



Privacy Policy



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Kao Data Campus Locations

- London Road, Harlow, CM17 9NA
- Galvin Road, Slough, SL1 4AN
- Rowdell Road, Northolt, UB5 6AG

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Privacy Policy

1. Purpose

This policy sets out the company's commitment to data protection, and individual rights and obligations in relation to personal data in accordance with the EU General Data Protection Regulation 2018 (GDPR) and the Data Protection Act 2018 (DPA).

2. Our Approach

- 2.1 Harlow Operations Limited (trading as Kao Data) (Registered Company Number: 09227383) ("**we**", "**our**" and "**us**") is committed to protecting your privacy. This Privacy Policy (the "**Policy**") explains (i) how we process the personal information we collect about you, (ii) how you can instruct us if you prefer to limit the use of that information and (iii) what procedures we have in place to safeguard your privacy.
- 2.2 If you do not agree to this Policy, you must not use or submit information to us through or in connection with your use of www.kaodata.com (the "**Website**"). If you are a customer of ours or you are a visitor to our site this Policy will not apply; instead our customer privacy policy and/or site visitor policy will apply to our processing of your Personal Data.
- 2.3 If you have any questions about this Policy or would like any further information, please email us at compliance@kaodata.com

3. What Information do we Collect

- 3.1 We will use, store or otherwise process any of your Personal Data in accordance with the terms of this Policy. Personal data means any information relating to a person who can be identified either directly or indirectly ("**Personal Data**"). It may include name, address, email address, phone number, IP address your professional information (i.e. your company name, title and role) and any other Personal Data collected as further set out in this section, to the extent reasonably necessary to provide the offerings that are available to you by us.
- 3.2 You may give us information about yourself when you sign up to receive our newsletter on our Website. This may include your name, email address, address, phone number, company and any other additional information that you may choose to provide to us.
- 3.3 You may give us information about yourself when you complete a 'contact us' form on our Website. This may include your name, email address, address, phone number, company and any other additional information that you may choose to provide to us.
- 3.4 You may give us information about yourself when you complete an event registration form on our Website. This may include your name, email address, phone number, company and any other additional information that you may choose to provide us with.
- 3.5 When you visit our Website, we may automatically collect the following information:
- 3.5.1 technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- 3.5.2 information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; 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.

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4. How we will Use your Personal Data

- 4.1 We will only process your Personal Data, in accordance with applicable law, for the following purposes:
- **internal record keeping;**
 - **personalising your interaction with us;**
 - **enabling our consultants, suppliers and service providers to carry out certain functions** on our behalf, including payments processing, verification, technical, logistical or other functions;
 - **ensuring the security of our organisation**, including the preventing or detecting fraud or abuses of our Website;
 - **resolving any disputes**, if you lawfully exercise your rights or if you wish to dispute the use of a video recording, for example, or any other part of our offering;
 - **carrying out marketing campaigns** and sending you personalised marketing communications, where you have agreed that we may do so, in order to keep you informed of our offering, which we consider may be of interest to you;
 - **developing and improving our offering**, for example, by reviewing visits to our Website and its various subpages; and
 - **to comply with applicable law**, for example, in response to a request from a court or regulatory body, where such request is made in accordance with the law.
- 4.2 We will take reasonable steps to ensure the Personal Data that we store is accurate, complete and up-to-date.

5. Grounds for Processing

- 5.1 To process your Personal Data lawfully we need to rely on one or more valid legal grounds. The grounds we may rely upon include:
- 5.1.1 your consent to particular processing activities. For example, where you have consented to us using your information for marketing purposes;
- 5.1.2 our legitimate interests as a business (except where your interests or fundamental rights override these). For example, it is within our legitimate interests to use your Personal Data to prevent or detect fraud or abuses of our Website;
- 5.1.3 our compliance with a legal obligation to which we are subject. For example, we have a duty to investigate and respond to complaints made against us and may need to process your Personal Data as part of such investigation; or
- 5.1.4 if you are a member or your employer is a member in receipt of our Services, because processing your Personal Data is necessary for the performance of a contract.

6. Information Security

- 6.1 The Internet is not a secure medium. However, we have put in place various security procedures as set out in this Policy.
- 6.2 Please be aware that communications over the Internet, such as emails and online messages are not secure unless they have been encrypted. Your communications may route through a number of countries before being delivered – this is the nature of the Internet. We cannot accept responsibility for any unauthorised access or loss of Personal Data that is beyond our control.

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- 6.3 We believe that we have appropriate policies, rules and technical measures to protect the Personal Data that we have under our control (having regard to the type and amount of that Personal Data) from unauthorised access, improper use or disclosure, unauthorised modification, unlawful destruction or accidental loss.

7. Disclosure of your Personal Information

- 7.1 There are circumstances where we may wish to disclose or are compelled to disclose your Personal Data to third parties. This will only take place in accordance with the applicable law and for the purposes listed above. These scenarios include disclosure:
- to our employees and consultants;
 - to our outsourced service providers or suppliers who assist us in operating our Website and running the business (including but not limited to IT support service providers), so long as those parties agree to keep the Personal Data confidential;
 - to third party service providers and consultants in order to protect the security or integrity of our organisation, including our databases and systems and for business continuity reasons as well as those third party service providers who assist us with our financial management and invoicing;
 - to another legal entity, on a temporary or permanent basis, for the purposes of a joint venture, collaboration, merger, sale, reorganisation, change of legal form, dissolution or similar event. In the case of a merger or sale, your Personal Data will be permanently transferred to a successor;
 - to legal advisors who may need to advise us or manage or litigate a claim;
 - to public authorities or other third parties where we are required by law to do so; and
 - to any other third party where you have provided your consent.
- 7.2 We do not provide your Personal Data to agencies or outside companies for marketing purposes and do not, sell, trade, share or transfer your personal data to any third parties other than those identified in this Policy.

8. Retention of Personal Data

Your Personal Data will be retained for as long as it is necessary to carry out the purposes set out in this Policy (unless longer retention is required by the applicable law). However, we will not retain any of your Personal Data beyond this period and the retention of your Personal Data will be subject to periodic review. We may keep an anonymised form of your Personal Data, which will no longer refer to you, for statistical purposes without time limits, to the extent that we have a legitimate and lawful interest in doing so.

9. Your Rights in Relation to Your Information

- 9.1 Data protection law provides you with certain rights, including the right to: access, rectify, withdraw consent, erase, restrict, transport, and object to the processing of, your Personal Data. You also have the right to lodge a complaint with the relevant data protection authority if you believe your Personal Data is not being processed in accordance with applicable data protection law. Further information about your rights is set out below:
- **Right to make subject access request (SAR).** You may, where permitted by applicable law, request copies of your Personal Data. If you would like to make a SAR, i.e. a request for copies of the Personal Data we hold about you, you may do so by contacting us at the details set out in Section 1.2. The request should make clear that a SAR is being made. Please quote your name and address. We should be grateful if you would also provide brief details of the information of which

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you would like a copy or which you would like to be corrected – this helps us to more readily locate your data. We will require proof of your identity before providing you with details of any Personal Data we may hold about you.

- **Right to rectification.** You may request that we rectify any inaccurate and/or complete any incomplete Personal Data.
- **Right to withdraw consent.** You may, as permitted by applicable law, withdraw your consent to the processing of your Personal Data at any time. Such withdrawal will not affect the lawfulness of processing based on your previous consent. Please note that if you withdraw your consent, you may not be able to benefit from certain service features for which the processing of your Personal Data is essential.
- **Right to object to processing.** You may, as permitted by applicable law, request that we stop processing your Personal Data
- **Right to erasure.** You may request that we erase your Personal Data and we will comply, unless there is a lawful reason for not doing so.
- **Your right to lodge a complaint with the supervisory authority.** We suggest that you contact us about any questions or if you have a complaint in relation to how we process your Personal Data. However, you do have the right to contact the relevant supervisory authority directly. To contact the Information Commissioner’s Office in the United Kingdom, please visit the [ICO website](#).

10. Cookies

- 10.1 When you visit and interact with the Website, certain data is collected from your device through the use of cookies. The data collected through cookies includes: (i) the visited webpages, (ii) date, time and duration of the visit, and (iii) unique device identifier and device type (desktop, tablet or smartphone).
- 10.2 There are generally two categories of cookies used on the Website:
- 10.2.1 Analytical cookies that are used to collect information about the date and time of your visit, the duration of your visit and the pages you visit. This information is used to better understand the use of the Website and to improve the Website.
- 10.2.2 Functional cookies that are used to collect information about the type of device you are using to visit the Website. This information is strictly necessary to offer you the basic functionality of the Website.
- 10.3 You can choose to have your device warn you each time a cookie is being sent, or you can choose to turn off cookies. You can do this through your browser settings on each browser and device that you use. Each browser is different, so look at your browser Help menu to learn the correct way to modify your cookies. If you turn cookies off, you may not have access to features that make the Website more efficient and some of the features of the Website may not function properly.
- 10.4 To comply with current legislation, we need to ask for your consent to set the analytical cookies described above. When you arrive on our website a pop-up message will appear asking for your consent to place analytical cookies on your device. In order to provide your consent, please click ‘continue’. Once your consent has been provided this message will not appear again when you revisit our website. If you, or another user of your computer, wish to withdraw your consent at any time, you can do so by altering your browser settings.

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11. Linked Websites

We are not responsible for the privacy policies and practices of other websites even if you accessed the third party website using links from our website. We recommend that you check the policy of each website you visit before deciding whether to proceed and contact the owner or operator of such website if you have concerns or questions.

12. Third Parties

Where you submit information on behalf of another person, you confirm that you have made that person aware of how we may collect, use and disclose their Personal Data, the reason you have provided it, how they can contact us, the terms of this Policy and that they have consented to such collection, use and disclosure.

13. Compliance with Privacy Laws

We comply with the data protection and privacy laws to which we are subject. You should satisfy yourself that you are familiar with those laws, including any exceptions which may apply under them. You should also be aware that privacy laws in various jurisdictions may change from time to time.


14. Changes to this Policy


We reserve the right to amend or modify this Policy without notice to you and if we do so we will post the changes on this page. It is your responsibility to check our Policy each time before you access our website for any changes.

15. Sign off

Signed

Signed

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Lee Myall
 Chief Executive Officer, Kao Data
 Published: July 2023

Paul Finch
 Chief Operations Officer, Kao Data
 Published: July 2023

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