



PIQ GLOBAL LTD

PRIVACY POLICY FOR THE PIQ SUITE PLATFORM

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PiQ Global Ltd (company number 12872883) (collectively referred to as "**PiQ**", "**PiQ Suite**", "**we**", "**us**" or "**our**" in this privacy policy) respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you. This policy explains how we process personal data if you are a visitor or user of the PiQ Suite Platform at www.piqsuite.com (**Platform**).

1. Important information and who we are

Purpose of this privacy policy

- 1.1 This privacy policy aims to give you information on how we collect and process personal data through your use of the Platform, including any personal data you provide or we collect when you register an account for a subscription for the Platform (a "**Subscription**"), purchase a Subscription, customise your dashboard in the Platform, interact with feeds, charts, TV players and any other types of applications that may become available from time to time in the Platform (collectively the "**Applications**"), upload content to the Platform, or contact us in relation to the Platform.
- 1.2 Our Platform is not intended for children (persons under the age of 18) and we do not knowingly collect data relating to children.

Controller

- 1.3 Subject to clause 1.4, we are the data controller and are the person responsible for your personal data.
- 1.4 Where you add an Application to your dashboard in the Platform and that Application is provided and operated by a third party (a "**Third Party Application**"), that third party will be a controller of any personal data we share with that third party to facilitate your use of the Third Party Application and any personal data you upload to the Third Party Application (for example via a chat function). You will be asked to click "accept" to that



third party's terms and conditions and privacy policy relating to the Third Party Application when you choose to add it to your dashboard. We strongly recommend that you read such terms and conditions and privacy policy to understand how that third party will collect and process your personal data. We will be a data processor of such personal data and we will process such personal data in accordance with this privacy policy.

Contact details

- 1.5 If you have any questions about this privacy policy or our privacy practices, please contact us by email at support@piqsuite.com.

Information Commissioner's Office

- 1.6 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.

Changes to the privacy policy and your duty to inform us of changes

- 1.7 We may update this privacy policy from time to time. Every time you wish to use the Platform, please check this privacy policy to understand the terms that apply at that time.
- 1.8 It is important that the personal data we hold about you is accurate and up-to-date. Please keep us informed if your personal data changes during your relationship with us.

Cookies

- 1.9 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. Our Platform uses cookies to distinguish you from other users of the Platform. This helps us to provide you with a good experience when you browse the Platform and also allows us to improve the Platform. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. However, if you disable or refuse cookies, please note that some parts of the Platform may become inaccessible or not function properly. Please see our



Cookies Policy [here](#). for more information about the types of cookies we use and the purposes for which we use them.

Third-party links

- 1.10 The Platform 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 the Platform, we encourage you to read the privacy policy of every website you visit.

2. The data we collect about you

- 2.1 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).

- 2.2 We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

2.2.1 **Identity Data** – data which identifies you, including your name and title.

2.2.2 **Contact Data** – your contact details, including your residential address, billing address, email address and telephone number.

2.2.3 **Account Data** – information we collect when you register and use an account for the Platform, including your username and password, your preferences for receiving notifications, your feedback and survey responses.

2.2.4 **Transaction and Financial Data** – data we collect if you purchase a Subscription via the Platform, including the level of Subscription you have purchased and your chosen payment intervals, your bank account and payment card details, and details of the payments made by you.

2.2.5 **Technical Data** – electronic information which is automatically logged/stored by processing equipment, including 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 Platform.

- 2.2.6 **Usage Data** – information about how you use the Platform, including how you navigate the Platform and customise your dashboard in the Platform. We also collect information about how you respond to our marketing communications, including if you click on any links in our marketing emails.
 - 2.2.7 **Marketing and Communications Data** – information regarding your preferences for receiving marketing communications from us.
 - 2.2.8 **Customer Services Data** – information relating to your interactions with our customer services team, such as information relating to any complaints you may make or any queries you may raise in relation to use of the Platform, or any reviews or feedback you provide to us.
 - 2.2.9 **Social Media Data** – data we have access to through a social media platform (including Twitter, Facebook, Instagram, LinkedIn, TikTok, Reddit, Telegram and Discord) when you connect with us or like or follow our social media accounts, including your social media handle, photograph, date of birth, location, occupation, interests and other information and content you publish via your social media accounts.
- 2.3 We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Platform 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 policy.
- 2.4 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.

If you fail to provide personal data

- 2.5 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 into with you (for example, the contract for your Subscription). In this case, we may have to cancel the contract you have with us but we will notify you if this is the case at the time.

3. How we collect your personal data

- 3.1 We use different methods to collect your data:

3.1.1 **Direct interactions.** We will collect the majority of personal data we hold about you when you interact with us directly. This includes when you:

- a) create an account for a Subscription;
- b) purchase a Subscription via the Platform;
- c) correspond with our customer services team;
- d) sign up to receive our marketing communications;
- e) provide us with any feedback or reviews.

3.1.2 **Automated technologies or interactions.** As you interact with the Platform (for example by customising your dashboard by adding and removing Applications) and our marketing emails, we will automatically collect Technical and Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our Cookies Policy [here](#) for more information.

3.1.3 **Third parties.** We will receive personal data about you from various third parties as set out below:

- a) We will collect Transaction and Financial Data from our online payment provider (currently Stripe) who provides payment services to us to allow us to process electronic payments for Subscriptions.

- b) We will receive Technical and Usage Data from analytics providers (such as Google Analytics and Plausible), our marketing service providers (such as Mailchimp) and advertising networks (such as Investing Channel).
- c) We will receive Social Media Data from the operators of social media platforms, including Twitter, Facebook, Instagram, LinkedIn, TikTok, Reddit, Telegram and Discord who are based both inside and outside of the UK and EEA.

4. How we use your personal data

4.1 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:

4.1.1 where we need to **perform a contract** we are about to enter into or have entered into with you;

4.1.2 where it is necessary for our **legitimate interests** (or those of a third party). Legitimate interests mean our interests in conducting and managing our business to enable us to give our customers the best service 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 do so 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; and

4.1.3 where we need to **comply with a legal obligation** that we are subject to.

4.2 Generally, we do not rely on consent as a legal basis for processing your personal data. However, we will obtain your consent before sending direct marketing communications to you via email or text message. You have the right to withdraw your consent at any time by amending your marketing preferences via your account settings in the Platform. We will also obtain your consent to collect certain Usage and Technical

Data when we ask you to consent to our use of cookies.

Purposes for which we will use your personal data

- 4.3 We have set out in the below table 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.
- 4.4 Note that we may process your personal data on more than one legal basis depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal basis we are relying on to process your personal data where more than one is set out in the below table.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer when you create an account for a Subscription.	(a) Identity Data (b) Contact Data (c) Account Data	Performance of a contract with you.
To collect and recover money owed to us when you purchase a Subscription.	(a) Identity Data (b) Contact Data (c) Account Data (d) Transaction and Financial Data	(a) Performance of a contract with you. (b) Necessary for our legitimate interests (to recover debts due to us).
To deliver the features and services included in your Subscription and chosen by you, and to manage your Subscription.	(a) Identity Data (b) Contact Data (c) Account Data (d) Technical Data (e) Usage Data	(a) Performance of a contract with you. (b) Necessary for our legitimate interests (to provide a good service to our customers).
To manage our relationship with you which will include: (a) notifying you about	(a) Identity Data (b) Contact Data (c) Account Data (d) Marketing and	(a) Performance of a contract with you. (b) Necessary to comply with a legal obligation.

<p>changes to our terms or privacy policy;</p> <p>(b) asking you to leave a review or take a survey.</p>	<p>Communications Data</p> <p>(e) Customer Services Data</p> <p>(f) Social Media Data</p>	<p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our services).</p>
<p>To correspond with you concerning your account for your Subscription and to respond to any queries and/or complaints you may raise.</p>	<p>(a) Identity Data</p> <p>(b) Contact Data</p> <p>(c) Account Data</p> <p>(d) Customer Services Data</p> <p>(e) Social Media Data</p>	<p>(a) Performance of a contract with you.</p> <p>(b) Necessary for our legitimate interests (to provide a good service and maintain good relationships with customers).</p>
<p>To administer and protect our business and Platform (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).</p>	<p>(a) Identity Data</p> <p>(b) Contact Data</p> <p>(c) Account Data</p> <p>(d) Technical Data</p>	<p>(a) Necessary for our legitimate interests (for 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).</p> <p>(b) Necessary to comply with a legal obligation.</p>
<p>To deliver relevant Platform content and advertisements to you (through the Platform and via marketing communications) and to measure or understand the effectiveness of the</p>	<p>(a) Identity Data</p> <p>(b) Contact Data</p> <p>(c) Account Data</p> <p>(d) Technical Data</p> <p>(e) Usage Data</p> <p>(f) Marketing and Communications Data</p>	<p>Necessary for our legitimate interests (to obtain advertising revenue from third parties, to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy).</p>

advertising we serve to you.	(g) Social Media Data	
To use data analytics to improve our Platform, services, marketing, customer relationships and experiences.	(a) Technical Data (b) Usage Data (c) Marketing and Communications Data (d) Social Media Data	Necessary for our legitimate interests (to define types of customers for our services, to keep our Platform updated and relevant, to develop our business and to inform our marketing strategy).

Change of purpose

4.5 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 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.

4.6 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. Who we share your personal data with

5.1 Where you have chosen to add a Third Party Application to your dashboard in the Platform, we will ask for your consent to share your Identity, Contact and Account Data with the third party who provides and operates that Third Party Application so that they can create an account for you to use that Third Party Application. Such third party will process your personal data as a data controller in accordance with their own privacy policy.

5.2 We will share your personal data with the following third parties who provide services to us in connection with the Platform:

5.2.1 IT companies who support our Platform and provide other business services,

such as the third parties who host our Platform (currently Cloudflare and Amazon Web Services) and the third party who processes payments from customers on our behalf (currently Stripe).

- 5.2.2 Marketing companies who help us manage our marketing communications, such as Mailchimp and Bambu Media.
 - 5.2.3 Online data analytics companies who provide us with insights into how our Platform is used and allow us to improve our services, such as Google Analytics and Plausible.
 - 5.2.4 Online search engines to advertise our services to you while you're browsing the internet and using social media platforms, such as Google.
 - 5.2.5 Professional advisors (including lawyers, bankers, auditors and insurers) who provide consultancy, banking, legal, insurance and accountancy services.
- 5.3 We will also share your personal data with the following third parties in the following circumstances:
- 5.3.1 Third parties to whom we may choose to sell, transfer or merge parts of our business or assets. Alternatively, we may seek to acquire other businesses or merge with them.
 - 5.3.2 Third parties where we are under a duty to disclose or share your personal data with them in order to comply with any legal obligation, or to protect the rights, property or safety of our business, our customers or others, including HM Revenue & Customs, the police, regulators and other authorities and public bodies.
- 5.4 Where we share your personal data with a third party for them to process as a data processor on our behalf, we require those data processors 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

6.1 Some of the third parties we share your personal data with are located outside of the UK, for example, Stripe, Cloudflare and Amazon Web Services.

6.2 Whenever we transfer your personal data outside of the UK to third parties who process that data as data processors on our behalf, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

6.2.1 We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data in accordance with UK adequacy regulations.

6.2.2 Where we use certain service providers outside of the UK in countries that have not been granted adequacy, we may enter into standard data protection clauses with such service providers that are recognised or issued in accordance with UK data protection law.

6.3 Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

7. Data security

7.1 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.

7.2 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

How long will you use my personal data for?



- 8.1 We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.
- 8.2 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.
- 8.3 In some circumstances you can ask us to delete your data: see section 9 below for further information.
- 8.4 In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

- 9.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:
 - 9.1.1 **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.
 - 9.1.2 **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.
 - 9.1.3 **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.

9.1.4 **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.

9.1.5 **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:

- a) If you want us to establish the data's accuracy.
- b) Where our use of the data is unlawful but you do not want us to erase it.
- c) 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.
- d) You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

9.1.6 **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.

9.1.7 **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.

9.2 If you wish to exercise any of the rights set out above, please contact us by email at support@piqsuite.com.

No fee usually required

9.3 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 could refuse to comply with your request in these circumstances.

What we may need from you

9.4 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.

Time limit to respond

9.5 We try to respond to all legitimate requests within one month. Occasionally it could 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.