

# Privacy Policy

## Welcome to Footprint Solutions

We are Footprint Solutions Limited (Company Number **5753667**). We pride ourselves on how seriously we take the privacy of others and we are committed to protecting the privacy and security of personal data. So, whether you are using one of our websites (our **Sites** – as defined below), purchasing some software (a **Desktop Application**) or receiving our Consultancy Services (**Services**) you can rest assured that your information will be properly managed and protected by us.

- [www.footprint-solutions.co.uk](http://www.footprint-solutions.co.uk)
- [www.e-redact.co.uk](http://www.e-redact.co.uk)
- [www.iformpro.co.uk](http://www.iformpro.co.uk)

Buying Software or Services from us should be a straightforward and pleasant process, and we want to make sure we protect your privacy along the way. So do take a few minutes to read this Privacy Policy; it explains what we do with your data, how we collect and use your browsing information and how we may use it for future marketing purposes, in a safe, secure and compliant way.

## Introduction

- This Privacy Policy is to inform you of our policy about all information that we record about you. It sets out the terms under which we may process any information that we collect from you, or that you provide to us.
- We take seriously the protection of your privacy and confidentiality. We understand that all visitors to our Site are entitled to know that their personal data will not be used for any purpose unintended by them, and will not accidentally fall into the hands of a third party.
- We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.
- This Privacy Policy complies with English law accordingly implemented, including that required by the General Data Protection Regulation (GDPR).
- The law requires us to tell you about your rights and our obligations to you in regards to the processing and control of your personal data. We do this now, by requesting that you read the information provided at [knowyourprivacyrights.org](http://knowyourprivacyrights.org)
- Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our Site.

## 1 Important information

1.1 **Software Terms** - This Privacy Policy supplements the other notices and terms published on our Site and is not intended to override them, including our Software Terms (the **Software Terms**).

1.2 **Controller** - In most cases, we are the data controller and responsible for the personal data collected from you when you register for an account with us to purchase some software. We are not a processor of data (personal or otherwise) when purchasing a Software Application from us.

### 1.3 Understanding

- 1.3.1 To assist you further in understanding this Privacy Policy, we have set out in the Schedule a glossary of terms used in this Privacy Policy, examples of types of personal data we collect, how we use it, the lawful basis for processing such data and further details of your rights.

- 1.4 **Questions** - We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this Privacy Policy. You can ask for further information about the use of your personal information or if you need to raise a complaint, by contacting the DPO with the details listed below:
- 1.4.1 **By Post:** Data Protection Officer, Footprint Solutions Limited, Mallory House, Goostrey Way, Knutsford, Cheshire, WA16 7GY
  - 1.4.2 **By Email:** [dataprocessing@footprint-solutions.co.uk](mailto:dataprocessing@footprint-solutions.co.uk)
- 1.5 **Complaints** - You have the right to make a complaint at any time to the ICO ([www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.
- 1.6 **Who can use our Site** – Our Site is intended for business use only.
- 1.7 **Changes to this Privacy Policy** - We may change this Privacy Policy from time to time by updating this page. Please check it regularly to ensure you are aware of any changes. This Privacy Policy was created in August 2021.
- 1.8 **Third-party links** - Our Site may include links to third-party websites, plug-ins and applications. By clicking on these links or enabling connections you may be allowing third parties to collect or share your personal data. We have no control over these third-party websites, plug-ins or applications and are not responsible for their privacy notices, therefore you should read their privacy notices to understand what personal data they collect about you and how they use it.

## 2 The data we collect about you

- 2.1 We may collect, use, store and transfer the types of personal data about you listed in Part 1 of the Schedule.
- 2.2 We also collect, use and share aggregated data. However, if we combine aggregated data with your personal data so that it can directly or indirectly identify you, we treat this as your personal data.
- 2.3 We do not collect any special categories of personal data or any information about criminal convictions and offences.
- 2.4 **Failure to provide personal data** - If we are required by law, or under the terms of a contract we have with you, to collect your personal data, for example when you request a Report, and you fail to provide it:
- 2.4.1 we may not be able to enter into or perform the contract with you; and/or
  - 2.4.2 we may have to cancel the Services and/or the contract (as applicable).

We will notify you of this at the relevant time.

## 3 Your consent to the Services

- 3.1 When you request Software or Services from us, we will email you to confirm receipt of your request.
- When we register Software on your behalf, this software will be registered to the Email Address (and in some cases Full User Name). Please note that should you contact us with a query or enquiry, we may need to contact you at the registered email address in order to assist you further.
- 3.2 You may purchase Software or Services on the behalf of another individual, and (to enable us to contact them) you must provide their name and email address whilst registering the user of the Software or Services. By purchasing Software or Services on the behalf of another individual and providing their full name and email address, you confirm and warrant to us that you have obtained the relevant individual's explicit consent to be contacted by us in respect of the Software or Services purchased.

## 4 How personal data is collected

We collect personal data in the following ways:

<b>Direct interactions</b>	You may provide personal data when you complete our online enquiry form, request Software and / or the Services from our Site, enquire with us in respect of a job opportunity, or otherwise correspond with us (by post, phone or email).
<b>Indirect interactions</b>	When someone purchases Software or Services from us on behalf of a third-party. In such circumstances, your personal data will be collated from the information supplied by that third-party and will be used in order to register the aforementioned Software / Services on your behalf.
<b>Automated technology</b>	We automatically collect personal data (technical and usage) when you browse or interact with our Site, by using cookies, server logs and other similar technologies. We may also receive technical data about you if you visit other websites which use our cookies. Please see our Cookies Policy <a href="https://www.footprint-solutions.co.uk/cookie-notice/">https://www.footprint-solutions.co.uk/cookie-notice/</a> for further details.
<b>Publicly available sources</b>	We do not collect personal data from any publicly available sources such as credit reference agencies, based inside the UK.
<b>Third parties</b>	We may receive personal data from Business Partners / Associated Businesses on your behalf to allow us to register Software and / or Services on your behalf.

## 5 How we use your personal data

5.1 We will only use your personal data when the law allows us to. Most commonly, we will use your personal data:

- 5.1.1 to perform the contract, we are to enter into, or have entered into with you for the supply of the Software and / or Services;
- 5.1.2 to comply with a legal obligation; or
- 5.1.3 where it is necessary to carry out our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

5.2 Part 2 of the Schedule sets out the lawful basis we will rely on to process your personal data.

5.3 Please 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 information.

5.4 **Marketing** - You will only receive marketing communications from us, if you have:

- 5.4.1 purchased Software or Services from us; or
- 5.4.2 you have provided your information during a Software or Service enquiry and as such, you consent to receive marketing communications from us;
- 5.4.3 All marketing will cease if you opt out of receiving marketing communications, unsubscribe from a mailing list or withdrawn your consent for us to contact you via post, email or telephone.

5.5 We will not share your personal data with third parties for their marketing purposes.

5.6 **How to opt out** - You can opt out of email marketing by clicking the unsubscribe button within the particular marketing email. You can also withdraw your consent to receive marketing communications and asked to be removed from our mailing list at any time by contacting us via post, email or telephone.

- 5.7 Even if you opt out of receiving marketing communications, we may still use your personal data for other purposes provided we have a lawful basis to do so.
- 5.8 **Change of purpose** - We will only use your personal data for the purpose that we originally collected it for, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose or we have a lawful basis to change the purpose.
- 5.9 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 use your personal data in this manner.
- 5.10 We may process your personal data (without your knowledge or consent) where this is required or permitted by law.

## **6 Disclosure of your personal data**

We may share your personal data with the Third Parties set out in Part 4 of the Schedule. We require all Third Parties to respect the security of your personal data and to treat it in accordance with the law. Such Third Parties can only process your personal data for specified purposes and in accordance with our instructions.

## **7 International transfers**

- 7.1 We do not transfer your personal data outside of the UK.

## **8 Data security**

- 8.1 We operate appropriate security measures to prevent personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Access to personal data is restricted to individuals who have a business need to know it, are under confidentiality obligations and can only process it on our instructions.
- 8.2 We have procedures in place 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.
- 8.3 We will use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us. Whenever your data is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

## **9 Data retention**

- 9.1 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, accounting, or reporting requirements.
- 9.2 We may update our data retention practices from time to time and you can request details by contacting us. However, we are legally required to keep basic information about our customers (including contact, identity, financial and transaction data) for six years after the end of the tax year in which they cease being customers, for tax purposes.
- 9.3 We may also anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes. We can use anonymised information indefinitely without further notice to you.

## **10 Your legal rights**

- 10.1 Your legal rights in relation to your personal data are set out in full in Part 3 of the Schedule. If you wish to exercise any of your rights, please contact us.

- 10.2 You will not have to pay a fee to exercise any of your rights unless your request is clearly unfounded, repetitive or excessive. In which case, we may charge a reasonable fee for this information or refuse to comply with your request.
- 10.3 We may ask you to provide further information to help us confirm your identity. This is a security measure to ensure that personal data is not disclosed to any person who does not have the right to receive it.
- 10.4 We aim to respond to all legitimate requests within one month. If your request is particularly complex or you have made a number of requests it may take us longer to respond. In this case, we will notify you and keep you updated.

## Schedule

### Part 1 Types of personal data

<b>Contact data</b>	Billing address, delivery address, email address and telephone number.
<b>User data</b>	Full name and registered email address of the service / software user
<b>Financial data</b>	Bank account and payment card details.
<b>Identity data</b>	First name, last name, username or similar identifier.
<b>Marketing and communication data</b>	Your preferences in receiving marketing from us.
<b>Technical data</b>	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 our Site.
<b>Transaction data</b>	Details about payments to and from you and other details of the Services you have purchased from us.

### Part 2 Lawful basis for processing and processing activities

The lawful basis upon which we may rely on to process your personal data are:

<b>Consent</b>	You have given your express consent for us to process your personal data for a specific purpose, for example, when you click the "Submit" button before requesting a Demo, Marketing Call-Back or Terms for a Software or Service.
<b>Contract</b>	The processing is necessary for us to perform our contractual obligations with you under our contract, or because you have asked us to take specific steps before entering into a contract with you.
<b>Legal obligation</b>	The processing is necessary for us to comply with legal or regulatory obligation.
<b>Legitimate interests</b>	The processing is necessary for our or a third party's legitimate interest e.g. in order for us to provide the best service to you via our Site. Before we process your personal data on this basis, we make sure we consider and balance any potential impact on you, and we will not use your personal data on this basis where such impact outweighs our interest.

Set out below are specific details of the processing activities we undertake with your personal data and the lawful basis for doing this.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing</b>
To register your Account.	Identity & contact	To perform our contract with you.
To process and deliver your order for a Report, manage payments, fees and charges and debt recovery.	Identity, contact, financial, transaction, marketing & communications	(i) To perform our contract with you; (ii) As necessary for our legitimate interest in recovering debts due to us.
To manage our relationship with you and notify you of changes to our Terms or Privacy Policy.	Identity, contact, profile, marketing & communications	(i) To perform our contract with you; (ii) As necessary to comply with a legal obligation; (iii) As necessary for our legitimate interests in keeping our records updated and analysing how customers use the Reports and/or the Services.
To administer and protect our business and this Site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	Identity, contact & technical	(i) As necessary for our legitimate interests in running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise; (ii) As necessary to comply with any legal obligations.
To deliver relevant website content/advertisements to you and measure or understand the effectiveness of our advertising.	Identity, contact, profile, usage, marketing, communications & technical	As necessary for our legitimate interests in studying how customers use the Reports and/or the Services, to develop them, to grow our business and to inform our marketing strategy.
To use data analytics to improve our Site, Reports, the Services, marketing, customer relationships and experiences.	Technical & usage	As necessary for our legitimate interests to define types of customers for the Reports and/or the Services, to keep our Site updated and relevant, to develop our business and to inform our marketing strategy.

### Part 3 Your legal rights

You have the following legal rights in relation to your personal data:

<b>Access your data</b>	You can ask for access to and a copy of your personal data and can check we are lawfully processing it.
<b>Correction</b>	You can ask us to correct any incomplete or inaccurate personal data we hold about you.
<b>Erasure</b>	<p>You can ask us to delete or remove your personal data where:</p> <ul style="list-style-type: none"> <li>(a) there is no good reason for us continuing to process it;</li> <li>(b) you have successfully exercised your right to object (see below);</li> <li>(c) we may have processed your information unlawfully; or</li> <li>(d) we are required to erase your personal data to comply with local law.</li> </ul> <p>We may not always be able to comply with your request for specific legal reasons, which will be notified to you at the time of your request.</p>
<b>Object</b>	<p>You can object to the processing of your personal data where:</p> <ul style="list-style-type: none"> <li>(a) we are relying on our legitimate interest (or those of a third party) as the basis for processing your personal data, if you feel it impacts on your fundamental rights and freedoms;</li> <li>(b) we are processing your personal data for direct marketing purposes.</li> </ul> <p>In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms and in such circumstances, we can continue to process your personal data for such purposes.</p>
<b>Restrict processing</b>	<p>You can ask us to suspend or restrict the processing of your personal data, if:</p> <ul style="list-style-type: none"> <li>(a) you want us to establish the accuracy of your personal data;</li> <li>(b) our use of your personal data is unlawful, but you do not want us to erase it;</li> <li>(c) you need us to hold your personal data (where we no longer require it) as you need it to establish, exercise or defend legal claims; or</li> <li>(d) you have objected to our use of your personal data, but we need to verify whether we have overriding legitimate grounds to use it.</li> </ul>
<b>Request a transfer</b>	You can request a transfer of your personal data which is held in an automated manner and which you provided your consent for us to process such personal data or which we need to process to perform our contract with you, to you or a third party. We will provide your personal data in a structured, commonly used, machine-readable format.
<b>Withdraw your consent</b>	You can withdraw your consent at any time (where we are relying on consent to process your personal data). This does not affect the lawfulness of any processing carried out before you withdraw your consent.

#### Part 4 Third Parties

<b>Service providers</b>	Acting as processors who provide IT and system administration services.
<b>Payment Gateway Providers</b>	Acting as controller who require information to collect and process payments on our behalf for the Services ordered via the Site, your Account, or any email link we may send to you from time to time, or to issue refunds being:  a) Stripe Inc, a US registered company whose registered office is located at 510 Townsend Street San Francisco, CA 94103 United States.
<b>Professional advisors</b>	Acting as processors or controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
<b>HM Revenue &amp; Customs, regulators and other authorities</b>	Acting as processors or controllers who require reporting of processing activities in certain circumstances.
<b>Other third parties</b>	Such third parties 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.

## Part 5 Glossary

<b>Aggregated data</b>	Information such as statistical or demographic data which may be derived from personal data but which cannot by itself identify a data subject.
<b>Controller</b>	A body that determines the purposes and means of processing personal data.
<b>Data subject</b>	An individual living person identified by personal data (which will generally be you).
<b>Personal data</b>	Information identifying a data subject from that data alone or with other data we may hold but it does not include anonymised or aggregated data.
<b>Processor</b>	A body that is responsible for processing personal data on behalf of a controller.
<b>Special categories of personal data</b>	Information about race, ethnicity, political opinions, religious or philosophical beliefs, trade union membership, health, genetic, biometric data, sex life and sexual orientation.
<b>ICO</b>	Information Commissioner's Office, the UK supervisory authority for data protection issues.