



Highcohesion Limited

Company Number 12020025

3rd Floor 86-90 Paul Street, London, EC2A 4NE, United Kingdom

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Website Privacy Policy

1 INTRODUCTION

1.1 Important information and who we are

Welcome to Highcohesion Limited's Privacy and Data Protection Policy ("**Privacy Policy**").

At Highcohesion Limited ("**we**", "**us**", or "**our**") we are committed to protecting and respecting your privacy and Personal Data in compliance with the law and guidelines of the UK General Data Protection Regulation and Data Protection Act 2018 ("**Data Protection Law**").

This Privacy Policy explains how we collect, process and keep your data safe. The Privacy Policy will tell you about your privacy rights and how the law protects you.

The individuals from which we may gather and use data can include:

Customers

Suppliers

Business contacts

Employees/Staff Members

Third parties connected to your customers

and any other people that the organisation has a relationship with or may need to contact.

This Privacy Policy applies to all personal data processed at any time about any individual who is

not a part of Highcohesion or any of its subcontractors.

1.2 Our relationship to you

We may act as a controller or a processor of your personal data, depending on the context in which we received it.

Whether you are one of our development partners or clients, we will be a controller of your personal data if the data relates to you or any of your employees with whom we work in order to perform the contract we have entered into with you.

We will act as a processor of your personal data if you are an end customer of any of our clients whose data passes through our platform.

In either case, we are not obliged by Data Protection Law to appoint a data protection officer and have not voluntarily appointed one at this time. Therefore, any inquiries about your data should either be sent to us by email at support@highcohesion.com or sent in a letter to 3rd Floor 86-90 Paul Street, London, EC2A 4NE, United Kingdom.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

1.3 Our responsibility to you

If we act as a data controller in respect of your personal data, we must:

- Ensure that all processing of Personal Data is governed by one of the legal bases laid out in Data Protection Law (see 2.2 below for more information on those bases);

- Ensure that processors authorised to process Personal Data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality;

- Implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk associated with the processing of Personal Data;

- Maintain a record of all categories of processing activities we carry out;

- Cooperate, on request, with the supervisory authority in the performance of its tasks;

- Ensure that any person acting under our authority who has access to Personal Data does not process Personal Data except on our instructions; and

After becoming aware of a Personal Data Breach, notify the supervisory authority and relevant data subjects, if required to do so by Data Protection Law.

1.4 Where We Are Acting as a Data Processor

Where we are acting as a data processor, your personal data will flow through our platform when it is streamed from one endpoint to another. However, we do not retain any of this data after it is streamed. We have no control over the exact nature of the data that clients choose to transfer by means of our platform, and do not make any use of it beyond the transfer itself.

2 LEGAL BASIS FOR DATA COLLECTION

2.1 Types of Data / Privacy Policy Scope

“Personal Data” means any information about a living individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of Personal Data about you which we have grouped together below. Not all of the following types of data will necessarily be collected from you but this is the full scope of data that we collect and when we collect it from you:

Profile/Identity Data: This is data relating to your first name, last name, gender, date of birth.

Contact Data: This is data relating to your phone number, addresses, email addresses, phone numbers.

Marketing and Communications Data: This is your preferences in receiving marketing information and other information regarding new integrations or product features created by Highcohesion or our partners.

Billing Data: This is information relating to your debit and credit card information such as the name attached to your payment details and your billing address.

Transactional Data: This is information of details and records of all payments you have made for our services or products.

We also collect, use and share Aggregated Data such as to improve product performance. Aggregated Data could be derived from your Personal Data but is not considered Personal Data in law as this data will not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this Privacy Policy.

We may also aggregate data to enable research or analysis so that we can better understand and serve you and others. For example, we may conduct research on your demographics and usage. Although this aggregated data may be based in part on Personal Data, it does not identify you personally. We may share this type of anonymous data with others, including service providers, our affiliates, agents and current and prospective business partners.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

2.2 The Legal Basis for Collecting That Data

There are a number of justifiable reasons under Data Protection Law that allow collection and processing of Personal Data. The main avenues we rely on are:

“Contractual Obligations”: We may require certain information from you in order to fulfil our contractual obligations and provide you with the promised service.

“Legal Compliance”: We’re required by law to collect and process certain types of data such as fraudulent activity or other illegal actions.

“Legitimate Interest”: We might need to collect certain information from you to be able to meet our legitimate interests - this covers aspects that can be reasonably expected as part of running our business, that will not have a material impact on your rights, freedom or interests. Examples could be your name, so that we have a record of who to contact when performing our contract with you. We do not typically rely on consent as a legal basis for collecting or processing your personal data.

3 HOW WE USE YOUR PERSONAL DATA

3.1 Our Uses

We will only use your Personal Data when the law allows us to. Set out below is a table containing the different types of Personal Data we collect and the lawful basis for processing that data. Please refer to section 2.2 for more information on the lawful basis listed in the table below.

Examples provided in the table below are indicative in nature and the purposes for which we use your data may be broader than described but we will never process your data without a legal basis for doing so and it is for a related purpose. For further inquiries please contact us.

Type of data	Lawful basis for processing data
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Contact Data	Contractual necessity
Marketing and Communications Data	Legitimate Interest: to grow our business
Billing Data	Contractual necessity
Transaction; Data	Contractual necessity, compliance with laws
Aggregated data (where you are identifiable)	Legitimate interests: to grow our business, improve our services, and obtain analytics about how our platform is used.

3.2 Marketing and Content Updates

You will receive marketing and new content communications from us if you have created an account and provided us with your email address. From time to time we may make suggestions and recommendations to you about services or third-party software products that may be of interest to you.

3.3 Change of Purpose

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. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

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.

4 YOUR RIGHTS AND HOW YOU ARE PROTECTED BY US

4.1 What Control Do I Have Over Highcohesion Limited's Use of My Personal Data?

You may delete your account at any time – this will remove your account page from our systems and our related software.

this will delete almost all the personal data we store about you, though we reserve the right to retain any personal data that we need to keep for legal reasons after our contract with you has ended.

Your account information will be protected by a password for your privacy and security. You need to prevent unauthorized access to your account and personal information by selecting and protecting your password appropriately and limiting access to your computer or device and by signing off after you have finished accessing your account.

You can access information associated with your account by logging into the account you created with us.

4.2 How Does Highcohesion Limited Protect Customers' Personal Data?

We are concerned with keeping your data secure and protecting it from inappropriate disclosure. We implement a variety of security measures to ensure the security of your Personal Data on our systems, including By adopting a secure protocol and encrypting our databases and infrastructure. Any Personal Data collected by us is only accessible by a limited number of employees who have special access rights to such systems and are bound by obligations of confidentiality. If and when we use subcontractors to store your data, we will not relinquish control of your Personal Data or expose it to security risks that would not have arisen had the data remained in our possession.

Our main subcontractors are [Amazon](#), [Chargebee](#) and [Datadog](#), and you can read their privacy policies by clicking on the relevant links above.

However, unfortunately no transmission of data over the internet is guaranteed to be completely secure. It may be possible for third parties not under the control of Highcohesion Limited to intercept or access transmissions or private communications unlawfully. While we strive to protect your Personal Data, we cannot ensure or warrant the security of any Personal Data you transmit to us. Any such transmission is done at your own risk. If you believe that your

interaction with us is no longer secure, please contact us.

4.3 Opting Out of Marketing Promotions

You can ask us to stop sending you marketing messages at any time by clicking the relevant link in every email we send you.

Where you opt out of receiving these marketing messages, we will add your name/email address to our opt-out list.

5 YOUR DATA AND THIRD PARTIES

5.1 Will We Share Your Data with Third Parties?

We may also share Personal Data with interested parties in the event that Highcohesion Limited anticipates a change in control or the acquisition of all or part of our business or assets or with interested parties in connection with the licensing of our technology.

If Highcohesion Limited is sold or makes a sale or transfer, we may, in our sole discretion, transfer, sell or assign your Personal Data to a third party as part of or in connection with that transaction. Upon such transfer, the Privacy Policy of the acquiring entity may govern the further use of your Personal Data. In all other situations your data will still remain protected in accordance with this Privacy Policy (as amended from time to time).

We may share your Personal Data at any time if required for legal reasons or in order to enforce our terms or this Privacy Policy.

5.2 Third-Party Links

Our platform 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 control these third-party websites and are not responsible for their privacy statements. When you leave our platform, we encourage you to read the privacy policy of every website you visit.

6 HOW LONG WILL WE RETAIN YOUR DATA FOR?

We will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for. We may retain your Personal Data for a longer period than usual in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.

7 INTERNATIONAL TRANSFERS OF DATA

Some of our external third-party suppliers and subcontractors are based outside the UK, so their processing of your personal data will involve a transfer of data outside the UK. Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by putting

in place a valid legal transfer mechanism, as permitted under data protection law.

8 YOUR RIGHTS

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

- Request access to the personal data we hold about you;
- Request corrections to any of the personal data we hold, if it is inaccurate;
- Ask us to erase your personal data;
- Object to the way we process your personal data; or
- Request transfer of your personal data in a commonly-used file format.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances. If you wish to exercise any of the rights set out above, please contact us. We try to respond to all legitimate requests within one month. Occasionally it could 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.

9 NOTIFICATION OF CHANGES AND ACCEPTANCE OF POLICY

We keep our Privacy Policy under review and will place any updates on this webpage. This version is dated 27 November 2020. By using any of our services, you consent to the collection and use of data by us as set out in this Privacy Policy. Continued access or use of the same will constitute your express acceptance of any modifications to this Privacy Policy.