

PRIVACY AND COOKIES POLICY

About this Policy

This privacy and cookies policy ("Policy") sets out when, how and why we may collect and use your personal information, as well as the type of personal information we may collect from you including through:

- your use of our websites, microsites, portals, platforms and tools;
- your registration to receive newsletters and other marketing communications.

This Policy also sets out your rights and our obligations in respect of the controlling and processing of such information by us.

If you do not agree to the following Policy you may wish to cease viewing / using this website, and/or refrain from submitting your personal data to us.

Policy key definitions

- GDPR means the UK General Data Protection Act.
- PECR means the UK Privacy & Electronic Communications Regulation.
- ICO means the UK Information Commissioner's Office.
- Cookies mean small files stored on a user's computer or device.

Who we are

Signapse Ltd ("Signapse") is a company registered in the UK (registration number 13898753) with registered address: St John's Innovation Centre, Cowley Road, Cambridge, CB4 0WS.

This privacy policy is issued by Signapse, use of "our", "us", or "we" refers to Signapse. Use of "you", "your", "the user" refers to the person using any of our services covered by this Policy.

We are the Data Controller of any personal data you supply to us.

Under the UK GDPR (General Data Protection Regulation) we control and / or process any personal information about you electronically using lawful bases. We are registered with ICO under the Data Protection Register.

We are committed to protecting your privacy. We comply with all applicable UK data protection laws when controlling and processing your data.

If you have any questions about this Policy or our privacy practises, please contact us by email at privacy@signapse.ai.

To the extent that we provide personal information to third party processors, those processors are obliged to comply with this Policy when processing personal information on our behalf. Any breach of this Policy by that third party may result in disciplinary action being taken against them.

The types of personal data we collect about you

Personal data means any information about an individual from which that person can be identified.

We may collect the following information about you:

- Identity Data includes first name, last name, titles or honorifics, job title, employer, title, nationality, ethnicity, date of birth, gender, signature, National Insurance number, photographs, videos, and audio recordings.
- Health Data includes disabilities and special accessibility needs, and dietary requirements.
- Contact Data email address, postal address and telephone numbers
- Financial Data: includes bank account, VAT registration number, County Court Judgements (and other Orders), and other payment details.
- Recruitment Data: for job applicants, this includes Baseline Personnel Security Standard as standard, and Security Clearance checks where required for the recruited role.
- Transaction Data: includes details about payments to and from you and other details of products and services you have purchased from us or provided by us to you.
- 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, and other technology on the devices you use to access this website or any other Signapse website, microsite, portal, platform and tool.

- Profile Data: includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data: includes information about how you use our websites, microsities, portals, platforms and tools, products and services.
- 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 anonymised and/or aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

We collect your personal data in different ways, including when you interact with us, through the use of automated technologies, through third parties or through publicly available sources.

Your Interactions with us

You may give us your personal data by filling in online forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our events, programmes and other opportunities;
- create an account on our website, microsite, portal, platform or tool;
- have provided information to us by applying for a job opportunity;
- subscribe to our newsletter or other publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey;
- are supplying services to us;
- have attended our offices or events.
- have expressed your intention to gain access to our prototype/software download platform(s).
- have participated in a survey, for research or otherwise, conducted either by ourselves directly or through a Third Party provider acting on our behalf.
- provided your business card or contact information to a member of our staff during an engagement/interaction; or
- give us feedback or contact us.

Automated Technologies

As you interact with our websites, microsities, portals, platforms and tools, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.

Cookies and IP addresses

We use cookies on this website to provide you with a better user experience. We do this by placing a small text file on your device / computer hard drive to track how you use the website, to record or log whether you have seen particular messages that we display, to keep you logged into the website where applicable, to display relevant adverts or content, referred you to a third-party website.

Some cookies are required to enjoy and use the full functionality of this website.

We use a cookie control system which allows you to accept the use of cookies, and control which cookies are saved to your device / computer. Some cookies will be saved for specific time periods, where others may last indefinitely. Your web browser should provide you with the controls to manage and delete cookies from your device, please see your web browser options.

Embedded Content

Content on this site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website. These websites may collect data about you, use cookies, embed additional

third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website.

Third parties or publicly available sources.

We may receive personal data about you from various third parties and public sources, including:

- your company/employer's website;
- Social media platforms, such as LinkedIn;
- Sanctions lists;
- Credit reference agencies;
- Disclosure and Barring Service (recruitment and specific notified service providers only);
- your contact details that are available via a third party that has the right to pass them onto us for our particular use e.g. your employer; and
- your personal data available on other publicly-available websites, or public or proprietary databases, such as Companies House.

How we use your personal data

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

Performance of a contract with you: Where we need to perform the contract, we are about to enter into or have entered into with you.

Legitimate interests: We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Legal obligation: We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.

Consent: We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.

When operating under the legal basis of consent, we will continue to process your information until you withdraw consent, or it is determined your consent no longer exists.

Purposes for which we will use your personal data

Purpose	Type of data	Legal Basis
Marketing database records (e.g. lead generation, meeting feedback, contact data, business proposals)	Identity Data Contact Data Marketing & Communications Data	Legitimate Interests (contacting recipient with their data made available for contact)
Unsuccessful Tenders	Identity Data Contact Data Financial Data Transaction Data Technical Data Profile Data Usage Data Marketing & Communications Data	Performance of contract Legitimate Interests (factual recording) Legal Obligation
Customer relations database records (eg contact data, telephone attendance records, queries, meeting feedback, account history etc.).	Identity Data Contact data Usage Data Marketing & Communications Data	Performance of contract Legitimate Interests (factual recording and Impact Assessments) Consent
Marketing Communications	Identity Data Contact data Transaction Data Technical Data Profile Data Usage Data	Performance of contract Consent

	Marketing & Communications Data	
Opt-out/suppression lists	Identity Data Contact Data Marketing & Communications Data	Legal Obligation
Market Research	Identity Data Contact data Transaction Data Profile Data	Performance of contract Legitimate Interests (undertaking research) Consent
Websites, microsites, portals, platforms and tools analytics reports from cookies and other similar technology	Identity Data Technical Data Profile Data Usage Data	Legitimate Interests (performance and analytics) Consent (see opt in/out browser settings and cookie privacy statement pop-up)
Records – Contracts	Identity Data Contact data Financial Data Transaction Data Usage Data Marketing & Communications Data	Performance of contract Legitimate Interests (factual recording) Legal Obligation
Records – Health & Safety	Identity Data Health Data Contact Data Transaction Data	Performance of contract Legitimate Interests (factual recording) Legal Obligation
Records – Marketing Records	Identity Data Contact data Marketing & Communications Data	Legitimate Interests (factual recording) Consent
Records – Procurement	Identity Data Contact data Financial Data Transaction Data	Performance of contract Legitimate Interests (factual recording)

	Marketing & Communications Data	Legal Obligation
Record - Recruitment	Identity Data Health Data Recruitment Data Marketing & Communications Data	Performance of contract Legitimate Interests (factual recording) Legal Obligation

Disclosures of your personal data

We may share your personal data where necessary with our service providers for the purposes set out in the Personal Data Table.

We may also share your data with third parties notified to you at the point of collection of your data.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International Transfers

We may transfer your personal data to service providers that carry out certain functions on our behalf. This may involve transferring personal data outside the UK to countries which have laws that do not provide the same level of data protection as the UK law.

Whenever we transfer your personal data out of the UK to service providers, we ensure a similar degree of protection is afforded to it by ensuring that at least one of the following safeguards are in place:

We will only transfer your personal data to countries that have been deemed by the UK to provide an adequate level of protection for personal data;

We may use specific standard contractual terms approved for use in the UK which give the transferred personal data the same protection as it has in the UK, namely the International Data Transfer Agreement, or The International Data Transfer Addendum to the European Commission's

standard contractual clauses for international data transfers; or

We may use the UK Extension to the EU-US Data Privacy Framework” (UK Extension) under Article 45 of the UK General Data Protection Regulation (GDPR).

Data security and protection

We ensure the security of any personal information we hold by using secure data storage technologies and precise procedures in how we store, access and manage that information. Our methods meet the GDPR compliance requirement.

Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers for six years after they cease being customers for tax and other legal purposes. We may retain your contact details for these purposes.

In some circumstances you can ask us to delete your data: see section below for further information.

Special category data

We may receive special category data such as health information and disability information, and we will use this information for the purposes set out above and we will ask for your explicit consent for that information when you submit it.

Your Legal Rights

You have a number of rights under data protection laws in relation to your personal data. Your rights under UK GDPR are as follows:

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object; and
- the right not to be subject to automated decision-making including profiling.

You can request to receive an exported file of the personal data we hold about you, including any data you have provided to us. You can also request that we erase any personal data we hold about you. This does not include any data we are obliged to keep for administrative, legal, or security purposes. If you require any further information, please contact us at privacy@signapse.ai.

We handle subject access requests in accordance with UK GDPR.

Complaints

You also have the right to complain to the ICO www.ico.org.uk if you feel there is a problem with the way we are handling your data.

We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to your personal data and the privacy policy

We keep our privacy policy under regular review and will update it from time to time. This is version 2.0.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.