

# DATA PROTECTION PRIVACY POLICY

## Overview

This policy sets out information, guidelines and requirements to ensure that SETL protects all Personal Data and complies with applicable data protection laws and regulations. By visiting this Website, you are accepting and consenting to the practices described in this policy.

In this policy:

- SETL and 'we' our 'our' refers to SETL Limited, a company incorporated in England under company number 11860439 whose registered office is One Love Lane, London, EC2V 7JN.
- 'you' or 'your' refers to any human person accessing the Website.
- 'GDPR' means the General Data Protection Regulation
- the terms 'personal data', 'controller', 'processor' have the meaning given to them in GDPR

When we collect and use your personal information, we do so in compliance with GDPR. We are responsible as a 'controller' of that personal data.

If you have any questions about our policy or how we use your data, you can get in touch by email at [legal@setl.io](mailto:legal@setl.io).

This policy applies to all customers and clients of SETL Limited and individuals who contact us about our services. Please refer to our Candidate Fair Processing Notice and Alumni Fair Processing Notice for information about how we handle your data we hold about you in relation to your employment.

This policy may be modified by SETL from time to time.

## Personal Data Collected

We may collect your details (professional name, address, phone number, email address, etc.), other professional information that are necessary in order to carry out our legitimate business interests. We collect IP addresses of users that access SETL Labs.

## Processing Purpose

We may process your Personal Data if it is necessary to comply with any legal obligation to which we are subject to or where necessary for the purposes of our legitimate business interests (and in certain other limited circumstances). In practice, this means that we will process your Personal Data for one or more of the following purposes:

- for administration purposes;
- to perform research and make statistical analyses and behavioural analyses – subject to your consent for such processing (we may perform research and analysis of non-personal or anonymised data without consent);
- to create customer profiles and to analyse your purchasing preferences – subject to your consent for such processing;
- for marketing purposes (where you represent a business\*);
- to detect and prevent fraud – subject to your consent for such processing;
- for security vetting purposes;
- to improve our services;
- for security of our systems;
- for legal and regulatory compliance, including audits, inspections and responding to requests from legal or regulatory authorities;
- for corporate and commercial matters, including for the purposes of negotiating transactions with potential counterparties.

\* where your Personal Data relates to you in a private capacity, for example is a personal e-mail, or you are a sole trader, we will obtain your consent to use your Personal Data for marketing purposes.

We do use cookies. For further information please see our Cookies Policy.

We do not process your Sensitive Personal Data.

## **Monitoring and Recording Communications**

We monitor and record our communications with you, including e-mails and phone conversations. Information which we collect through these methods will be used for training purposes, quality assurance, to record details about the products and services you order from us or ask us about, and in order to meet our legal and regulatory obligations generally.

## **Where information may be held**

Where necessary for the purposes mentioned above, we may share or disclose Personal Data about you to any of the following recipients:

- affiliates of SETL and staff of those companies, including employees, agents, contractors and other individuals employed and/or retained by those companies who require access to the Personal Data to fulfil the purposes set out above;
- professional advisers and auditors;
- local or foreign regulators, governments and law enforcement authorities and ombudsman
- local or foreign courts, tribunals and arbitrators or other judicial committees; and
- persons in connection with any sale, merger, acquisition, disposal, reorganisation or similar change involving SETL (including any potential or actual purchasers and their advisers).

Information may be transferred internationally to **Australia, United States of America** and other countries around the world, including countries that do not have data protection laws equivalent to those in the UK, for the reasons described above. We have security measures in place to seek to ensure that there is appropriate security for information we hold.

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers to ensure they can only use your personal information to provide services to us and to you.

## **How long we keep your information**

We will hold your Personal Data on our systems and process it for as long as is necessary for the relevant activity. If you us to delete your Personal Data from our systems, we will take reasonable steps to do so.

## **Your rights in respect of Personal Data**

As a customer, you have the right:

- to request confirmation as to whether SETL holds your Personal Data;
- to access your Personal Data being processed by SETL and to certain information about the processing of that Personal Data;
- to require SETL to rectify any inaccurate or incomplete Personal Data about you;
- to require SETL to erase Personal Data about you in certain circumstances; and
- to restrict SETL from processing Personal Data about you in certain circumstances.

If you wish to exercise any of the above rights, please contact us by email at [legal@setl.io](mailto:legal@setl.io). You must provide us with enough information to identify you, for example, your full name and address as well as proof of your identity, such as a copy of your passport or driving licence.

## **Keeping your personal information secure**

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## **How to complain**

We hope that our [Legal department](#) can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at [ico.org.uk/concerns/](http://ico.org.uk/concerns/) or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.