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**HYPERVINE LIMITED  
WEBSITE PRIVACY POLICY**

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**BACKGROUND:**

Hypervine Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, <http://hypervine.io/> (“Our Site”) and will only collect and use personal data in ways that are described here, and in a way that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

**1. Definitions and Interpretation**

In this Policy the following terms shall have the following meanings:

<b>“Cookie”</b>	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in Part 14, below; and
<b>“Cookie Law”</b>	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;
<b>“We/Us/Our”</b>	means <b>HYPERVINE LIMITED</b> , a company registered in Scotland under number SC596608, whose registered office is at C/O Lindsays, 100 Queen Street, Glasgow, United Kingdom, G1 3DN.

**2. Information About Us**

Our Site is owned and operated by Us.

Our Data Protection Officer is: Chief Technology Officer.

Email address: [data@hypervine.io](mailto:data@hypervine.io).

Postal address: C/O Lindsays 100 Queen Street, Glasgow, G1 3DN

**3. What Does This Policy Cover?**

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

**4. What Is Personal Data?**

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) and the Data Protection Act 2018 (collectively, “the Data

Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

## 5. **What Are My Rights?**

Under the Data Protection Legislation, you have the following rights, which We will always work to uphold:

- a) The right to be informed about Our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact Us to find out more or to ask any questions using the details in Part 15.
- b) The right to access the personal data We hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by Us is inaccurate or incomplete. Please contact Us using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask Us to delete or otherwise dispose of any of your personal data that We hold. Please contact Us using the details in Part 15 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to Us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if We are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to Us directly, We are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask Us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling.

For more information about Our use of your personal data or exercising your rights as outlined above, please contact Us using the details provided in Part 15.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data We hold about you changes, please keep Us informed as long as We have that data.

Further information about your rights can also be obtained from the Information Commissioner’s Office or your local Citizens Advice Bureau.

If you have any cause for complaint about Our use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office. We would welcome the opportunity to resolve your concerns Ourselves, however, so please contact Us first, using the details in Part 15.

## 6. What Data Do You Collect and How?

Depending upon your use of Our Site, We may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. Please also see Part 14 for more information about Our use of Cookies and similar technologies.

Data Collected
Identity Information including name, title, date of birth
Contact information including. Email, telephone, address
Business information including business name, job title, business address
Profile information including preferences, interests, purchase history
Technical information including IP address, browser, version, OS
Data from third parties including technical information, contact information

## 7. How Do You Use My Personal Data?

7.1 Under the Data Protection Legislation, We must always have a lawful basis for using personal data. The following table describes how We may use your personal data, and Our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Providing and managing your access to Our Site.	name, title, date of birth, metadata	To allow legitimate access and usage of the site .
Personalising and tailoring your experience on Our Site.	preferences and interests, metadata	To tailor the site experience to your needs.
Administering Our Site.	preferences and interests, metadata	To tailor the site experience to your needs..
Administering Our business.	metadata	To allow us to operate our website in a useful and functional way .
Personalising and tailoring Our products <b>AND</b> services for you.	IP address, browser type, OS, metadata	To make our products and services more relevant to your needs.
Communicating with you.	email, address, telephone number, metadata	To contact you.
Supplying you with information by email <b>or</b> post that you have opted-in-to (you may opt-out at any time by selecting unsubscribe from the site preferences	email, address, telephone number. metadata	To contact you about our services.

7.2 With your permission and/or where permitted by law, We may also use your

personal data for marketing purposes, which may include contacting you by email, telephone, text message, post with information, news, and offers on Our products services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with Our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

- 7.3 Third Parties whose content appears on Our Site may use third-party Cookies, as detailed below in Part 14. Please refer to Part 14 for more information on controlling cookies. Please note that We do not control the activities of such third parties, nor the data that they collect and use themselves, and We advise you to check the privacy policies of any such third parties.
- 7.4 We use the following automated system[s] for carrying out certain kinds of decision-making **AND** profiling. If at any point you wish to query any action that We take on the basis of this or wish to request 'human intervention' (i.e. have someone review the action themselves, rather than relying only on the automated method), the Data Protection Legislation gives you the right to do so. Please contact Us to find out more using the details in Part 15.
- 7.5 The following automated decision-making method(s) may be used:
  - Google analytics, Google Adwords, Mailchimp .
- 7.6 The following automated profiling may take place:
  - Google analytics, Google Adwords, Mailchimp .
- 7.7 We will only use your personal data for the purpose(s) for which it was originally collected unless We reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If We do use your personal data in this way and you wish Us to explain how the new purpose is compatible with the original, please contact Us using the details in Part 15.
- 7.8 If We need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, We will inform you and explain the legal basis which allows Us to do so.
- 7.9 In some circumstances, where permitted or required by law, We may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

## 8. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long We Keep It
Identity Information including name, title, date of birth	3 years

[Contact information including email, address, telephone number	3 years
Business information including business name, job title	3 years
Profile information including preferences and interests	3 years
Technical information including IP address, browser type, OS	3 years

**9. How and Where Do You Store or Transfer My Personal Data?**

9.1 We will store or transfer some of your personal data within the UK. This means that it will be fully protected under the Data Protection Legislation.

**AND/OR**

We will only store or transfer some of your personal data within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the Data Protection Legislation, GDPR, and/or to equivalent standards by law.

**AND**

We may store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the “EEA” consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as “third countries” and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that We will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

[We share your data within the group of companies of which We are a part. Where this involves the transfer of personal data outside the EEA, Our group ensures that personal data is protected by requiring all companies within the group to follow the same rules with respect to personal data usage. These are known as “binding corporate rules”. More information on binding corporate rules is available from the [European Commission](#).]

**AND**

We share your data with external third parties, as detailed below in Part 10, that are based outside of the EEA. The following safeguards are applied to such transfers:

We will only transfer your personal data to third countries whose levels of data protection are deemed ‘adequate’ by the European Commission. More information is available from the [European Commission](#).

**AND**

We use specific contracts with external third parties that are approved by the European Commission for the transfer of personal data to third countries. These

contracts require the same levels of personal data protection that would apply under the Data Protection Legislation. More information is available from the [European Commission](#).

**AND**

Where We transfer your data to a third party based in the US, the data may be protected if they are part of the EU-US Privacy Shield. This requires that third party to provide data protection to standards similar to those in Europe. More information is available from the [European Commission](#).

9.2 Please contact Us using the details below in Part 15 for further information about the particular data protection mechanisms used by Us when transferring your personal data to a third country.

9.3 The security of your personal data is essential to Us and to protect your data, We take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner’s Office where We are legally required to do so;

**10. Do You Share My Personal Data?**

10.1 We will not share any of your personal data with any third parties for any purposes, subject to the following exception[s].

10.2 If We sell, transfer, or merge parts of Our business or assets, your personal data may be transferred to a third party. Any new owner of Our business may continue to use your personal data in the same way(s) that We have used it, as specified in this Privacy Policy.

10.3 In some limited circumstances, We may be legally required to share certain personal data, which might include yours, if We are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10.4 We may share your personal data with other companies in Our group for improving products or showing customers products they maybe interested in. This includes subsidiaries **AND/OR** Our holding company and its subsidiaries.

10.5 We may sometimes contract with the following third parties to supply certain products **AND/OR** services.

Recipient	Activity Carried Out	Sector	Location
Azure, data storage	Storing data	Data service provider	UK
AWS, data storage	Storing data	Data service provider	UK
Microsoft, processing	Data processing	Data service provider	UK
Google, processing	Data processing	Data service provider	UK
Google, data storage	Storing data	Data service provider	UK

IBM, Data processing	Data processing	Data service provider	UK
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- 10.6 If any of your personal data is shared with a third party, as described above, We will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, Our obligations, and the third party's obligations under the law, as described above in Part 9.
- 10.7 If any personal data is transferred outside of the EEA, We will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 9.
- 10.8 If We sell, transfer, or merge parts of Our business or assets, your personal data may be transferred to a third party. Any new owner of Our business may continue to use your personal data in the same way(s) that We have used it, as specified in this Privacy Policy.

## 11. How Can I Control My Personal Data?

- 11.1 In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via Our Site, you may be given options to restrict Our use of your personal data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails
- 11.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

## 12. Can I Withhold Information?

- 12.1 You may access certain areas of Our Site without providing any personal data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.
- 12.2 You may restrict Our use of Cookies. For more information, see Part 14.

## 13. How Can I Access My Personal Data?

- 13.1 If you want to know what personal data We have about you, you can ask Us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".
- 13.2 All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15.
- 13.3 There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover Our administrative costs in responding.

13.4 We will respond to your subject access request within 30 days and, in any case, not more than one month of receiving it. Normally, We aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date We receive your request. You will be kept fully informed of Our progress.

#### 14. **How Do I Contact You?**

To contact Us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: [data@hypervine.io](mailto:data@hypervine.io).

Postal address: C/O Lindsays 100 Queen Street, Glasgow, G1 3DN

#### 15. **Changes to this Privacy Policy**

15.1 We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if We change Our business in a way that affects personal data protection.

15.2 Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on 01 August 2019.