

We, Big Sofa Technologies Group plc ("**We**," "**Us**") are committed to protecting and respecting your privacy and keeping you fully informed about our use of cookies.

Everyone has rights with regard to the way in which their personal data is handled. During the course of our activities we will collect, store and process personal data about our customers, suppliers, participants in studies and other third parties, and we recognise that the correct and lawful treatment of this data will maintain confidence in the organisation and will provide for successful business operations.

This following Privacy and Cookies Policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

We are mindful of the importance of upholding the security of information under our control. All data collected through the www.bigsofatech.com website (the "**Website**") and from our customers and data subjects taking part in studies is stored on secure servers and we have stringent security and confidentiality procedures covering the storage and disclosure of such information, in accordance with UK data protection laws.

For the purpose of UK data protection laws, the data controller is Big Sofa Technologies Group, plc (registered number: 07847321) of Finsgate, 5-7 Cranwood Street, London EC1V 9EE.

DATA PROTECTION PRINCIPLES

When processing your information, we must comply with the six enforceable principles of good practice. These provide that your personal data must be:

- processed lawfully, fairly and in a transparent manner,
- processed for specified, explicit and legitimate purposes,
- adequate, relevant and limited to what is necessary,
- accurate and kept up-to-date,
- kept for no longer than is necessary, and
- processed in a manner than ensures appropriate security.

INFORMATION YOU GIVE TO US

You may give us information (such as your name, address, email address, 'phone number, employment details, age, gender, personal preferences, opinions, comments and preferences) by:

- filling in forms on the Website, including information provided at the time of registration to use the Website, subscribing to our service, posting material or requesting further services,
- entering a competition or promotion sponsored by us,
- taking part in one of the projects or studies we carry out for our clients, providing us with video footage, photographic images and other personal data from which you may be identifiable,

- reporting a problem with our Website,
- participating in discussion boards or other social media functions on our website,
- signing up to our blog and newsletter,
- giving us your business card,
- entering a survey organised by us, or
- corresponding with us by phone, email, letters or otherwise.

We may use the information you give to us for a number of different purposes. For each purpose, we are required to confirm the 'legal basis' that allows us to use your information, as follows:

Purposes for which we will use the information you give to us	Legal basis
To fulfil our obligations under specific legislation.	It may be necessary for us to comply with a legal obligation to which we are subject under legislation in the country where you are resident.
To carry out our obligations under any contracts entered into between you and us and to provide you with the information and services that you request from us, or that are necessary as part of the study/project you are participating in.	It will be necessary for the performance of the contract between you and us.
To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.	We will only do this if you give us your consent by some specific, informed and unambiguous method.
To notify you about changes to our products and services	It will be necessary for our legitimate business interests to ensure you are aware of the latest updates to the products and services we provide, or may provide, to you.
To provide you with information about other services we offer that are similar to those that you have already purchased or enquired about	We will only do this if you give us your consent on the form from which we collect your data (the registration form) or by some other specific, informed and unambiguous method.
To provide you with information about services we feel may interest you by electronic means (email or SMS)	We will only do this if you give us your consent on the registration form or by some other specific, informed and unambiguous method.
To provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you by electronic means (email or SMS)	We will only do this if you give us your consent on the registration form or by some other specific, informed and unambiguous method.

To tailor our services to suit your particular business needs and meet your objectives	It will be necessary for our legitimate business interests, namely providing the best possible service for your business.
Any other purpose that we notify to you, but are not expressly listed in this table	We will only do this if you give us your consent by some specific, informed and unambiguous method.

As stated in the table above, it is a legal obligation for you to provide us with certain information. If you do not provide us with that information, we may not be able to provide our services to you.

It is also a contractual requirement for you to provide us with certain information. If you do not provide us with that information, we may not be able to perform the contract.

All other information you give us is given entirely at your discretion. If you do not provide that information, then we will be unable to provide a comprehensive and bespoke service to accurately capture the needs of your business, or fulfil our contract.

INFORMATION WE COLLECT ABOUT YOU FROM OTHER SOURCES

When you visit our website, we may collect information about you (such as 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).

When you visit our website, using a mobile device, we may collect information about you (such as country code, language, device name, operating system name and version, GPS location data).

We may also collect information about you by conducting searches of public records (e.g. Companies House, electoral roll, DVLA database), or in the process of confirming your identity via our online ID verification provider.

We may use the information we collect about you for a number of different purposes. For each purpose, we are required to confirm the ‘legal basis’ that allows us to use your information, as follows:

Purposes for which we will process the information	Legal basis for the processing
To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes, to allow you to participate in interactive features of our service, when you choose to do so, to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you and to make suggestions and recommendations to you and other users of our site about services that may	It will be necessary for our legitimate business interests to ensure you receive the best experience possible when accessing and using our website.

interest you or them	
To obtain further information about you, any organisation you represent, with a view to us entering into a contract with you or the organisation you represent	It will be necessary for our legitimate business interests to ensure we are fully aware of all issues relating to your organisation that is the subject of the services you have requested from us.

You can change the settings on your internet browser to restrict the amount of information that we can collect when you visit our website. If you do not allow us to collect this information, then we may be unable to offer you the best experience possible when accessing and using our website.

By clicking on a link to another website or location, you will leave our website and navigate to the other website; in this case, your personal information or anonymous data may be collected by another location. We do not monitor or review these external websites or their contents and shall not be liable for them or their contents. Please check the privacy policies of these other websites before you submit any personal data to them.

COOKIES

Our Website uses cookies to distinguish you from other users of our Website. This helps us to provide you with an enhanced experience when you browse our Website and also allows us to improve our site.

A cookie is a small text file of letters and numbers that is stored on your computer by websites that you visit. Cookies are widely used in order to make websites work, or to make them work more efficiently, as well as to provide information to the owners of the site. Cookies allow a website to remember things like your preferences or what is in your shopping basket. Cookies may be set by the website you are visiting ("**First Party Cookies**") or they may be set by other websites who run content on the page you are viewing ("**Third Party Cookies**"). Some of these cookies are essential in order for you to use our website however some cookies are optional.

We use different types of cookies including session cookies which are deleted after each visit and permanent cookies that remain in place across multiple visits to our site. We also use a third party cookie called "Google Analytics" which monitors use of our website, page visitor numbers etc. Google Analytics cookies do not collect personal data about you.

We use cookies to keep track of your information during the time you view the Website and to identify your particular areas of interest so as to enhance your future visits to this Website. We also use them to collect information about how visitors generally use our Website, as well as to recognise return visitors.

Most web browsers allow some control of cookies through the browser settings. You may refuse to accept certain cookies by activating the setting on your browser, which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of the Website. Unless you have adjusted your browser settings so that it will refuse cookies, our system will issue cookies when you log on to our Website.

You can easily remove from your computer any cookies that have been created in the cookie folder of your browser. The process for doing this may vary from device to device, however, if you click on the 'Help' function from your 'Start' button and enter cookies, you should be able to search for information on how to locate the folder. For information on how to remove cookies on your mobile phone browser, please see your handset manual.

For more information about cookies, including how to see what cookies have been set, how to delete cookies and how to disable them from your browser, please visit: www.allaboutcookies.org.

Your continued use of the Website signifies that you agree to such use of your data and your agreement to the terms of this Privacy and Cookies Policy.

'SPECIAL CATEGORY' DATA

During the course of dealing with you, we may collect information about you relating to your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, criminal convictions, sex life or sexual orientation, or certain types of genetic or biometric data (such information is known as 'special category' data).

This is most likely to occur, for example, if we are conducting a particular study for a client researching a product or service which relates to this type of data.

We will use any 'special category' data that we collect about you in order to perform our analytical and research services for our clients :

- provided we have your explicit consent to use it, or
- we believe that we need to use that data to protect your vital interests where you are not able to provide us with your explicit consent, or
- you have previously made that data public knowledge, or
- we need to use that data to establish, exercise or defend legal claims.

DISCLOSURE OF YOUR INFORMATION

You agree that we have the right to share your personal information (subject to appropriate confidentiality undertakings) with:

- any bona fide regulatory, legal, or Governmental body to whom we are legally obliged to disclose data;
- our auditors and any Quality Assurance Assessors;
- Dropbox, OneDrive, Google Drive and other online cloud providers;
- selected third parties including:
 - business partners, customers, suppliers and sub-contractors to the extent we reasonably consider that it is in your best interests for us to do so, or it is necessary for our legitimate business interests;

- analytics and search engine providers that assist us in the improvement and optimisation of our site;

We will disclose your personal information to third parties:

- in the event that we enter into negotiations to 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;
- if we or substantially all of our assets are acquired by a third party, in which case personal data held by it about you will be one of the assets transferred to the third party; or
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply any contract between you or us, or our website terms of use, or to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

IDENTIFYING YOU AS A CLIENT

If you are a business client, we may identify you as our client in our marketing material, although we will never publicly disclose any confidential information without having obtained your prior consent. If you do not agree to us identifying you as our client, please notify us by writing to the address at the top of this policy, or by emailing us at info@bigsofatech.com

WHERE WE STORE YOUR PERSONAL DATA

We will take all steps reasonably necessary to ensure that your data is treated securely, including taking the following safeguards:

- **Entry controls.** Access to our premises is manned by a security guard during working hours and the entrance to our premises is locked outside working hours.
- **Secure lockable drawers and cupboards.** Desks and cupboards are kept locked when not in use if they hold confidential information of any kind.
- **Methods of disposal.** Paper documents are disposed of by shredding in a manner that ensures confidentiality.
- **Equipment.** Our internal policies require that individual monitors do not show confidential information to passers-by and that users lock or log-off from their computer when it is unattended.
- **Firewalls.**

Some of the data that we collect from you may be transferred to, and stored at, a destination outside the United Kingdom. It may also be processed by personnel operating outside the United Kingdom who work for us. This includes staff engaged in, among other things, the processing of your payment details and the provision of support services in order for us to provide our clients the services they require. By submitting your personal data, you agree to this transfer, storing or processing. If you are concerned about the levels of data security in any of those countries, please let us know and we will endeavour to advise what steps will be taken to protect your data when stored overseas.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

HOW LONG WE WILL STORE YOUR PERSONAL DATA

The length of time that we will store your data will depend on the 'legal basis' for why we are using that data, as follows:

Legal basis	Length of time
Where we use/store your data because it is necessary for the performance of the contract between you and us	We will use/store your data for as long as it is necessary for the performance of the contract between you and us
Where we use/store your data because it is necessary for us to comply with a legal obligation to which we are subject	We will use/store your data for as long as it is necessary for us to comply with our legal obligations
Where we use/store your data because it is necessary for our legitimate business interests	We will use/store your data until you ask us to stop. However, if we can demonstrate the reason why we are using/storing your data overrides your interests, rights and freedoms, then we will continue to use and store your data for as long as it is necessary for the performance of the contract between you and us (or, if earlier, we no longer have a legitimate interest in using/storing your data)
Where we use/store your data because you have given us your specific, informed and unambiguous consent	We will use/store your data until you ask us to stop, or until the purpose for which the information was collected is no longer valid

YOUR RIGHTS

You have various legal rights in relation to the information you give us, or which we collect about you, as follows:

- You have a right to access the information we hold about you free-of-charge, together with various information about why and how we are using your information, to whom we may have disclosed that information, from where we originally obtained the information and for how long we will use your information.

- You have the right to ask us to rectify any information we hold about you that is inaccurate or incomplete.
- You have the right to ask us to erase the information we hold about you (the 'right to be forgotten'). Please note that this right can only be exercised in certain circumstances and, if you ask us to erase your information and we are unable to do so, we will explain why not.
- You have the right to ask us to stop using your information where: (i) the information we hold about you is inaccurate; (ii) we are unlawfully using your information; (iii) we no longer need to use the information; or (iv) we do not have a legitimate reason to use the information. Please note that we may continue to store your information, or use your information for the purpose of legal proceedings or for protecting the rights of any other person.
- You have the right to ask us to transmit the information we hold about you to another person or company in a structured, commonly-used and machine-readable format. Please note that this right can only be exercised in certain circumstances and, if you ask us to transmit your information and we are unable to do so, we will explain why not.
- Where we use/store your information because it is necessary for our legitimate business interests, you have the right to object to us using/storing your information. We will stop using/storing your information unless we can demonstrate why we believe we have a legitimate business interest which overrides your interests, rights and freedoms.
- Where we use/store your data because you have given us your specific, informed and unambiguous consent, you have the right to withdraw your consent at any time.
- You have the right to object to us using/storing your information for direct marketing purposes.

If you wish to exercise any of your legal rights, please contact us at info@bigsofatech.com

You also have the right, at any time, to lodge a complaint with the Information Commissioner's Office if you believe we are not complying with the laws and regulations relating to the use/storage of the information you give us, or that we collect about you.

AUTOMATED DECISION-MAKING

We do not use automated decision-making processes.

CHANGES TO OUR POLICY

Any changes we make to our policy in the future will be posted on our website and, where appropriate, notified to you by email. Please check our Website frequently to see any updates or changes to our policy.

CONTACT

Questions, comments and requests regarding this policy are welcomed and should be emailed to us at info@bigsofatech.com

Our Data Protection Officer is Emma Langdon.