

OUR PRIVACY POLICY

Ochresoft Technologies Limited (“we”, “us” or “our”) is a company incorporated in England and Wales with company number 03645549. Our registered office is 5-7 Abbey Court, Eagle Way, Sowton Industrial Estate, Exeter, EX2 7H.

We are committed to preserving your privacy. This policy 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 our website at <https://www.ochresoft.com>
- sale and provision of our products and services;
- any of our 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 Ochresoft Technologies Limited of 7 Abbey Court, Eagle Way, Sowton Industrial Estate, Exeter, EX2 7H. We are registered as a data controller with the Information Commissioner's Office under number Z8767401.

1 BASIS FOR PROCESSING PERSONAL DATA

1.1 Paragraphs 1.2 – 1.7 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 products and / or services to you, we will process your personal data to provide these products and / or services to you. 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, data providers, cloud based email and CRM system providers, marketing and public relations agencies and any third-party provider of services to whom you instruct us to provide personal data to on your behalf. 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 To make our website better:

We may also process personal data in order to provide you with a more tailored experience, including using personal data to make sure our website 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 website (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 website.

We will also process personal data for the purposes of making our website more secure, and to administer our website 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 [Legal Notices](#).

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 website 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 their internet browser. If you enable such do not track functionality, our website may be less tailored to your needs and preferences.

1.5 **For marketing purposes:**

1.5.1 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.

1.5.2 You can ask us to stop sending you marketing communications at any time by contacting us at 01793 836 730 or enquiries@ochresoft.com 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.

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

1.6.1 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

1.6.2 if Ochresoft Technologies Limited or substantially all of its assets are acquired by a third party, in which case personal data held by Ochresoft Technologies 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.

- 1.7 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.

2 CATEGORIES OF INFORMATION WE COLLECT FROM YOU

We will collect and process the following personal data:

- 2.1 **Information you give us:** This is information about you that you give us when you visit, register or order products and / or services on our website 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, participate in social media functions on our website, enter a promotion or event, complete a survey and/or when you report a problem with our website. The information you give us may include names, addresses, email addresses and phone numbers.
- 2.2 **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 one of your customers who require one of our products or services or whose data is processed via our products and services (such as our workflow software), we need to process such personal data in order to provide these products and / or services to the other person or people. This personal data may also include data concerning health for example; where we process information about mental capacity in our Power of Attorney or wills workflow software. 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.
- 2.3 **Information we collect:** With regard to visits to our website we will automatically collect the following information:
- 2.3.1 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
- 2.3.2 information about visits, including the full Uniform Resource Locators (URL), clickstream to, through and from our website (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.
- 2.4 **Information we receive from other sources:** We are also working closely with third parties (including, for example, business partners, sub-contractors, advertising networks, analytics providers, event coordinators, hosting providers and search information providers) from whom we may also receive information about you.
- 2.5 We do **not** process any special categories of personal data, meaning personal data revealing:
- 2.5.1 racial or ethnic origin;
- 2.5.2 political opinions;

- 2.5.3 religious or philosophical beliefs;
 - 2.5.4 trade union membership;
 - 2.5.5 genetic or biometric data that uniquely identifies individuals; or
 - 2.5.6 data concerning an individual's sex life or sexual orientation.
- 2.6 We do not process data relating to criminal convictions unless legally obliged to do so.

3 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 out above (depending on the types of information we receive).

4 WHERE WE STORE PERSONAL DATA

- 4.1 The data that we collect from you will be stored in (and will not be transferred out of) the European Economic Area.
- 4.2 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 website, you are responsible for keeping this password confidential. You must not share your password with anyone.

5 PERIOD OF STORAGE

- 5.1 Where you purchase products from us, we will retain your data for as long as you have an active subscription with us and after expiration or cessation of that subscription, for the period which you instruct us to retain it for, to ensure that we comply with our contractual obligations to you, and 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.
- 5.2 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.

6 RIGHTS UNDER DATA PROTECTION LAWS

Right to object

- 6.1 You have the right to object to us processing your personal data where we are processing your personal data:
 - 6.1.1 based on our legitimate interests (as set out at sections 1.3, 1.4 and 1.6 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
 - 6.1.2 for direct marketing purposes. If you ask us to stop processing your personal

data on this basis, we will stop.

Right of access

- 6.2 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.
- 6.3 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

- 6.4 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

- 6.5 You have the right to restrict our processing of your personal data where:
- 6.5.1 the accuracy of the personal data is being contested by you;
 - 6.5.2 the processing by us of your personal data is unlawful, but you do not want the relevant personal data erased;
 - 6.5.3 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
 - 6.5.4 we are processing your data on the basis of our legitimate interest (as set out at sections 1.3, 1.4 and 1.6 above) and you:
 - 6.5.4.1 object to our processing on the basis of our legitimate interest under section 6.1.1 above; and
 - 6.5.4.2 want processing of the relevant personal data to be restricted until it can be determined whether our legitimate interest overrides your legitimate interest.
- 6.6 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 and, in addition, for storage purposes and for the purpose of legal claims.

Right to data portability

- 6.7 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

- 6.8 You have the right to require we erase your personal data which we are processing

where one of the following grounds applies:

- 6.8.1 the processing is no longer necessary in relation to the purposes for which your personal data was collected or otherwise processed;
 - 6.8.2 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;
 - 6.8.3 you object to the processing in as set out in section 6.1.1 of this policy and we have no overriding legitimate interest for our processing;
 - 6.8.4 the personal data have been unlawfully processed; and
 - 6.8.5 the erasure is required for compliance with a law to which we are subject.
- 6.9 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.

Exercising rights

- 6.10 You can exercise such rights by contacting us on 01793 836 730 or by writing to us at enquiries@ochresoft.com.

7 LINKS ON OUR WEBSITE

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

8 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.

9 CONTACT

Questions, comments and requests regarding this privacy policy are welcomed. You can contact us by telephone at 01793 836 730 or by writing to us at enquiries@ochresoft.com.

This privacy policy was last updated on 24/05/2018.