



## Privacy Policy

02 June 2021

We are committed to protecting and respecting your privacy. This Privacy Policy explains when and why we collect personal information, how we use it, the conditions under which we may disclose it to others and how we keep it secure. Please read this Privacy Policy carefully and ensure that you fully understand it. Your acceptance of our Privacy Policy is deemed to occur upon your first use of our site. If you do not accept and agree with this Privacy Policy, you should stop using our site immediately

## 1 Who are we?

We are PassFort Limited and trade under the name of PassFort. We are a provider of SaaS solutions delivering compliance automation to the business to business market.

PassFort are a UK Company CRN: **09565115**

Our data protection registration number is **ZA126012**

## 2 How can we be contacted?

Our registered address is: **1 Mark Square, London EC2A 4EG.**

Our Data Protection Officer is **Henry Irish, CTO.**

We can be contacted on: [info@passfort.com](mailto:info@passfort.com).

## 3 Where do we collect information about you?

We obtain information about you when you use our website, make enquiries for, or purchase our products or services or information that is gathered from publicly available sources such as websites or LinkedIn. Additionally, we source personalised information directly from list owners who offer GDPR (General Data Protection Regulation) compliant data on decision makers in companies we would like to approach in order to promote our products and services.

## 4 Which data subjects do we collect personal information on?

Customers, enquirers, prospects, suppliers, contractors, agents & consultants, attendees & registrants to both physical and online events, job applicants, current & past employees

## 5 What type of information is collected from you or about you?

The information we collect might include your gender, name, date of birth, job title, profession, company name and address, telephone number, corporate email address , IP address, web browser and version, operating system, a list of URLs starting with the referring site, your activity on our

site and the site you exit to as well as other information specific to the nature of our interaction such as business interests and preferences. We do not collect or process any sensitive personal information or special categories of data.

## **6 What is the legal basis for retaining this information?**

PassFort has a legitimate interest in retaining and processing personal data relating to enquirers and prospects who have a potential need for our products and services subject to communications being of a professionally relevant nature. PassFort has completed a Legitimate Interests Assessment where we have balanced the needs of PassFort with the rights and fundamental freedoms of the data subjects. A copy of our Legitimate Interests Assessment is available on request. In some instances we use consent as a legal basis for using/processing and storing personal information for example when a data subject opts-in to a marketing communication through a check box on a web form. In instances where the data subject is an active customer, supplier, consultant, agent or contractor, then the lawful basis for processing would be for the performance of a contract or agreement. In all instances, data subjects are given the ability to opt-out from our communications at any point in time via an easy to use unsubscribe process. Additionally, data subjects can opt-out by sending an email to [info@passfort.com](mailto:info@passfort.com).

## **7 How is your information used?**

All personal data is processed and stored securely, for no longer than is necessary in light of the reasons for which it was first collected. We will comply with our obligations and safeguard your rights under the GDPR. We may use your personal information to:

- Process an enquiry or request a quotation;
- Process an order for our products or services;
- Conduct market research;
- Carry out our obligations arising from any agreements or licenses entered into
- Seek your views or comments on the services we provide;
- Notify you of changes to our services;
- Providing and managing your account;
- Providing and managing your access to our site;
- Personalising and tailoring your experience on our site;
- Personalising and tailoring our products and services for you;
- Analysing your use of our site and gathering feedback to enable us to continually improve our site and your user experience;
- Send you professional business to business communications that based on your company's business activity and your role within the business, may be of interest. This may include profiling and automated decision making to improve your experience.

## 8 How long do we retain your personalised information?

We are legally required to hold some types of information to fulfil our statutory obligations. We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us. We will comply with our obligations as a Data Controller and safe guard your rights under GDPR and the Privacy and Electronic Communication (EC Directive) Regulations 2003. We will keep customer information for a period of 6 years from contract end date and prospect data for a period of 2 years.

## 9 Who has access to your information?

We will not sell, rent or exchange personal information to third parties for their own marketing purposes. The only time that personal information of this nature will be provided to a third party is as follows:

- When we are required to do so by law, for example, by a Court Order or for the purposes of prevention of fraud or other crime or to another authorised governmental body
- When we employ the services of a third party to conduct specific work on PassFort's behalf. Examples of this would include; services required to fulfil a mailing, telemarketing or email marketing campaign on our behalf, advertising, search engine and payment processing. Please however be aware that when we use third party service providers, we disclose only the personal information that is necessary for them to deliver the service and we have an agreement in place that requires them to keep your information safe and secure to the standards set out under GDPR.
- 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 re-organisation. In instances such as this, the acquiring company would be permitted to use your personal data only for the same purposes for which it was originally collected by PassFort.
- If we are under a duty to disclose or share your personal data in order to comply with or enforce any terms of business
- In some cases, certain companies may require access to some or all of your personal information e.g. prospective investors, affiliates and partners. Where any of your personal information is required, we will take all reasonable steps to ensure that your data will be handled safely, securely and in accordance with your rights, our obligations and the obligations of the third party

## 10 Where do we process & store data?

We are regulated by the Information Commissioner and are registered as data controllers on the Data Protection Register (number ZA126012.) Data Protection laws in the EU and the UK stipulate that personal data must be fairly and lawfully processed, used only for the intended purpose, is adequate, relevant and not excessive, is accurate and up to date, is not kept longer than is neces-

sary, is processed in line with the rights of the individual, is held securely, and is not transferred to other countries without adequate protection. When the foregoing or other laws and regulations require that we observe privacy restrictions beyond those specifically stated in this Privacy and Cookie Policy, we undertake our activities in conformance with their requirements and, if the privacy restrictions conflict in any way with these provisions, we abide by the stricter requirements of the relevant laws, rules and regulations. Some or all of your data may be stored outside of the European Economic Area (EEA). You are deemed to accept and agree to this by using our site and submitting information to us. If we do store data outside the EEA, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the EEA and under the GDPR. Such a transfer will not occur without adequate protection. PassFort shall only process (including store) personal information in accordance with applicable European and UK privacy laws. We do not participate in, or presently co-operate with, any kind of blanket surveillance or monitoring.

## 11 How do we secure your data?

Please be aware that the transmission of information via the internet is not completely secure. We are unable to guarantee the security of your personal data during transmission to PassFort. Any transmission is therefore undertaken at your own risk. Once we have received your personal information, we will apply strict technical and organisational security procedures so as to prevent unauthorised access, use, disclosure, accidental loss, deletion or alteration of any kind. Any transmission of personal information from PassFort to a third party will be via industry standard file encryption. We employ state of the art firewall technology, and all data generated in PassFort is fully encrypted at rest and in transit using 256-bit SSL encryption, and continuously backed up in several high security data centres in different locations.

## 12 Your choices & rights as a data subject

You have a choice about whether or not you wish to receive information from us. If you do not want to receive direct marketing communications from us, then please advise us immediately by post, email or telephone or simply unsubscribe using the link in our emails or via our [Preference Page](#). You will then be suppressed immediately from any future communications based on your specific preferences. Please however be aware that PassFort will still need to retain basic information concerning the suppression so as to ensure that the data subject is not sourced via alternative means and then accidentally added back into our database. You have the right to; be informed about our collection and use of personal information, the rectification of personal information where the data is inaccurate or incomplete, and the right to object to PassFort using the personal information for a particular purpose.

## 13 How you can access and update your information

The accuracy of your information is important to us. You can request copies of the information we hold on you at any time (Subject Access Request or SAR) via post, email or telephone. You have the right to request that this information be amended/corrected if you so desire. We have an obligation to respond to all Subject Access Requests within 28 days from initial receipt although we will do our utmost to respond in a more timely fashion.

## 14 Use of "Cookies"

The PassFort website uses both first party and third party Cookies to keep track of your activity and to enhance your experience. A Cookie is a small text file that's stored on your computer or mobile device when you visit a website. First party cookies are placed directly by PassFort and only used by PassFort. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

We and our partners store or access Cookies for four purposes:

1. Precise geolocation data, and identification through device scanning
2. Personalised ads and content, ad and content measurement, audience insights and product development,
3. Store and/or access information on a device
4. Special Purposes and features.

You may click to consent to any of these four options for PassFort and our partners' to process for such purposes. Alternatively, you may click to refuse to consent, or access more detailed information and change your preferences before consenting. Your preferences will apply to this website only. Please note that some processing of your personal data may not require your consent, but you have a right to object to such processing. You can change your preferences at any time by visiting [www.passfort.com](http://www.passfort.com) and clicking on the change consent icon in the bottom right hand corner of the page.

Before Cookies are placed on your computer/device, you will be shown a pop-up prompt requesting your consent to set those Cookies. By giving your consent to placing these Cookies you are enabling us to provide the best possible experience and service to you. You may if you wish, decline consent to these Cookies. However, certain features of our site will not function fully or as intended. You will be given the opportunity to allow only first party Cookies and block third party Cookies..

Third party Cookies are placed by websites, services and/or parties other than PassFort. Third party Cookies are not integral to the functioning of our website and your use and experience of our site will not be impaired by refusing consent to them.

For existing customers we also use Cookies to save your login email, and if you choose, to save other personal information so you do not have to re-enter it each time you visit the site. In order to access or change any of your private information, you must log in with your password even if your

computer contains your persistent Cookie. Additionally, if you log out of the site you will need to re-enter your password the next time you visit in order to log in to your account.

First party Cookies include::

- **\_ga (Google Analytics):**
  - This cookie is installed by Google Analytics. The cookie is used to calculate visitor, session, campaign data and keep track of site usage for the site's analytics report. The cookies store information anonymously and assign a randomly generated number to identify unique visitors.
  - Not necessary
- **\_gid (Google Analytics):**
  - This cookie is installed by Google Analytics. The cookie is used to store information of how visitors use a website and helps in creating an analytics report of how the website is doing. The data collected includes the number of visitors, the source where they have come from, and the pages visited in an anonymous form.
  - Not necessary
- **Pardot:**
  - These cookies are set to evaluate visitor activity across forms, landing pages & other assets visited during a website session.
  - Not necessary

Our site uses analytics services provided by Google & Pardot. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how our site is used. This in turn, enables us to improve our site and the products/services offered through it.

Third Party Cookies include:

- YouTube 1
  - Used to track the information of the embedded YouTube videos on a website.
- YouTube 2
  - This cookie is set by Youtube and is used to track the views of embedded videos.
- Google DoubleClick
  - Used by Google DoubleClick and stores information about how the user uses the website and any other advertisement before visiting the website. This is used to present users with ads that are relevant to them according to the user profile.

## 15 Data Protection Policy

A copy of our Data Protection Policy is freely available - please feel free to request a copy of this document by emailing [info@passfort.com](mailto:info@passfort.com).

## **16 Right to complain**

If you are unhappy with anything concerning our collection, processing, transfer, storage or disposal of your personal data and we have been unable to resolve the problem for you, you have the right to lodge a complaint with the Information Commissioner's Office ([www.ico.org.uk](http://www.ico.org.uk))

## **17 Links to other websites**

Our website may contain links to other websites run by other organisations which are outside our control. The 'Terms of Use' applies to [www.PassFort.com](http://www.PassFort.com) only, we encourage you to read the respective Privacy Policies and Terms of Use statements on the other websites you visit. We cannot be held responsible for the policies and practices of other sites even if you access them using links from the PassFort website.

## **18 Review of this Policy**

We reserve the right to change this Policy without notice so please check this page to ensure that you're happy with any changes that may have been implemented.