

PRIVACY POLICY

FORTIUS PRIVACY NOTICE

Fortius Limited (“Fortius”, “we”, “our” or “us”) based at Midpoint, Alencon Link, Basingstoke, Hampshire RG21 7PP (company number: 11188766) is responsible for your personal data and we take our data protection and privacy responsibilities seriously. This privacy notice explains how we collect, use and share personal data in the course of our business activities, as well as your use of our website <https://www.fortius-network.com>, including:

- What personal data we collect and when and why we use it
- How we share personal data within Fortius, with our service providers, regulators and other third parties
- Explaining more about Direct Marketing, Profiling, and Automated Decision Making
- Transferring personal data globally
- How we protect and store personal data
- Cookies
- Legal rights available to help manage your privacy
- How you can contact us for more support
- Updates

We may amend this privacy notice from time to time to keep it up to date with legal requirements and the way we operate our business, and will place any updates on this webpage, <https://www.fortius-network.com/privacy> Please regularly check these pages for the latest version of this notice. If we make fundamental changes to this privacy notice, we will seek to inform you by notice on our website or email.

THIRD PARTY WEBSITES

You might find external links to third party websites on our website. This privacy notice does not apply to your use of a third-party site.

WHAT PERSONAL DATA WE COLLECT AND WHEN AND WHY WE USE IT

In this section you can find out more about

- The types of personal data we collect
- When we collect personal data
- How we use personal data
- The legal basis for using personal data

WHEN WE COLLECT INFORMATION

We collect information about you if you:

- Register to receive information using our contact us pages; collectively (“you”).

PERSONAL DATA WE COLLECT AND USE IF YOU/YOUR COMPANY REGISTER(S)

We receive and process the following information about you:

- Personal details: e.g. contact name (including title, first, middle and surname), job title/role, work/residential address, business/personal email, work/home telephone number and mobile number for your business;
- Employment details; e.g. Name, company address, email, and telephone number of your company directors and executive officers;
- You have the option on certain pages within our sites to submit personal information to us in order that we might send you further information or email alerts.

We collect your personal data in order to register you/your company for additional information on our company.

We may also use your personal data to establish, exercise or defend our legal rights.

LEGAL BASIS FOR USING YOUR PERSONAL DATA

We will only collect, use and share your personal data where we are satisfied that we have an appropriate legal basis to do this. This may be because:

- We need to use your personal data to perform a contract or take steps to enter into a contract with you. For example, we need your personal data to provide you/ your company with information relating to our company.
- We need to use your personal data for our legitimate interest as a commercial organisation. For example, we collect certain of personal data if you browse our website so that we can appropriately administer and continue to improve our website, including troubleshooting, data/ statistical analysis, testing and research.
- We need to collect and use your personal data in order to provide support for any services we supply to you. This includes but is not limited to receipt of phone calls to our service desk, call recording for training and monitoring purposes, handling of complaints and issues where required.

In all such cases, we will look after your information at all times in a way that is proportionate and respects your privacy rights and you have a right to object to processing as explained in the Legal Rights section below;

- We have your consent through our contract to provide services to you to using your personal data for an activity. For example, sending marketing emails to you as part of campaigns.

If you would like to find out more about the legal basis for which we process personal data, please contact us at GDPR.fortius-network.com

SHARING PERSONAL DATA WITH OTHERS

In this section you can find out more about how we share personal data:

- Within Company
- With third parties that help us provide our products and services; and
- Government organisations and agencies, law enforcement and regulators

We share your personal data in the manner and for the purposes described below:

- With other companies within our group where such disclosure is necessary to provide you with our products or services. A list of the other companies in our group can be found on our website [here](#)
- With third parties who help manage our business and deliver services. These third parties have agreed to confidentiality restrictions and use any personal data we share with them or which they collect on our behalf solely for the purpose of providing the contracted service to us. These include IT service providers who help manage our IT and back office systems and those who provide third party hosting facilities;
- With government organisations and agencies, law enforcement, regulators, which may include the Information Commissioner's Office, to comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies;
- Banks and payment providers to authorise and complete payments
- With credit reference agencies and organisations working to prevent fraud;
- We may share in aggregate, statistical form,

non personal data regarding the visitors to our website, traffic patterns, and website usage with our partners, affiliates or advertisers

If, in the future, we sell or transfer some or all of our business or assets to a third party, we may disclose information to a potential or actual third party purchaser of our business or assets.

EXPLAINING MORE ABOUT DIRECT MARKETING, PROFILING AND AUTOMATED DECISION MAKING

In this section you can find out more about:

- How we use personal data to keep you up to date with our products and services
- How you can manage your marketing preferences

HOW WE USE PERSONAL DATA TO KEEP YOU UP TO DATE WITH OUR PRODUCTS AND SERVICES

We may use personal data to let you know about our products and services that we believe will be of interest to you. We may contact you by email, post, or telephone or through other communication channels that we think you may find helpful. In all cases, we will respect your preferences for how you would like us to manage marketing activity with you.

HOW YOU CAN MANAGE YOUR MARKETING PREFERENCES

To protect privacy rights and to ensure you have control over how we manage marketing with you:

- We will take steps to limit direct marketing to a reasonable and proportionate level and only send you communications which we believe may be of interest or relevance to you;

- At any time, you can update or correct your personal profile, or change your preferences for the way in which you would like us to communicate with you, including how you receive details of latest offers or news updates from us;
- If you have an online account with us, the easiest way to make updates to your marketing preferences and/or change your personal details is to log onto your account. You can also click the “unsubscribe” link that you find on any online newsletters you receive or contact our customer support team at hello@Fortius-network.com;
- You can ask us to stop direct marketing at any time you can ask us to stop sending email marketing, by following the “unsubscribe” link you will find on all the email marketing messages we send you. Alternatively, you can contact us at hello@Fortius-network.com. Please specify whether you would like us to stop all forms of marketing or just a particular type (e.g. email); and
- You can change the way your browser manages cookies, which may be used to deliver online advertising, by contacting us for information relating to this please visit our [Cookie policy](#).

We recommend you routinely review the privacy notices and preference settings that are available to you on any social media platforms as well as your preferences within your account with us.

HOW WE PROTECT AND STORE YOUR INFORMATION

SECURITY

We have implemented and maintain appropriate technical and organisational security measures, policies and procedures designed to reduce the risk of accidental destruction or loss, or the unauthorised disclosure or access to such information appropriate to the nature of the information concerned.

Measures we take include:

- Placing confidentiality requirements on our staff members and service providers;
- Destroying or permanently anonymising personal data if it is no longer needed for the purposes for which it was collected;
- Following strict security procedures in the storage and disclosure of your personal data to prevent unauthorised access to it;
- Using secure communication transmission software (known as “secure sockets layer” or “SSL”) that encrypts all information you input on our website before it is sent to us. SSL is an industry standard encryption protocol, and this ensure that the information is reasonably protected against unauthorised interception.
- Using security policies, procedures and auditing across our group companies to ensure security practices are deployed and can be evidenced

As the security of information depends in part on the security of the computer you use to communicate with us and the security you use to protect User IDs and passwords, please take appropriate measures to protect this information.

STORING YOUR PERSONAL DATA

We will store your personal data for as long as is reasonably necessary for the purposes for which it was collected, as explained in this privacy notice. Where your information is no longer needed, we will ensure that it is disposed of in a secure manner. In some circumstances we may store your personal data for longer periods of time, for instance where we are required to do so in accordance with legal, regulatory, tax, accounting requirements.

In specific circumstances we may store your personal data for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal data or dealings.

COOKIES

A cookie is a small text file containing small amounts of information which is downloaded to / stored on your computer (or other internet enabled devices, such as a smartphone or tablet) when you visit a website.

Cookies may collect personal data about you. Cookies help us remember information about your visit to our website, like your country, language and other settings. Cookies allow us to understand who has seen which webpages, to determine how frequently particular pages are visited and to determine the most popular areas of our website. They can also help us to operate our website more efficiently, make your next visit easier and do various other things.

For more information about how our cookies work and information about how to manage your cookie settings, please visit our [Cookie Policy](#).

LEGAL RIGHTS AVAILABLE TO HELP MANAGE YOUR PRIVACY

Subject to certain exemptions, and in some cases dependent upon the processing activity we are undertaking, you have certain rights in relation to your personal data. These rights are explained further below.

- To access personal data
- To rectify / erase personal data
- To restrict the processing of your personal data
- To transfer your personal data
- To object to the processing of personal data
- To object to how we use your personal data for direct marketing purposes
- To obtain a copy of personal data safeguards used for transfers outside your jurisdiction
- To lodge a complaint with your local supervisory authority

If you wish to access any of the above mentioned rights, we may ask you for additional information to confirm your identity and for security purposes, in particular before disclosing personal data to you. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

You can exercise your rights by contacting us. Subject to legal and other permissible considerations, we will make every reasonable effort to honour your request promptly or inform you if we require further information in order to fulfil your request.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

RIGHT TO ACCESS PERSONAL DATA

You have a right to request that we provide you with a copy of your personal data that we hold and you have the right to be informed of; (a) the source of your personal data; (b) the purposes, legal basis and methods of processing; (c) the data controller's identity; and (d) the entities or categories of entities to whom your personal data may be transferred.

RIGHT TO RECTIFY OR ERASE PERSONAL DATA

You have a right to request that we rectify inaccurate personal data. We may seek to verify the accuracy of the personal data before rectifying it.

You can also request that we erase your personal data in limited circumstances where:

- It is no longer needed for the purposes for which it was collected; or
- You have withdrawn your consent (where the data processing was based on consent); or
- Following a successful right to object (see right to object); or
- It has been processed unlawfully; or
- To comply with a legal obligation to which the Company is subject.

We are not required to comply with your request to erase personal data if the processing of your personal data is necessary:

- For compliance with a legal obligation; or
- For the establishment, exercise or defence of legal claims;

RIGHT TO RESTRICT THE PROCESSING OF YOUR PERSONAL DATA

You can ask us to restrict your personal data, but only where:

- Its accuracy is contested, to allow us to verify its accuracy; or
- The processing is unlawful, but you do not want it erased; or
- It is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or
- You have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal data following a request for restriction, where:

- We have your consent; or
- To establish, exercise or defend legal claims; or
- To protect the rights of another natural or legal person.

RIGHT TO TRANSFER YOUR PERSONAL DATA

You can ask us to provide your personal data to you in a structured, commonly used, machine readable format, or you can ask to have it transferred directly to another data controller, but in each case only where:

- The processing is based on your consent or on the performance of a contract with you; and
- The processing is carried out by automated means.

RIGHT TO OBJECT TO THE PROCESSING OF YOUR PERSONAL DATA

You can object to any processing of your personal data which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests.

If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

RIGHT TO OBJECT TO HOW WE USE YOUR PERSONAL DATA FOR DIRECT MARKETING PURPOSES

You can request that we change the manner in which we contact you for marketing purposes.

You can request that we not transfer your personal data to unaffiliated third parties for the purposes of direct marketing or any other purposes.

RIGHT TO OBTAIN A COPY OF PERSONAL DATA SAFEGUARDS USED FOR TRANSFERS OUTSIDE YOUR JURISDICTION

You can ask to obtain a copy of, or reference to, the safeguards under which your personal data is transferred outside of the European Union.

We may redact data transfer agreements to protect commercial terms.

RIGHT TO LODGE A COMPLAINT WITH YOUR LOCAL SUPERVISORY AUTHORITY

You have a right to lodge a complaint with your local supervisory authority if you have concerns about how we are processing your personal data.

We ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time.

CONTACT US

The primary point of contact for all issues arising from this privacy notice is our Head of Customer Experience who can be contacted in the following ways:

Customerexperience@fortius-network.com

or

Fortius, PO Box 6441, Basingstoke,
Hampshire RG21 7FN

If you have any questions, concerns or complaints regarding our compliance with this privacy notice, the information we hold about you or if you wish to exercise your rights, we encourage you to first contact us. We will investigate and attempt to resolve complaints and disputes and make every reasonable effort to honour your wish to exercise your rights as quickly as possible and in any event, within the timescales provided by data protection laws.

TO CONTACT YOUR DATA PROTECTION SUPERVISORY AUTHORITY

You have a right to lodge a complaint with your local data protection supervisory authority (i.e. your place of habitual residence, place or work or place of alleged infringement), which in the UK is the Information Commissioner's Office at any time. We ask that you please attempt to resolve any issues with us before your local supervisory authority.

14th July 2020