platform; and
  - 1.11.2 information about visits, including the full Uniform Resource Locators (URL), clickstream to, through and from our Platform (including date and time), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page.
- 1.12 **Information we receive from other sources:** We do not collect information about you from third party sources. .
- 1.13 We do **not** process any special categories of personal data, meaning personal data revealing: racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; genetic or biometric data that uniquely identifies individuals; or data concerning an individual's health, sex life or sexual orientation.
- 1.14 We do not process data relating to criminal convictions unless legally obliged to do so.

## 2 USES MADE OF THE INFORMATION

We will combine the information you provide to us with information we collect about you. We will use this information and the combined information for the purposes set in this policy (depending on the types of information we receive).

### 2.1 Others who may receive or have access to your personal information

#### 2.1.1 Group companies

We may share your information with other companies within Landmark. They may use your personal information in the ways set out in Uses made of the information in connection with the products and/or services that complement our own range of

products and/or services.

Please see the start of this policy for the details of our group companies with whom we may share your personal information.

## 2.2 Our suppliers and service providers

2.2.1 We may disclose your information to our third party service providers, agents, subcontractors and other organisations for the purposes of providing services to us or directly to you on our behalf. Such third parties may include platform hosts, cloud service providers (such as hosting and email management), advertising agencies and administrative services.

2.2.2 When we use third party service providers, we only disclose to them any personal information that is necessary for them to provide their service and we have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions.

## 2.3 Customer satisfaction surveys

2.4 As customer satisfaction is important to us, we may ask a third party research company to contact you for the sole purpose of gathering general information and specific information relating to us and our products and services.]

## 2.5 Other ways we may share your personal information

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation. We may also transfer your personal information if we're under a duty to disclose or share it in order to comply with any legal obligation, to detect or report a crime, to enforce or apply the terms of our contracts or to protect the rights, property or safety of our visitors and customers. We will always take steps with the aim of ensuring that your privacy rights continue to be protected.

## 3 WHERE WE STORE PERSONAL DATA

3.1 The data that we collect from you may be stored in a location outside of the European Economic Area. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. Any transfer of your personal data made by us to a location outside of the EEA will be governed by the relevant set of model contract clauses approved by the European Commission, which we will make available to you on request.

3.2 All information you provide to us is stored on secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Platform, you are responsible for keeping this password confidential. You must not share your password with anyone.

## **4 PERIOD OF STORAGE**

- 4.1 If we collect your personal information, the length of time we retain it is determined by a number of factors including the purpose for which we use that information and our obligations under other laws. We do not retain personal information in an identifiable format for longer than is necessary.
- 4.2 We may need your personal information to establish, bring or defend legal claims. For this purpose, we will always retain your personal information for 7 years after the date it is no longer needed by us for any of the purposes listed above. The only exceptions to this are where:
  - 4.3 the law requires us to hold your personal information for a longer period, or delete it sooner;
  - 4.4 you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law (see further Erasing your personal information or restricting its processing below); or
  - 4.5 in limited cases, the law permits us to keep your personal information indefinitely provided we put certain protections in place.
- 4.6 Where you purchase products from us, we will retain your data for a period of six (6) years in a managed service after the service ends, to ensure that we are able to assist with any questions or feedback in relation to our goods or to enforce, or protect, or defend our legal rights. Where the use is for a licenced service we will retain your data for a period of 6 months after termination of the licence to enable the handover of any personal data involved if requested. Where we have processed your personal data to provide marketing communications with your consent, we may contact you at least every twelve (12) months to ensure you are happy to continue receiving such communications. If you tell us that you no longer wish to receive such communications, your personal data will be removed from our mailing lists.

## **5 RIGHTS UNDER DATA PROTECTION LAWS**

- 5.1 You have a number of rights in relation to your personal information under data protection law. In relation to certain rights, we may ask you for information to confirm your identity and, where applicable, to help us to search for your personal information. Except in rare cases, we will respond to you within one month from either (i) the date that we have confirmed your identity or (ii) where we do not need to do this because we already have this information, from the date we received your request.

### **Right to object and automated decisions**

- 5.2 You have the right to object to us processing your personal data where we are processing your personal data:
  - 5.2.1 based on our legitimate interests (as set out above). If you ask us to stop processing your personal data on this basis, we will stop processing your personal data unless we can demonstrate compelling grounds as to why the processing should continue in accordance with data protection laws; and

5.2.2 for direct marketing purposes. If you ask us to stop processing your personal data on this basis, we will stop.

5.3 You may also contest a decision made about you based on automated processing by writing to [ESG@landmark.co.uk](mailto:ESG@landmark.co.uk).

#### Right of access

5.4 You have the right to receive confirmation as to whether your personal data is being processed by us, as well as various other information relating to our use of your personal data. You also have the right to access your personal data which we are processing.

5.5 Please note where you register your details for certain services and open a user account that you can then use to access and log on to use those services, you may change or update your user name and password or other details at any time via your account.

#### Right to rectification

5.6 You have the right to require us to rectify any inaccurate personal data we hold about you. You also have the right to have incomplete personal data we hold about you completed, by providing a supplementary statement to us.

#### Right to restriction

5.7 You have the right to restrict our processing of your personal data where:

5.7.1 the accuracy of the personal data is being contested by you while we investigate;

5.7.2 the processing by us of your personal data is unlawful, but you do not want the relevant personal data erased;

5.7.3 we no longer need to process your personal data for the agreed purposes, but you want to preserve your personal data for the establishment, exercise or defence of legal claims; or

5.7.4 while we investigate any objection by you where we are processing your data on the basis of our legitimate interest (as set out above).

5.8 Where any exercise by you of your right to restriction determines that our processing of particular personal data are to be restricted, we will then only process the relevant personal data in accordance with your consent, to protect other people's rights or important public interests and, in addition, for storage purposes and for the purpose of legal claims.

#### Right to data portability

5.9 You have the right to receive your personal data in structured, standard machine-readable format and the right to transmit such personal data to another controller.

#### Right to erasure

5.10 You have the right to require we erase your personal data which we are processing where one of the following grounds applies:

- 5.10.1 the processing is no longer necessary in relation to the purposes for which your personal data was collected or otherwise processed;
  - 5.10.2 our processing of your personal data is based on your consent, you have subsequently withdrawn your consent and there is no other legal ground we can use to process your personal data;
  - 5.10.3 you object to the processing in as set out in section 5.2.1 of this policy and we have no overriding legitimate interest for our processing;
  - 5.10.4 the personal data have been unlawfully processed; and
  - 5.10.5 the erasure is required for compliance with a law to which we are subject.
- 5.11 Unless there is a reason that the law allows us to use your personal information for longer, we will make reasonable efforts to comply with your request. We may process your personal information whilst its processing is restricted if we have your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings. You have the right to lodge a complaint with the Information Commissioner's Office, the supervisory authority for data protection issues in England and Wales.

#### Withdrawing your consent

- 5.12 Where we rely on your consent as the legal basis for processing your personal information, as set out above, you may withdraw your consent at any time by contacting us using the details at the end of this policy. If you would like to withdraw your consent to receiving any direct marketing to which you previously opted-in, you can do so by writing to [ESG@landmark.co.uk](mailto:ESG@landmark.co.uk). If you withdraw your consent, our use of your personal information before you withdraw is still lawful.

#### Exercising rights

- 5.13 You can exercise such rights by writing to [ESG@landmark.co.uk](mailto:ESG@landmark.co.uk)

Your information may be converted into statistical or aggregated data in such a way as to ensure that you are not identified or identifiable from it. Aggregated data cannot be linked back to you as a natural person. We may use this data for analytical and research purposes.

## **6 LINKS ON OUR PLATFORM**

Our Platform may, from time to time, contain links to and from the Platforms of our partner networks, advertisers and affiliates. If you follow a link to any of these Platforms, please note that you have left our Platform and these Platforms have their own privacy policies. We do not accept any responsibility or liability for these policies or Platforms. Please check these policies before submitting any personal data to these Platforms.

## **7 CHANGES TO OUR PRIVACY POLICY**

Any changes we make to our privacy policy in the future will be posted on this webpage and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.



## **8 CONTACT**

Questions, comments and requests regarding this privacy policy are welcomed. You can contact us by writing to us at [ESG@landmark.co.uk](mailto:ESG@landmark.co.uk)

This privacy policy was last updated on 19 October 2020.