

SymTerra Privacy Notice

Keamore Limited respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we collect and process your personal data and tell you about your privacy rights and how the law protects you.

1. Important Information and Who We Are

1.1. Purpose Of This Privacy Notice

This privacy notice aims to give you information on how Keamore Limited collects and processes your personal data through your use of our websites, www.SymTerra.co.uk or www.SymTerra.com (our “website”), or otherwise where we process your data as a controller.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

1.2. Controller

Keamore Limited, a private limited company incorporated and registered in England and Wales with company number 06689064 whose registered office is at New Garth House, Upper Garth Gardens, Guisborough TS14 6HA, is the controller and responsible for your personal data (collectively referred to as “Keamore”, “SymTerra”, “we”, “us” or “our” in this privacy notice).

We have appointed a data protection team who are responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Data Protection Team using the details set out below:

Data Protection Team, Keamore Limited, New Garth House, Upper Garth Gardens, Guisborough, United Kingdom, TS14 6HA

Email address: dataprotection@SymTerra.co.uk

You have the right to make a complaint at any time to the Information Commissioner's Office (“ICO”), the UK regulator 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. Changes To The Privacy Notice And Your Duty To Inform Us Of Changes

We keep our privacy notice under regular review. This version was last updated on September 2022.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

1.4. Third-Party Links

The SymTerra 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 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.

2. The Data We Collect About You

2.1 Type and purpose

Personal data, or personal information, means any information about an 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 follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, title, date of birth and gender
 - **Contact Data** includes billing address, delivery address, email address and telephone numbers.
 - **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.
- **Financial Data** includes bank account and payment card details.
- **Technical Data** includes internet protocol (IP) 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 the SymTerra website.

- **Profile Data** includes your username and password (the passwords are stored as hashed values and cannot be read by Keamore), purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website and services such as messages sent, pages visited, buttons clicked and settings updated (in respect of current user logs for persons whom have an authorised user account with us).
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific feature. 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 notice.

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. If You Fail To Provide Personal Data

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 perform the contract we have or are trying to enter with you (for example, to provide you with our services). In this case, we may have to cancel the provision of services to you, but we will notify you if this is the case at the time.

3. How Is Your Personal Data Collected

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

- **Direct interactions.** You may give us your Identity Data, Contact Data, Financial Data, Profile Data, Marketing and Communications Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- create a user account on our website to access and use the services we offer via our software platform;
 - provide us with information in order to allow us to provide you with our services or otherwise fulfil our obligations pursuant to any contract we have with you;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us any feedback.
- **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 personal data by using cookies, server logs and other similar technologies. Please see below for further details.
 - **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources including but not limited to:
 - Technical Data from the following parties:
 - analytics providers such as Google;
 - advertising networks; and
 - search information providers;
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services;
 - Identity and Contact Data from data brokers or aggregators; and
 - Identity and Contact Data from publicly available sources.

4. 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 perform the contract, we are about to enter into or have entered into with you;
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and
- where we need to comply with a legal or regulatory obligation.

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 via the means set out in paragraph 1.2 above .

4.1. Purposes For Which We Will Use Your Personal Data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

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. Please contact Keamore, via the means set out in paragraph 1.2 above, if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new subscriber	(a) Identity Data (b) Contact Data	(a) Performance of a contract with you
To provide you with our services	(a) Identity Data (b) Contact Data (c) Transaction Data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (in order to provide you with our services)
<p>To manage our relationship with you including:</p> <p>(a) notifying you about proposed changes to this privacy notice; and</p> <p>(b) asking you to leave a review of our services or take a survey</p>	(a) Identity Data (b) Contact Data (c) Marketing and Communications Data (d) Profile Data	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated, to ascertain how our subscribers use our services and to develop our services and grow our business)
To administer and protect our business and our website and software (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity Data (b) Contact Data (c) Technical Data (d) Usage Data	(a) Necessary for our legitimate interests (for running our business, developing insights about user activity on the website and software platform, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To use data analytics to improve our	(a) Technical Data (b) Usage Data	Necessary for our legitimate interests (to define types of customers for our

website, software platform, services, marketing, customer relationships and experiences	(c) Marketing and Communications Data	services, to keep our website and software platform updated and relevant, to develop our business, to inform our marketing strategy, to help improve the usability, functionality & reliability of the website and software platform)
To enable you to partake in a promotion, prize draw, competition or complete a survey	(a) Identity Data (b) Contact Data (c) Technical Data (d) Usage Data (e) Profile Data (f) Marketing and Communications Data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to develop our services and grow our business) (c) Necessary to comply with a legal obligation
To make suggestions and recommendations to you about services that may be of interest to you (including those of third parties)	(a) Identity Data (b) Contact Data (c) Technical Data (d) Usage Data (e) Profile Data (f) Marketing and Communications Data	(a) Necessary for our legitimate interests (to develop our services and grow our business) (b) You have provided your explicit consent

4.2. Marketing

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

4.3. 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 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.

4.4. Third-Party Marketing

We will not we share your personal data with any third party for marketing purposes without your express opt-in consent.

4.5. Opting Out

You can ask us or third parties to stop sending you marketing messages at any time to adjust your marketing preferences by following the opt-out links on any marketing message sent to you or by contacting the SymTerra team any time via the means set out in paragraph 1.2 above.

4.6. Cookies

We use cookies to distinguish you from other users on our website. This helps us to provide you with a good experience when you use our website and also allows us to improve our website.

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.

We use the following types of cookie on our website:

Analytics cookies that anonymously remember your computer or mobile device when you visit our website. They keep track of browsing patterns and help us to build up a profile of how our customers use the website. Analytics cookies can be either Keamore or third party cookies.

Essential cookies are required to make SymTerra work correctly, such as by remembering your login and session details, remembering your settings preferences and recording the number of pages you view for the purpose of website optimisation.

Functionality cookies are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

Targeting cookies are used to record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

You can find more information about the individual cookies we use and the purposes for which we use them in pages below:

Cookie Title	Purpose	More information
Cookie Name __stripe_mid	Process payments on the website Examples of purposes for which a cookie may be used: This cookies essential for our site to: (a) Estimate our audience size and usage pattern. (c) Speed up your searches. [(d) Recognise you when you return to our website.] Allow you to use our website in a way that makes your browsing experience more convenient. If you register with us or complete our online forms, we will use cookies to remember your details during your current visit, and any future visits provided the cookie was not deleted in the interim.	https://stripe.com/gb/cookie-settings
Squarespace	Process payments on the website Examples of purposes for which a cookie may be used: This cookies essential for our site to: (a) Estimate our audience size and usage pattern. (c) Speed up your searches. [(d) Recognise you when you return to our website.] Allow you to use our website in a way that makes your browsing experience more convenient. If you register with us or complete our online forms, we will use cookies to remember your details during your current visit, and any future visits provided the cookie was not deleted in the interim.	https://support.squarespace.com/hc/en-us/articles/360001264507-The-cookies-Squarespace-uses

We have no access to third party cookies and third party organisations have no access to ours. The third party organisations that place cookies have their own strict privacy policies.

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 the SymTerra website may become inaccessible or not function properly.

4.7. 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 SymTerra via the means set out in paragraph 1.2 above.

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.

5. Disclosures of Your Personal Data

We may have to share your personal data with the parties set out below for the purposes set out in the table above:

- Companies in our corporate group.
- External Third Parties as set out in the Glossary.
- 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.

6. International Transfers

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

- a) The transfer of your personal data to countries that have been deemed, in accordance with applicable data protection laws in the UK, to provide an adequate level of protection for personal data.
- b) Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

7. 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.

8. Data Retention

8.1. 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, tax, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal data can be obtained by contacting us via the means set out in paragraph 1.2 above.

In some circumstances you can ask us to delete your data: see **Request erasure** below for further information

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research, training and/or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your Legal Rights

Under certain circumstances, if you are an individual, you have rights under data protection laws in relation to your personal data as set out below:

- **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 of erasure

for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **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:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - 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.
 - 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. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with 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. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us via the means set out in paragraph 1.2 above

9.1. No Fee Usually Required

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 certain circumstances.

9.2. What We May Need From You

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.

9.3. Time Limit To Respond

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.

10. Glossary

10.1.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

External Third Parties means:

- Service providers acting as data processors who provide us with payment processing, cyber security, IT and system administration services.
- Professional advisers including bankers, solicitors, auditors and insurers who provide us with banking, legal, accounting and insurance services.
- HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product 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. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us via the means set out in paragraph 1.2 above.

Performance of a contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.