

# Data Privacy Policy

## What This Policy Covers

- This Data Privacy Policy applies to the personal data that Extrinsicica Global collects and uses. References in this Privacy Notice to “Extrinsicica Global”, “we”, “us” or “our” mean Extrinsicica Global Limited. We are a company registered in England and Wales, with company number 07293625 and registered address at 9<sup>th</sup> Floor, 107 Cheapside, London, EC2V 6DN
- In our capacity as a cloud managed service provider Extrinsicica Global act both as;
  - “Data Controller” for the personal data we collect through our website and use to manage the provision of services to our customers; and
  - “Data Processor” or “Data Sub-processor” for personal data submitted to our cloud services by our customers.
- This Policy sets out how we collect, use and protect personal data within each context of data ownership listed above.
- The policy will:
  - Clearly outline Extrinsicica Global’s obligations as a “Data Controller”;
  - Explain the types of data that we may collect and where applicable, where personal data is collected in our role as “Data Controller”;
  - How and why we collect and use your personal data;
  - Explains when and why we will share personal data with Third-Parties or Service Providers;
  - Defines the security measure we adopt to keep your data protected;
  - Explains the rights and choices you have when it comes to your personal data.
- Extrinsicica Global are committed to:
  - Managing personal data responsibly in accordance with this policy and Appendix (1) Extrinsicica Global Security Statement;
  - Routinely reviewing all policy and procedures associated with data privacy and security;
  - Removing personal data from our systems where explicit notice has been received to do so and in accordance with our obligations as either the “Data Controller”, “Data Processor” or Data Sub-Processor”;
  - Publishing revisions to this Privacy Policy on our company website;
- If you have any queries, questions or would like to report an issue regarding this policy please contact us using:
  - [compliance@extrinsicicaglobal.com](mailto:compliance@extrinsicicaglobal.com)
  - +44 (0) 1865 987 449
  - Privacy Request, John Eccles House, Robert Robinson Avenue, Oxford, OX4 4GP
- Our websites may contain links to other websites operated by external organisations that have their own privacy policies. Please make sure that you read the terms and conditions and privacy policy carefully before providing any personal data on a third-



party website as we do not accept any responsibility or liability for websites of other organisations.

## What Data We Store

- This section tells you what data we hold and why we hold it and what our specific obligations are regarding “Personal Data” that is held on our systems in the context of each of the roles listed above.
- When using the term “Personal Data” in this Privacy Policy, we mean information that relates to an individual and allows Extrinsicica Global to identify you, either directly or in combination with other information that we may hold. Personal Data includes, for example, name, contact details or data gathered from when you contact us.

## Data Controller

- When you contact us through our website, correspond with us or otherwise use our services, we may collect a range of personal data:
  - Identity Data, including first name, last name, title, date of birth and gender.
  - Contact Data, including address, email address and telephone numbers.
  - Financial and Transaction Data, including payment details and other information about services you have purchased from us.
  - Technical Data, including internet protocol address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website and services.
  - Usage Data, including information about how you use the website.
  - Marketing and Communications Data, including your preferences in receiving marketing from us and our third parties and your communication preferences.

## Data Processor

- In our capacity as a cloud managed service provider Extrinsicica Global predominantly act as the “Data Processor” and most of the personal data that Extrinsicica Global hold is customer data where the customer is the “Data Controller”.
- Our processing of customer personal data as a data processor is governed by the terms of the agreement we enter with each customer. If we are contacted by a data subject about the processing of personal data when we act as a data processor, we will notify the data controller and not respond to the data subject without written instruction from the data controller.

## How and Why we use Personal Data

### To Provide You with Products and Services

- Each product and service we offer has different information requirements, Therefore, the personal information we may need, and what it is needed for, can differ. Data acquired in this manner will be used for the performance of contract with you and may include Identity Data, Contact Data, Financial and Transaction Data, Technical Data and Usage Data.

### To enhance or improve your user experience with us.

- We may use Technical Data and Usage Data to carry out research and internal research and development, and to improve our information technology systems (including security) and our product range and services.

### To provide you with information about products and services

- We may use Identity Data, Contact Data, Usage Data and Marketing and Communications Data to periodically send promotional materials about our products and services that we believe will be of interest to you. We do this for legitimate interests and with every notification will give you the option to opt out from receiving future materials.
- We may use Identity Data, Contact Data and Marketing and Communications Data to provide you with relevant marketing communications (including by email, post), relating to products and services of our suppliers. We will only do this with your consent.

### To Keep Your Personal Information Secure

- To minimise the risk of unauthorised access to your personal information, we use Identity Data and Technical Data to authenticate your identity when using the website and our Customer Service helpdesk

### Sharing Data with Third-Parties or Service Providers

#### Service Providers

- We work with carefully selected Service Providers that carry out certain functions on our behalf. These include, companies that help us with technology services, storing and combining data, processing payments and delivering orders. We only share personal data where it is necessary to provide services to you.



## Third-Parties

- We may share personal data with other organisations in the following circumstances:
  - If the law or a public authority says we must share the personal data;
  - If we need to share personal data in order to establish, exercise or defend our legal rights (this includes providing personal data to others for the purposes of preventing fraud and reducing credit risk);
  - To an organisation we sell or transfer (or enter into negotiations to sell or transfer) any of our businesses or any of our rights or obligations under any agreement we may have with you to any other successors in title to our business.
  - Where you have consented to the sharing of the data for marketing purposes.

## How We Protect Personal Data

- We know how important it is to protect and manage your personal data. This section sets out some of the measures we have in place.
- We provide technical and organisational security to ISO 27001 standards and undertake to take all reasonable precautions in order to preserve the security of the data and, in particular, to protect against any accidental or unlawful destruction, accidental loss, corruption, unauthorised circulation or access, as well as against any other form of unlawful processing or disclosure to unauthorised persons.
- We use computer safeguards such as firewalls and data encryption, and we enforce physical access controls to our buildings and files to keep this data safe. We only authorise access to employees who need it to carry out their job responsibilities.
  - We protect the security of your information while it is being transmitted by encrypting it using Secure Sockets Layer (SSL).
  - We enforce physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of personal data.
  - We may ask for proof of identity before we share your personal data with you.
- However, whilst we take appropriate technical and organisational measures to safeguard your personal data, please note that we cannot guarantee the security of any personal data that you transfer over the internet to us.

## Cookies and Similar Technologies

- Cookies are small data files that allow a website to collect and store a range of data on your desktop computer, laptop or mobile device.
- We use traffic cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to our customer needs. We only use this information for statistical analysis and then the data is removed from our system. Please see our Cookie Policy which details the cookies in use by our website.
- Cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can modify your



browser settings to decline cookies should you prefer but this may prevent you from taking full advantage of the website.

- You can amend your cookie settings through your browser's settings.

## Your Rights

- You have the right 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.
  - Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
  - Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request for erasure and we will give you specific legal reasons if this is the case.
  - Object to 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. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
  - Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
  - Request the transfer of your personal data to you or to a third party.
  - Withdraw consent at any time where we are relying on consent to process your personal data. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.
- If you would like to exercise any of these rights, please contact us:
  - by post to Privacy Request- at Extrinsica Global Limited, John Eccles House, Robert Robinson Avenue, Oxford, OX4 4GP; or by email [compliance@extrinsicaglobal.com](mailto:compliance@extrinsicaglobal.com)

- 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 may refuse to comply with your request in these circumstances.
- We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- 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 have previously agreed to us using your information for direct marketing purposes, you may change your mind at any time by writing to us as [compliance@extrinsicaglobal.com](mailto:compliance@extrinsicaglobal.com)