SigmaRoc Privacy Notice

Last updated: October 2026

SigmaRoc PLC respects your right to privacy. This Privacy Notice explains who we are, how we collect, share and use personal data about you and how you can exercise your privacy rights. If you have any questions or concerns about our use of your personal data, then please contact us using the contact details under the "How to contact us" [link] heading below.

1. Personal data we collect and process

a) We collect personal data about you from the following different sources:

- ***Information that you provide directly***
  We collect personal data directly from you when you choose to provide us with this information online either through our contact form on our website or by emailing our teams. We will obtain your name, email address and/or other contact information together with the content of your message.
- ***Information that we collect indirectly***
  We collect your personal data indirectly, including through automated means from your device when you use our website, as explained further in the "Cookies and similar tracking technology" section [link] below.

b) The table below describes the categories of personal data we collect from and about you through our website

Personal Data Description	Source
Identity and Contact Data such as your name, address, email address and telephone number	• Directly from you • Indirectly from you • Third parties
Communications Data such as your feedback on our products and services or the performance of our website and other communications with us (including when you interact with our customer service agents offline), any queries you raise, survey entries, chat, email or call history on the website or with third party service providers. This will include information as to how you contact customer services and the channel of communication that you use or any information that you send to us.	• Directly from you • Indirectly from you • Third parties

Device Data collected from (or as a result of your using) your device (including by means of cookies and similar tracking technology), including your IP address, your ISP, and the browser you use to visit our website, device type, unique device identification numbers or other identifiers.	• Indirectly from you
Website Usage Data such as activity and website interaction, information that we capture using cookies and similar technologies (see the "Cookies and similar tracking technology" section [link] below). This will include page views and searches, clicks, operating system, information about content viewed, watched or downloaded for offline access, length of visits to certain pages, length of website use and other functional information on website performance (for example, application version information, diagnostics, and crash logs).	• Indirectly from you

2. How we use your personal data (our purposes) and our legal basis for processing it

We use the personal data that we collect from and about you only for the purposes described in this Privacy Notice or for purposes that we explain to you at the time we collect your information. Depending on our purpose for collecting your information, we rely on one of the following legal bases:

Purpose/Activity	**Type of personal data**	**Lawful basis for processing including basis of legitimate interest**
Respond to your communications regarding our products and services, send you service updates, confirmations, technical notices, updates, security alerts, support and administrator messages, respond to your enquiries, requests or complaints.	Identity and Contact Data Communications Data Device Data Website Usage Data	• As necessary for our legitimate interests (to operate, provide and improve our business; to communicate with you).
Reviewing communications with you for customer support and quality assurance and training purposes, and related recordkeeping.	Identity and Contact Data Communications Data Device Data Website Usage Data	• Necessary for our legitimate interests (to operate, provide and improve our business; to communicate with you).

Keep our business, including our website, our employees, customers, vendors, and visitors secure and address threats to their safety or the safety of others; to detect and prevent fraud. For example, online we use malware and spyware monitoring tools to detect suspicious activity and algorithms to detect unauthorised access.	Identity and Contact Data Device Data Website Usage Data Communications Data	• Necessary for our and our third parties' legitimate interests (to operate and provide our business, including our website; to detect or prevent illegal activities (e.g. fraud) and/or to manage the security of our IT infrastructure, and the safety and security of our employees, customers, vendors, and visitors).
To administer and maintain our website and our IT systems (including monitoring, troubleshooting, data analysis, testing, system maintenance, repair and support, reporting and hosting of data).	Identity and Contact Data Device Data Website Usage Data	• Necessary for our and our third parties' legitimate interests (to operate, provide and improve our business, including our website; to detect or prevent Illegal activities (e.g. fraud) and/or to manage the security of our IT infrastructure).
Manage our use of tracking technologies such as cookies (including enabling you to manage your cookie preferences) and analyse collected data to learn about our website, to improve our website, and to develop new products and services. This includes website analytics, identifying browsing trends and patterns and evaluating this information on an aggregated, group(s) basis and individual basis	Device Data Website Usage Data Communications Data	• Consent (where required under applicable law – see cookie consent tool on our website). • Otherwise (for strictly necessary cookies) our legitimate interests to operate, provide and improve our business, including our website, to improve our website or use the insights to improve or develop marketing activities and promote our products and services.
Contact current and prospective customers	Identity and Contact Data	• Consent (where required under applicable law).

(including website visitors) about our products and services, promotions, competitions and events we think may be of interest, including our newsletter and other promotional mailers and electronic communications.	Website Usage Data Communication Data	• Otherwise our legitimate interests (to operate, provide and improve our business; to communicate with you and to develop marketing activities and promote our products and services).
Comply with legal and regulatory obligations to which we are subject, including our obligations to respond to your requests under data protection law.	Identity and Contact Data Website Usage Data Communications Data	• Legal obligation.
Protect our legal rights (including where necessary, to share information with law enforcement and others), for example to defend claims against us and to conduct litigation to defend our interests.	Identity and Contact Data Website Usage Data Communications Data	• Our legitimate interests to protect our business interests.

3. Who we share your personal data with

We share your personal data with the following categories of recipients:

- **our group companies [**sigmaroc.com/our-businesses**]**, who provide data processing services necessary to provide you with our goods and services (for example, to support the delivery of, provide functionality on, or help to enhance the security of our website), or who otherwise process personal data for purposes described in this Privacy Notice.;
- **third party service providers and partners** who provide data processing services to us as necessary to provide you with our goods and/or services (to support the delivery of, provide functionality on, or help to enhance the security of our website), or who otherwise process personal data for purposes described in this Privacy Notice.
- any **competent law enforcement body, regulatory, government agency, court or other third party** (such as our professional advisers) where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights or so a third party can defend theirs, or (iii) to protect your vital interests or those of any other person;

- a **buyer** (and its agents and advisers) in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal data only for the purposes disclosed in this Privacy Notice; or
- any **other person with your consent** to the disclosure.

4. Cookies and similar tracking technology

We use cookies and similar tracking technology (collectively, "**Cookies**") to collect and use personal data about you. For further information about the types of Cookies we use, why, and how you can control Cookies, please see our Cookie Banner. [https://www.sigmaroc.com/cookie-settings].

5. How we keep your personal data secure

We use appropriate technical and organisational measures to protect the personal data that we collect and process about you. The measures are designed to provide a level of security appropriate to the risk of processing.

6. International data transfers

In some cases, where your personal data is transferred to another SigmaRoc PLC company or third parties, it is processed in countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective). We have taken appropriate safeguards to ensure that your personal data will remain protected in accordance with this Privacy Notice and applicable laws. Further information on the safeguards taken is available from us (see the "How to contact us" heading below [link]).

7. Data retention

We retain the personal data we collect from you where we have an ongoing legitimate need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements.

8. Your data protection rights

Individuals located in the UK and EEA have the following data protection rights. To exercise any of them see specific instructions below or contact us using the contact details provided under the "How to contact us" heading below [link].

- You may **access, correct, update or request deletion** of your personal data.
- You can **object to processing** of your personal data, ask us to **restrict processing** of your personal data or **request portability** of your personal data.

- You have the right to **opt-out of marketing communications** we send you at any time. If you choose to opt out of marketing communications, we will still send you non-promotional emails, such as emails about your account or our ongoing business relations.
- If we have collected and processed your personal data with your consent, then you can **withdraw your consent** at any time
- You have the **right to complain to a supervisory authority** about our collection and use of your personal data. Contact details for supervisory authorities in Europe are available here and for the UK here.

9. Updates to this Privacy Notice

We may update this Privacy Notice from time to time. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

10. How to contact us

The data controller of your personal data is SigmaRoc plc. If you have any questions or concerns about our use of your personal data, please contact our data protection officer using the following details: dataprivacy@sigmaroc.com.