

PIVOTLAB – PRIVACY POLICY

1. Introduction

We are Pivot Lab Limited, a company registered in Scotland under registration number SC680896 (“**PivotLab**”, “**we**”, “**our**” or “**us**”). Our registered address is C/O Accountancy Assured Limited, 20a Bridge Street, Musselburgh, East Lothian, Scotland, EH21 6AG.

We are the controller of personal data obtained via our website www.pivotlab.uk (the “**Site**”) and via our services that we provide to our clients (the “**Services**”). As data controller, we are the organisation legally responsible for deciding how and for what purposes it is used.

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information about who we are and how and why we collect, store, use and share any information relating to you (your “**personal data**”) in connection with your use of our Site and the delivery of our Services. It also explains your rights in relation to your personal data and how to contact us or a relevant regulator in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (“**UK GDPR**”).

2. What this privacy policy applies to

This privacy policy relates to your use of our Site and the Services. By using our Site or our Services, by providing, disclosing or submitting your personal data to us or by consenting to our privacy policy you are taken to accept the terms of this policy, so please read these documents carefully. If you do not agree to this privacy policy, please do not access the Site or otherwise submit personal data to us.

Throughout our Site we may link to other websites owned and operated by certain trusted third parties to, for example, create marketing communications or to link to certain social media platforms. Those third-party websites may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to those third-party websites, please consult their own separate privacy policies, as appropriate.

3. Personal data we collect about you

The personal data we collect about you depends on the particular activities carried out through our Site and via our Services. We will collect and use the following personal data about you:

- contact details (such as name, job title, telephone number, e-mail address, and details of our recent contact);
- personal data from our own market research. This may include name, contact detail, quotes and survey/interview transcripts. It may also include photos, audio and video recordings;
- personal data from our own research of publicly available sources e.g. company names or individuals and their job roles; and

- website statistics at aggregate level that do not identify individuals but enable us to understand the performance of our Site.

All personal data we ask for is required to use our Site or is used in connection with providing our Services, unless we have marked it as optional. We will tell you whether declining to share that personal data will have any effect on your use of our Site or any of the Services.

We collect and use this personal data for the purposes described in the section 'How and why we use your personal data' below.

4. How your personal data is collected.

We collect personal data from you:

- directly, when you enter or send us information, such as when you: contact us (including via email), participate in our Services, complete surveys and/or take part in our market research;
- indirectly, such as your browsing activity while on our Site; we will usually collect information indirectly using the technologies explained in the appendix on 'Cookies' below; and
- indirectly, such as when we search for published business contact details or use other databases to carry out such searches.

5. How and why we use your personal data

We use Contact Information to identify you and communicate with you, including:

- to contact you;
- to send you survey and market research questionnaires;
- to send you marketing communications;
- to personalise our communications;
- to provide customer service; and
- for our everyday business purposes in accordance with the law, such as for legal and other information you've requested.

Under data protection law, we can only use your personal data if we have a proper reason, e.g.:

- where you have given consent;
- to comply with our legal and regulatory obligations;
- for the performance of a contract with you or to take steps at your request before entering into a contract; or
- for our legitimate interests or those of a third party.

A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. When relying on legitimate interests, we consider and review the balance of our interests against your own.

The table below explains what we use your personal data for and why.

What we use your personal data for	Our reasons
Communications with you not related to marketing, including about changes to our terms or policies or changes to the products and/or services or other important notices	Depending on the circumstances: <ul style="list-style-type: none"> • to comply with our legal and regulatory obligations • in other cases, for our legitimate interests, i.e. to be as efficient as we can so we can deliver the best service to you
Market research analysis	<ul style="list-style-type: none"> • your consent, as requested by us
Analysis of our customer base, to carry out analysis of our client's customers (where we are controller of that personal data) and to share that personal data with the relevant client	<ul style="list-style-type: none"> • for our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you • your consent, as requested by us
Enforcing legal rights or defend or undertake legal proceedings	Depending on the circumstances: <ul style="list-style-type: none"> • to comply with applicable legal obligations • in other cases, for our legitimate interests, ie to protect our business, interests and rights

What we use your personal data for	Our reasons
<p>Retaining and evaluating information on your recent visits to our Site and how you move around different sections of our Site for analytics purposes to understand how people use our Site so that we can make it more intuitive or to check our Site is working as intended</p>	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> • your consent as gathered by the separate cookies tool on our Site (see 'Cookies' below) • where we are not required to obtain your consent and do not do so, for our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you • if you have provided such a consent you may withdraw it at any time by changing the setting on the cookies tool (this will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn)
<p>Protecting the security of systems and data used to provide the Services</p>	<ul style="list-style-type: none"> • To comply with our legal and regulatory obligations • We may also use your personal data to ensure the security of systems and data to a standard that goes beyond our legal obligations, and in those cases our reasons are for our legitimate interests, ie to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us
<p>Statistical analysis to help us understand our client base</p>	<p>For our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you</p>
<p>Updating and enhancing client records</p>	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> • to perform our contract with you or to take steps at your request before entering into a contract • to comply with our legal and regulatory obligations • where neither of the above apply, for our legitimate interests, eg making sure that we can keep in touch with our clients about existing orders and new products

What we use your personal data for	Our reasons
Disclosures and other activities necessary to comply with legal and regulatory obligations that apply to our business, eg to record and demonstrate evidence of your consents where relevant	To comply with our legal and regulatory obligations
Marketing our Services to existing and former clients	For our legitimate interests, ie to promote our business to existing and former clients See 'Marketing' below for further information
To share your personal data with third parties that will or may take control or ownership of some or all of our business (and professional advisors acting on our or their behalf) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency In such cases information will be anonymised where possible and only shared where necessary	Depending on the circumstances: <ul style="list-style-type: none"> • to comply with our legal and regulatory obligations • in other cases, for our legitimate interests, ie to protect, realise or grow the value in our business and assets

6. Marketing

We will use your personal data to send you updates (by email) about our services.

We have a legitimate interest in using your personal data for marketing purposes (see above 'How and why we use your personal data'). This means we do not need your consent to send you marketing information. If we change our marketing approach in the future so that consent is needed, we will ask for this separately and clearly.

You have the right to opt out of receiving marketing communications at any time by:

- contacting us at enquiries@pivotlab.uk; or
- using the 'unsubscribe' link in emails

We may ask you to confirm or update your marketing preferences if you ask us to provide further products and/or services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will always treat your personal data with the utmost respect and never sell it to other organisations for marketing purposes.

For more information on your right to object at any time to your personal data being used for marketing purposes, see 'Your rights' below.

8. Who we share your personal data with

We routinely share personal data with:

- third parties we use to help deliver our services to you, for example IT providers;
- other third parties we use to help us run our business, for example, marketing agencies or Site hosts and Site analytics providers; and
- our clients if we have your express consent to share your personal information and other details from our research.

We occasionally also share personal data with:

- our external auditors, eg in relation to the audit of our accounts, in which case the recipient of the information will be bound by confidentiality obligations;
- our and their professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations;
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations; and/or
- other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency—usually, information will be anonymised but this may not always be possible. The recipient of any of your personal data will be bound by confidentiality obligations

9. Who we share your personal data with—further information

If you would like more information about who we share our data with and why, please contact us (see 'How to contact us' below).

10. How long your personal data will be kept

We will not keep your personal data for longer than we need it for the purpose for which it is used. Different retention periods apply for different types of personal data.

Following the end of the relevant retention period, we will delete or anonymise your personal data.

11. Transferring your personal data out of the UK

The UK and other countries outside the UK have differing data protection laws, some of which may provide lower levels of protection of privacy.

It is sometimes necessary for us to transfer your personal data to countries outside the UK. In those cases, we will comply with applicable UK laws designed to ensure the privacy of your personal data.

We will transfer your personal data to the following list of service providers located outside the UK:

Company	Use	Website	Locations
Google Analytics	Analytics	https://www.google.co.uk/	USA
Wix	Website hosting	https://www.wix.com/free/web-hosting	Various

Under data protection laws, we can only transfer your personal data to a country outside the UK where:

- the UK government has decided the particular country ensures an adequate level of protection of personal data (known as an 'adequacy regulation') further to Article 45 of the UK GDPR. A list of countries the UK currently has adequacy regulations in relation to is available from www.ico.org.uk,
- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for you; or
- a specific exception applies under relevant data protection law.

Where we transfer your personal data outside the UK we do so on the basis of an adequacy regulation or (where this is not available) we may rely on the appropriate safeguards referred to in the UK GDPR: using IDTA or Binding Corporate Rules. In the event we cannot or choose not to continue to rely on either of those mechanisms at any time we will not transfer your personal data outside the UK unless we can do so on the basis of an alternative mechanism or exception provided by UK data protection law and reflected in an update to this policy.

Any changes to the destinations to which we send personal data or in the transfer mechanisms we rely on to transfer personal data internationally will be notified to you in accordance with the section on 'Changes to this privacy policy' below.

12. Transferring your personal data out of the UK — further information

If you would like further information about data transferred outside the UK, please contact us (see 'How to contact us' below).

13. Cookies

A cookie is a small text file which is placed onto your device (eg computer, smartphone or other electronic device) when you use our Site. We use cookies on our Site. These, for example, help us recognise you and your device and store some information about your preferences or past actions.

For further information on our use of cookies, please see further information in the Appendix.

14. Your rights

You generally have the following rights, which you can usually exercise free of charge:

Access to a copy of your personal data	The right to be provided with a copy of your personal data
Correction (also known as rectification)	The right to require us to correct any mistakes in your personal data
Erase (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations
Restriction of use	The right to require us to restrict use of your personal data in certain circumstances, eg if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object to use	<p>The right to object:</p> <ul style="list-style-type: none"> • at any time to your personal data being used for direct marketing (including profiling) • in certain other situations to our continued use of your personal data, eg where we use your personal data for our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims
Not to be subject to decisions without human involvement	<p>The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you</p> <p>We do not make any such decisions based on data collected by our Site</p>

The right to withdraw consents	<p>If you have provided us with a consent to use your personal data you have a right to withdraw that consent easily at any time</p> <p>Withdrawing a consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn</p>
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For further information on each of those rights, including the circumstances in which they do and do not apply, please contact us (see 'How to contact us' below). You may also find it helpful to refer to the [guidance from the UK's Information Commissioner](#) on your rights under the UK GDPR.

If you would like to exercise any of those rights, please email us — see below: 'How to contact us'.

When contacting us please:

- provide enough information to identify yourself (your full name and address) and any additional identity information we may reasonably request from you, and
- let us know which right(s) you want to exercise and the information to which your request relates

15. Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine need to access it.

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.

16. How to complain

Please contact us if you have any queries or concerns about our use of your personal data (see below 'How to contact us'). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with:

- the Information Commissioner in the UK

The UK's Information Commissioner may be contacted using the details at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.

17. Changes to this privacy policy

We may change this privacy policy from time to time—when we make significant (material) changes we will take steps to inform you, for example by including a prominent link to a description of those changes on our Site for a reasonable period or by other means, such as email.

18. How to contact us

You can contact us by email if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

Our contact details
<u>Pivot Lab Limited</u> enquiries@pivotlab.uk

APPENDIX - COOKIES

Our use of cookies.

The table below provides more information about the cookies we use and why:

Cookie	Name	Purpose	Essential Cookie? Do we need your consent?
Universal Analytics (Google)	_ga	<p>This is a web analytics service provided by Google Inc which uses cookies to show us how visitors found and explored our site, and how we can enhance their experience. It provides us with information about the behaviour of our visitors (eg how long they stayed on the site, the average number of pages viewed) and also tells us how many visitors we have had.</p> <p>This cookie remains for 2 years.</p> <p>https://support.google.com/analytics/answer/11397207?hl=en</p>	Yes, essential (we will therefore not request your consent before placing this cookie).
Universal Analytics (Google)	_ga_<container-id>	<p>This is a web analytics service provided by Google Inc which uses cookies to show us how visitors found and explored our site, and how we can enhance their experience. It provides us with information about the behaviour of our visitors (eg how long they stayed on the site, the average number of pages viewed) and also tells us how many visitors we have had</p> <p>This cookie remains for 2</p>	Yes, essential (we will therefore not request your consent before placing this cookie).

		<p>years.</p> <p>https://support.google.com/analytics/answer/11397207?hl=en</p>	
Universal Analytics (Google)	_gid	<p>This is a web analytics service provided by Google Inc which uses cookies to show us how visitors found and explored our site, and how we can enhance their experience. It provides us with information about the behaviour of our visitors (eg how long they stayed on the site, the average number of pages viewed) and also tells us how many visitors we have had</p> <p>This cookie remains for 24 hours.</p> <p>https://support.google.com/analytics/answer/11397207?hl=en</p>	Yes, essential (we will therefore not request your consent before placing this cookie).
Wix	hs	Security reasons for the duration of a session	Yes, essential (we will therefore not request your consent before placing this cookie).
Wix	SSR-caching	<p>Used to indicate the system from which the site was rendered. Allows faster viewing of previously viewed content</p> <p>Retained 1 minute</p>	Yes, essential (we will therefore not request your consent before placing this cookie).
Wix	XSRF-token	Security reasons for the duration of a session	Yes, essential (we will therefore not request your consent before placing this cookie).

Wix	svSession	Used in connection with user login. Retained for 12 months.	Yes, essential (we will therefore not request your consent before placing this cookie).
Wix	_wixCIDX	Used for system monitoring/debugging Retained for 3 months	Yes, essential (we will therefore not request your consent before placing this cookie).
Wix	_wix_browser_sess	Used for system monitoring/debugging Retained only for the session.	Yes, essential (we will therefore not request your consent before placing this cookie).
Wix	Consent-policy	Used for cookie banner parameters Retained for 12 months	Yes, essential (we will therefore not request your consent before placing this cookie).