

# Privacy Policy



## BACKGROUND:

Viable Data understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, [www.viabledata.co.uk](http://www.viabledata.co.uk) ("Our Site") and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is requested upon entering the site.

## 1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

<b>"Account"</b>	means an account required to access and/or use certain areas and features of Our Site;
<b>"Cookie"</b>	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in Part 12, below; and
<b>"Cookie Law"</b>	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;

## 2. Information About Us

Our Site is owned and operated by Viable Data, a limited company registered in England under company number 08244724.

Registered address: Prama House, 267 Banbury Road, Summertown, Oxford, UK, OX2 7HQ.

VAT number: GB151056640.

Data Protection Officer: Tom Fitzherbert.

Email address: website@viabledata.co.uk.

Postal address: OX2 7HT.

### 3. **What Does This Policy Cover?**

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

### 4. **What Data Do You Collect and How?**

Depending upon your use of Our Site, we may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. Please also see Part 12 for more information about our use of Cookies and similar technologies. We do not collect any 'special category' AND/OR 'sensitive' personal data AND/OR personal data relating to children or data relating to criminal convictions and/or offences.

- Identity Data: This includes your first name, maiden name, last name, username (or similar identifier), marital status, title, date of birth, and gender.
- Contact Data: This includes your billing and delivery addresses, email address, and telephone numbers.
- Technical Data: This includes your internet protocol (IP) address, 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.
- Profile Data: This includes your username and password, interests, preferences, feedback, and survey responses.
- Usage Data: This includes information about how you use our website, products, and services.
- Marketing and Communications Data: This includes your preferences for receiving marketing from us and our third parties, as well as your communication preferences.

We gather, utilise, and share Aggregated Data, which includes statistical or demographic data, for various purposes. Although Aggregated Data may be generated from your personal data, it does not qualify as personal data under the law because it does not reveal your identity directly or indirectly. To illustrate, we might calculate the percentage of users who access a particular website feature by combining your Usage Data. However, if we merge or link Aggregated Data with your personal data in a way that allows for your direct or indirect identification, we handle the combined data as personal data, and it will be used in accordance with our privacy notice.

We gather information from you in various ways, such as through direct interactions and automated technologies. Direct interactions include filling out forms, corresponding with us by post, phone, email, or other means.

This includes personal data you provide when:

- Applying for our products or services,
- Creating an account on our website
- Subscribing to our services or publications
- Requesting marketing materials, or giving us feedback.

Automated technologies include collecting Technical Data about your equipment, browsing actions, and patterns as you interact with our website. We use cookies, server logs, and similar technologies to collect this personal data. We may also receive Technical Data about you from other websites that use our cookies.

## 5. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how may use your personal data, and our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Manage relationship with you, including notifying you about changes to our terms or privacy policy and asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Fulfilling a contract or agreement with you (b) Meeting a legal obligation (c) Serving our legitimate interests, such as keeping our records up-to-date and analysing customer use of our products/services.
Administer and protect our business and website, including: Troubleshooting, Data analysis, Testing, System maintenance, Support, Reporting, and Hosting of data	(a) Identity (b) Contact (c) Technical	(a) We process your data when it is necessary for our legitimate interests such as running our business, providing administration and IT services, ensuring network security, and in the context of a business reorganization or group restructuring exercise. (b) We also process your data when it is necessary to comply with a legal obligation or for our legitimate interests such as

		studying how customers use our products/services, developing them, growing our business, and informing our marketing strategy.
Deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	(a) We process your data when it is necessary for our legitimate interests such as running our business, providing administration and IT services, ensuring network security, and in the context of a business reorganization or group restructuring exercise. (b) We also process your data when it is necessary to comply with a legal obligation or for our legitimate interests such as studying how customers use our products/services, developing them, growing our business, and informing our marketing strategy.
Use data analytics to improve our website, products/services, marketing, customer relationships, and experiences	(a) Technical (b) Usage	Necessary for our legitimate interest in defining customer types, keeping our website current, developing our business, and informing our marketing strategy.
Make suggestions and recommendations to you about our services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email AND/OR telephone AND/OR text message AND/OR post with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.] We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 13.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

## 6. **How Long Will You Keep My Personal Data?**

We keep your personal data only as long as necessary to fulfil the purposes we collected it for, which includes satisfying any legal or reporting requirements. To determine the appropriate retention period, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure, the purposes for which we process, and applicable legal requirements. Details of retention periods are available in our policy, which you can request a copy of. We're required by law to keep basic customer information for tax or financial reporting purposes for six years after they cease being customers. You can request erasure of your data in some circumstances. We may also anonymize your personal data for research or statistical purposes indefinitely.

## 7. **How and Where Do You Store or Transfer My Personal Data?**

We will only store your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the EU GDPR and/or to equivalent standards by law. Transfers of personal data to the EEA from the UK are permitted without additional safeguards.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so;

## 8. **Do You Share My Personal Data?**

We will not share any of your personal data with any third parties for any purposes, subject to the following exception.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## 9. **How Can I Control My Personal Data?**

9.1 You may wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

## 10. **Can I Withhold Information?**

You may access Our Site without providing any personal data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

You may restrict our use of Cookies. For more information, see Part 12.

## 11. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 13.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it.

Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## 12. **How Do You Use Cookies?**

Our Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve our products and services. 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.

By using Our Site, you may also receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than us. Third-party Cookies are used on Our Site for to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

All Cookies used by and on Our Site are used in accordance with current Cookie Law.

Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.

Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be "strictly necessary". Your consent will not be sought to place these Cookies, but it is still important that you are aware of them.

Our website uses four types of cookies:

- Strictly necessary cookies, which are required for the website to function and allow access to secure areas
- Analytical or performance cookies, which help us understand how visitors use our website and improve its functionality
- Functionality cookies, which allow us to recognise returning visitors and personalise content to their preferences; and
- Targeting cookies, which track website visits, pages viewed, and links clicked to make our website more relevant to your interests.

Our Site uses analytics services provided by Google Analytics. 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 and services offered through it.



The analytics service(s) used by Our Site use(s) Cookies to gather the required information. You do not have to allow us to use these Cookies, however whilst our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable us to continually improve Our Site, making it a better and more useful experience for you.

### 13. **How Do I Contact You?**

To contact **us** about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Tom Fitzherbert):

Email address: [website@viabledata.co.uk](mailto:website@viabledata.co.uk).

Postal Address: OX2 7HT.

### 14. **Changes to this Privacy Policy**

We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on July 2023.