

Website Privacy Policy

Last updated: September 2019

1. Who are we?

FINBOURNE Technology Limited ("We", "us", "our" or "FINBOURNE") and www.FINBOURNE.com is a website (referred to as the "Site") of FINBOURNE Technology Limited. We provide our product 'Lusid' as a software service to customers ("Service"). You can find all our details or contact us on our [Contact Page](#). We are the controller of data for the purpose of this Privacy Policy.

2. What is this document?

We process certain information about you when you contact us, for example, to enquire about or use our Service or visit our Site. Some of that information may enable you to be identifiable ("Personal Data").

This Privacy Policy explains how we process that Personal Data.

This Site is not intended for children and we do not knowingly collect data relating to children.

3. What Personal Data do we collect from you?

We collect Personal Data relevant to your use of our Service, contact with us or the activity you choose to undertake on our Site. This includes:

- **Identity Data** includes your name, email address, username or similar identifier.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of Service you have purchased from us.
- **Technical Data** includes 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, screen resolution and other technical characteristics of your device and connection to our Site, screen resolution and other technical characteristics of your device and connection to our Site (as applicable to the device you are using).
- **Profile Data** includes your username and password and your user ID.
- **Usage Data** includes Information about your visit, including the website that referred you to our Site (if applicable), the path that you take through and from our Site (including date and time); pages that 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.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your Personal Data but is not considered Personal Data as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website 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.
- 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.

4. How do we collect your Personal Data?

We use different methods to collect Personal Data from you including as follows:

Enquiring about our Service or subscribing to our publications

If you contact us to ask about our Service or about us generally, either through the Site or otherwise, we will collect and process Identity, Contact and Financial Data.

Signing up for the Service

If you sign up for the Service, either through the evaluation agreement or the subscription agreement, we will collect and process and Financial Data.

Correspondence

If you correspond with us using our contact form or our conversation window function ("HubSpot") then we will collect and process Identity and Contact Data:

Browsing

We collect some Technical and Usage Data.

Candidates applying for a role at FINBOURNE Technology Limited

We will collect your Identity, Contact Data and Profile Data and information relating to your employment history.

We will also collect Personal Data about you during telephone calls, in emails, during face to face interviews and from Recruitment Companies, Head-Hunters and Professional Social Sites.

We would always like to keep in touch with excellent candidates regarding any future vacancies and as a result, your consent also includes the ability for FINBOURNE Technology Limited to retain your personal details.

5. How do we use Personal Data collected from you?

- We will only use your Personal Data when the law allows us to. Most commonly, we use it in the following circumstances: Where we need to perform the contract we are about to or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests).
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your Personal Data other than in relation to sending you third party direct marketing communications to you via email or text message. You have the right to withdraw your consent at any time.

The provision of your Personal Data is necessary when Personal Data is required for the purposes of entering into a contract with you or to receive the Services you request, or is otherwise voluntary. If you do not wish to provide your Personal Data to us, we may not be able to: (a) provide the Services you request; or (b) tell you about other products or services that we offer.

6. Purposes for which we will use your Personal Data?

As well uses of your Personal Data for the purposes noted above, we process and store your Personal Data for purposes set out in the following table:

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To perform the contract and provide you with services:	(a) Identity (b) Contact	(a) Performance of a contract with you
(a) Manage payments, fees and charges	(c) Financial (d) Transaction	(b) Necessary for our legitimate interests (to recover debts due to us)
(b) Collect and recover money owed to us	(e) Marketing and Communications	
To process a job application and keep you informed of employment opportunities	(a) Identity (b) Contact (c) Financial (d) Profile	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to recruit good candidates for our business)
To manage our relationship with you which will include:	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation
(a) Notifying you about changes to our terms or privacy policy	(c) Profile (d) Marketing and Communications	(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
(b) Asking you to provide feedback on our Service		
To administer and protect our business and this website (including troubleshooting, data	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent

analysis, testing, system maintenance, support, reporting and hosting of data)

fraud and in the context of a business reorganisation or group restructuring exercise)

(b) Necessary to comply with a legal obligation

To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you

(a) Identity
(b) Contact
(c) Profile
(d) Usage
(e) Marketing and Communications
(f) Technical

Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)

To use data analytics to improve our website, products/services, marketing, customer relationships and experiences

(a) Technical
(b) Usage

Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

To make suggestions and recommendations to you about goods or 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)

7. Who do we share your Personal Data with?

We may share your Personal Data within FINBOURNE (i.e. our officers, staff and contractors) and with our service providers, for example to service your requests or provide you with information. We may also share your Personal Data if a change happens in our business such as a merger or acquisition. If that happens then the new owners may use your Personal Data in the same way as set out in this Privacy Policy.

We may also share your Personal Data with other organisations or individuals when we it is reasonably necessary to:

- Meet any applicable law, regulation, legal process or request of a governmental body or public authority.
- Enforce applicable legal terms and conditions or our other legal rights, including investigation of potential violations.
- Detect, prevent, or otherwise address fraud, crime, security or technical issues.
- Protect against or prevent harm to the rights, property or safety of FINBOURNE, our clients or the public as required or permitted by law.

8. Where is your Personal Data stored and processed?

We will process and store your Personal Data on our Site servers, email and other servers and equipment as applicable.

We employ organisational and technical security methods to protect your Personal Data.

We do not ordinarily transfer your Personal Data outside of the European Economic Area except as follows:

HubSpot

HubSpot (HubSpot Inc.) provides us with live chat correspondence and associated analytics functionality on our Site. HubSpot may collect and/or transfer your Personal Data outside of the European Economic Area.

- For more details about how HubSpot processes your Personal Data please refer to its privacy policy: <https://legal.hubspot.com/privacy-policy>

Analytics providers

Our service providers Mixpanel (Mixpanel, Inc.) and Google Analytics (Google Inc. and its affiliates) may process your Personal Data in the course of providing analytical information to us about the use of our Site. These service providers may collect and/or transfer your Personal Data outside of the European Economic Area.

- For more information about how Mixpanel processes your Personal Data you can visit here: <https://mixpanel.com/privacy/>
- For more information on how Google Analytics processes your Personal Data you can visit here: <https://support.google.com/analytics/answer/6004245?hl=en-GB>

9. How long do we keep your Personal Data?

We will not keep your Personal Data longer than reasonably necessary to fulfil the purposes described in this Privacy Policy or as we reasonably need to in order to meet our legal and governance obligations.

10. What direct marketing do we conduct?

If you provide your contact details, we might contact you individually in the future if we think that our services may be of interest to you.

If we think it appropriate we might also add you to our regular email marketing list.

You can ask us to remove your personal details from our marketing lists using the contact details below.

11. Links to other websites

Our Site 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 those websites and are not responsible for their privacy statements.

We encourage you to read the privacy statements on the other websites you visit.

12. Changes

We may update this Privacy Policy from time to time. We will post any Privacy Policy changes on our Site. Please check for any updates to this Privacy Policy when you access our Site again.

13. Your rights

Under certain circumstances, you have rights under data protection laws in relation to your Personal Data.

Request access to your Personal Data (commonly known as a "data subject access request"). This enables you to confirm with us whether your Personal Data is processed and, if it is to receive a copy of the Personal Data we hold about you.

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.

Request erasure of your Personal Data in certain circumstances. This enables you to ask us to delete or remove Personal Data where it is no longer necessary 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 Personal Data unlawfully or where we are required to erase your Personal Data to comply with applicable law. However, the right to erasure is not an absolute right and we may not always be required to comply with your request for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your Personal Data where we are relying on a legitimate interest (or those of a third party). In some cases, we may demonstrate that we have compelling legitimate grounds to process your Personal Data which override your rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes.

Request restriction of processing of your Personal Data in certain circumstances. This enables you to ask us to suspend the processing of your Personal Data in the following circumstances: (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; or (d) you have objected to our use of your Personal Data when relying on a legitimate interest but we need to verify whether we have overriding legitimate grounds to use it.

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 Personal Data processed by automated means which you initially provided consent for us to use or where we used the information to perform a contract with you.

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.

Right to complain: You also have the right to lodge a complaint with the competent data protection supervisory authority, which in the UK is the Information Commissioner's Office.

Contact Us

If you wish to exercise any of the rights set out above, please contact data.protection@finbourne.com.

No fee usually required

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 may refuse to comply with your request in these circumstances.

What we may need from you

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.

