

TWOSVN LIMITED – PRIVACY POLICY

Twosvn Ltd, also referred to in this document as “we”, “us” or “our”, respects your privacy and is committed to protecting your personal data. This Privacy Policy will inform you as to how we look after your personal data when you visit our website or platforms (together the “Site”) (regardless of where you visit it from) and tells you about your privacy rights and how the law protects you.

Purpose of this Privacy Policy

This Privacy Policy aims to give you information on how Twosvn collects and processes your personal data through your use of the Site, including any data you may provide through the Site.

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

Controller

A controller is a person or organisation who alone or jointly determines the purposes for which and the way any personal data is or is likely to be processed. Unless we notify you otherwise, we are controller of your personal data for the purpose of the Site and where we directly interact with you.

The types of personal data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed. This is known as anonymised data.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, title, job title.
- **Contact Data** includes work 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 products and services 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 and other technology on the devices you use to access the Site.

- **Usage Data** includes information about how you use our Site and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

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.

How is your personal data collected?

We use different methods to collect data from and about you including:

- **Directly from you:** You may give us your personal data in your direct interactions with us. Such personal data includes Identity Data, Contact Data, Financial Data, Profile Data, Usage Data, Technical Data, Marketing and Communications Data by: (i) filling in forms on our Site; (ii) giving us feedback or contacting us; (iii) communicating with us by email, phone or by post; (iv) creating an account on our Site; (v) applying for or subscribing to our services; (vi) requesting that marketing information be sent to you.
- **Automated technologies or interactions.** As you interact with our Site, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.
- **Third-party or publicly available sources:** We will receive personal data about you from various third parties such as analytics providers such as Google based outside the UK.

Providing personal data

Where we need to collect personal data by law or under the terms of a contract we have with you and you do not provide that information when requested we may not be able to perform the contract we have or are trying to enter into with you for example to provide you with our services. In this case we may have to cancel our service, but we will notify you if this is the case at the time.

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you or your organisation.
- 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 obligation.

We do not generally rely on consent as a legal basis for processing your personal data, although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
For the provision of our services to you	(a) Identity (b) Contact	Performance of a contract with you or your organisation
To respond to any enquires	(a) Identity (b) Contact	(a) Performance of a contract with you or your organisation (b) Necessary for our legitimate interests
To process and deliver our services to you including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you or your organisation (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or Privacy Policy	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you or your organisation (b) Necessary to comply with a legal obligation

(b) Asking you to leave a review or take a survey	(d) Marketing and Communications	(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and the Site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of 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 fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant Site 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 Site, 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 Site updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about our services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

We may send you marketing communications. You have the right to object to processing of your personal data for direct marketing purposes. You can unsubscribe from receiving marketing communications from us by using the unsubscribe methods contained in communications we send to you or by contacting us. See the [Contact us](#) section below.

Where you opt out of receiving marketing communications this will not apply to personal data provided to us as a result of registering for or using our service, your service experience or other interactions with the Site.

Sharing your personal data

We may share your personal data with the parties set out below for the purposes set out in the table above.

- Service providers acting as processors who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

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 and process your personal data outside of the United Kingdom/European Union to countries where data protection laws are less stringent than those in the UK/EU.

When we transfer your personal data outside of the UK/ EU we only do so to entities that offer our users the same level of data protection as that afforded by the UK Data Protection Act 2018, UK GDPR and the EU GDPR.

1. We will only transfer your personal information to countries that have been deemed to provide an adequate level of protection for personal information.

2. We will use specific contracts approved for use in the UK or EU which give personal information the same protection it has in the UK/EU.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

The transmission of information via the internet is not completely secure. Although we will take reasonable measures to protect your personal data, we cannot guarantee the security of your information transmitted and any transmission is at your own risk.

Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal information 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, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact and Identity) for six years after they cease being customers for tax purposes.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Not all rights are absolute and will depend on certain circumstances. You can:

Request access to your personal data: This is known as a "data subject access request" and enables you to receive a copy of the personal data we hold about you and check that we are lawfully processing it.

Request correction of your personal data: This enables you to have any incomplete or inaccurate information 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: This enables you to ask us to delete or remove personal data where there is no good reason 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 information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure 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: This is where we are processing your personal data based on a legitimate interest or those of a third party and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms._

Request restriction of processing your personal information: This enables you to ask us to suspend the processing of your personal data in the following scenarios: (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 data but we need to verify whether we have overriding legitimate grounds to use it.

Request transfer of your personal information: 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 automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Right to withdraw consent at any time: This is 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. Depending on the processing activity, if you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

Automated decision making: This is where decisions are made about you by automated means. We do not carry out automated decision making.

Carrying out your data subject rights

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.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (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.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Changes

We may update this Privacy Policy from time to time in order to reflect changes to our practices or for other operational, legal or regulatory reasons. We will take appropriate measures to inform you when we update our Privacy Policy. We will obtain your consent to any material privacy notice changes if and where this is required by applicable data protection laws. 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.

Concerns and complaints

We would appreciate the chance to deal with your concerns in the first instance. Please see the [Contact us](#) section below. If you have unresolved concerns and you live or work in the UK or believe that a personal data breach happened in the UK you have the right to complain at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).

If you live or work outside the UK or you have a complaint concerning our personal data processing activities you may lodge a complaint with another supervisory authority.

Contact us

For more information about our privacy practices, if you have questions or if you would like to make a complaint, please contact us by email at [\[insert contact email address\]](#).

This Privacy Policy was last updated in July 2025.