



Website Privacy Policy

1. KEY DETAILS

Last Updated: November 28th, 2018

Process Systems Enterprise respects the privacy of our users and has developed this Privacy Policy to demonstrate its commitment to protecting your privacy.

These privacy policies describe to you how Process Systems Enterprise protects and makes use of the information you give the company when you use this website. We encourage you to read this Privacy Policy when using our website or services or transacting business with us. By using our websites or any of our applications, you are accepting the practices described in this Privacy Policy.

If you are asked to provide information when using this website, it will only be used in the way described in this privacy policy.

This policy is updated from time to time, and the latest version is published on this page.

- Summary
- Data Controller
- What and how we use the personal data we collect about you
- How long we retain your information
- How we secure your information
- Transfers of your personal data outside of the European Economic Area (EEA)
- Your rights to your personal data
- Your right to object to the processing of your personal data
- Sensitive personal information
- Changes to our privacy policy
- Additional information

2. SUMMARY

This summary section sets out the summary for this Privacy Policy. Further information about this privacy policy is provided within this privacy policy.

- **Data Controller**
Process Systems Enterprise
- **How we collect or obtain personal data about you**
- When you provide it to us (e.g. contacting us, subscribing to our mailing list, placing an order with

us, attending an event)

- From your use of our website (e.g. cookies)

- From third-parties

- **Personal data we may collect**

name, business name, business address, IP address, information from cookies, information about your computer or device (device and browser type), how you use our website (pages you have viewed, the time, geographical location from which access our website (based on your IP address at the time)

- **How we use your personal data**

Collecting this data helps us understand what you are looking from the company, enabling us to deliver improved products and services.

Specifically, we may use data for our own internal records, to improve the products and services we provide, to contact you in response to a specific enquiry, to customize the website for you, to send you promotional emails about products, services and other things we might think be relevant to you, to send you promotional mailings or call you about products, services, offers and other things we think might be relevant to you, to contact you via email, telephone, or mail for market research reasons

- **Disclosure of your personal data to third-parties**

Only to the extent necessary to run our business, to our services providers, to fulfil any contracts we enter into with you, and where required by law or to enforce our legal rights.

- **Do we sell your personal data to third-parties (other than the sale or purchase of a business or similar event)**

We do not sell your personal data to third-parties

- **How long we retain your information**

No longer than necessary, except taking into account any legal obligations (e.g. maintaining records for tax purposes), any other legal basis we have for using your information (e.g. consent, performance of a contract with you or our legitimate interests as a business) and certain factors described in the section entitled How long we retain your information.

- **How we secure your information**

Using appropriate physical, technical and organisational measures.

Example: storing on secure servers, encrypting data transfers to or from our servers using secure socket layer (SSL) technology, encrypting payments you make on our website using SSL technology, and only granting access to your information where necessary.

- **Use of cookies**

We use cookies on our website. More information, please read our [cookies policy](#)

- **Transfer of your personal data outside of the European Economic Area (EEA)**

In certain circumstances we may transfer your information outside of the European Economic Area (EEA), including the United States of America. Where we do so, we will ensure appropriate safeguards

are in place.

Example: Where your information is transferred to third-parties outside of the EEA have self-certified themselves as compliant with the EU-US Privacy Shield.

- **Your rights in relation to your personal data**

To access your personal data and to receive information about its use, to have your personal data corrected and/or completed, to have your personal data deleted, to restrict the use of your personal data, to receive your personal data in a portable format, to object to the use of your personal data, to withdraw your consent to the use of your personal data and to complain to a supervisory authority

- **Sensitive personal information**

We do not knowingly or intentionally collect what is commonly known as sensitive personal information. Please do not submit any sensitive personal information about you to us.

3. Data Controller

The data controller in respect of our website is Process Systems Enterprise, a limited company registered in England and Wales (registration number 03307708). The registered office is at 26-28 Hammersmith Grove, 5th-Floor – East, London, W6 7HA, United Kingdom.

You can contact the data controller by emailing dpo@psenterprise.com or alternatively, write to:

Data Protection Officer
Process Systems Enterprise
26-28 Hammersmith Grove
5th Floor – East
London, W6 7HA
United Kingdom

If you have any questions about this policy, please contact the data controller.

4. WHAT AND HOW WE USE THE PERSONAL DATA WE COLLECT ABOUT YOU

This section sets out the personal data we collect, **when you:**

Visit our website

We collect and use information from website visitors in accordance with this section and the section entitled '**Disclosure and additional uses of your personal data**'

- **Web Server Log Information**

We use a third party to host our website. Our website automatically logs the IP address you use to access our website and other Information about your visit.

Example: pages accessed, information requested, the data and time of the request, the source of your access to our website (e.g. the website or URL (link) which referred you to our website), and your browser and operating system.

Our server is located in France.

Use of website server log information for IT security purposes

Our third party hosting provider stores server logs to ensure network and IT security and so that the server and website remain uncompromised. This includes analyzing log files to help identify and prevent unauthorized access to our network, the distribution of malicious code, denial of service attacks, and other cyber-attacks by detecting unusual or suspicious activity.

Unless we are investigating suspicious or potential criminal activity, we do not make, or otherwise allow our website service provider to make any attempt to identify you from the information collected via server logs.

Legal basis for processing: Compliance with legal obligations to which we are subject (Article 6(1)(c) of the General Data Protection Regulation)

Legal obligation: to implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk of our processing of information about individuals. Recording access to our website using server log files is such a measure.

Legal basis for processing: Compliance with legal obligations to which we are subject (Article 6(1)(f) of the General Data Protection Regulation)

Legal obligation: using your information for the purposes of ensuring network and information security.

- **Cookies**

Cookies are data files which are sent from a website to a browser to record information about users for various purposes.

We use cookies, including essential, functional and analytical cookies. For further information on how we use cookies, please read our [cookies policy](#)

Cookies allow website and applications to store your preferences in order to present content, options, or functions that are specific to you. They also enable us to see information like how many people use the website and what pages they visit.

You can use your web browser's cookies settings to determine how our websites uses cookies. If you do not want our website to store cookies on your computer or device, you should set your web browser to refuse cookies. However, please note that doing this may affect how our website functions. Some pages and services may become unavailable to you.

Unless you have changed your browser to refuse cookies, our website will issue cookies when you visit it.

To learn more about cookies and how they are used, visit [All About Cookies](#) or read our [cookies policy](#)

Interact with our website

- **Registering on our website**

When you register and create a MYPSE account on our website, we collect the following information: name, business email, business name, job title and country. We also collect department, division, interests and mailing list if you provide it. If you do not provide the mandatory information by our registration form, you will not be able to register or create an account on our website.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate Interest: registering and administering accounts on our website to provide you access to content updates you have purchased and facilitate the efficient running and operation of our business.

Transfer and storage of your information

The registration information you submit via the registration form on our website will be stored within the European Economic Area (EEA) on our third party hosting provider's servers in France.

Registration has the optional field of being added to our mailing list. These are stored on our systems in the UK and also transferred to our [SaaS](#) CMS, hosted by third-party, Salesforce. If any personal data is transferred outside the European Economic Area (EEA) within the third-party hosting provider's servers, these are located in the United States of America. You can access Salesforce Privacy Policy [here](#) and Compliance's [here](#)

For further information about the safeguards use when your information is transferred outside the European Economic Area (EEA), see our section of the privacy policy below entitled 'Transfers of your information outside of the European Economic Area'.

- **Mailing List**

When you sign-up to our mailing list to receive information about interests, products, services and interests we collect your business email address.

Legal basis for processing: our legitimate interests (Article 6(1)(a) of the General Data Protection Regulation)

Legitimate Interest: you give your consent to us sending you our mailing list by signing up to receive it

Transfer and storage of your information

We use a third party service to both, administer and send out our mailing list, called Dotmailer. You can access their privacy policy [here](#)

Information you submit to subscribe to our mailing lists will be stored within the European Economic Area (EEA) on Dotmailer servers located in Western Europe.

If any information is transferred outside of the European Economic Area (EEA) on Dotmailer servers, these servers are located in the United States of America.

For further information about the safeguards use when your information is transferred outside the

European Economic Area (EEA), see our section of the privacy policy below entitled 'Transfers of your information outside of the European Economic Area'.

- **Careers**

When you apply for a job opportunity or prospective opportunity, we collect the following information: name and email. We also collect your address, phone number and other information if you provide it.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate Interest: responding to enquiries about recruitment and keeping records of correspondence.

Transfer and storage of your information

We use a third party service to administer our recruitment application, called PeopleHR. You can access their privacy policy [here](#)

Information you submit will be stored within the European Economic Area (EEA) on PeopleHR servers located in the United Kingdom.

Contact Us

We collect and use information from individuals who contact us in accordance with this section and the section entitled '**Disclosure and additional uses of your personal data**'

- **Email**

When you send an email to the email address displayed on our website, we collect your email address and any other information you provide in that email (such as your name, telephone numbers and information contained in any signature block in your email)

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate Interest: responding to enquiries and messages we receive and keeping records of correspondence.

Transfer and storage of your information

We host our own email servers to store emails you send us. These email servers are located in the United Kingdom.

- **Contact Form**

When you contact us using our contact form, we collect the following information: name, business name, email and any information you include in the message field. We also collect job title and telephone number if you provide it.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate Interest: responding to enquiries and messages we receive and keeping records of correspondence.

- **Phone**

When you contact us by phone, we collect your phone number and any information provided to us during the conversation with us. We do not record phone calls.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate Interest: responding to enquiries and messages we receive and keeping records of correspondence.

Transfer and storage of your information

Information about your call, such as your phone number and date and time of your call, is processed by our third party telephone service provider and stored in the United Kingdom.

- **Post**

If you contact us by post, we will collect any information you provide to us in any postal communications you send us.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate Interest: responding to enquiries and messages we receive and keeping records of correspondence

Transfer and storage of your information

Information you send us by post is stored in the United Kingdom, or country of the office you have sent postal information to (which might be outside of the European Economic Area).

Technical Support

We collect and use information from individuals who contact us in accordance with this section and the section entitled '**Disclosure and additional uses of your personal data**'

- **Email**

When you send an email to the email address displayed on our website, we collect your email address and any other information you provide in that email (such as your name, telephone numbers and information contained in any signature block in your email)

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate Interest: responding to enquiries and messages we receive and keeping records of correspondence.

Transfer and storage of your information

We host our own email servers to store emails you send us. These email servers are located in the

United Kingdom.

- **Technical Support Form**

When you contact us using our contact form, we collect the following information: name, business name, email and any information you include in the message field. We also other non-personal information of our product and your operating system, if you provide it.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate Interest: responding to enquiries and messages we receive and keeping records of correspondence.

- **Phone**

When you contact us by phone, we collect your phone number and any information provided to us during the conversation with us. We do not record phone calls.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate Interest: responding to enquiries and messages we receive and keeping records of correspondence.

Transfer and storage of your information

Information about your call, such as your phone number and date and time of your call, is processed by our third party telephone service provider and stored in the United Kingdom.

- **Post**

If you contact us by post, we will collect any information you provide to us in any postal communications you send us.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate Interest: responding to enquiries and messages we receive and keeping records of correspondence

Transfer and storage of your information

Information you send us by post is stored in the United Kingdom, or country of the office you have sent postal information to (which might be outside of the European Economic Area).

Place an order on our website

We collect and use information from individuals who place an order on our website in accordance with this section and the section entitles '**Disclosure and additional uses of your personal data**'

- **Information we collect when you place an order**

When you place an order for goods or services on our website, we collect the following mandatory information: name, address (including post code, town/city and country), email.

If you do not provide this information, you will not be able to purchase products or services from our website or enter into a contract with us.

Legal basis for processing: necessary to perform a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: other than phone number and passwords (if logged in), we need the mandatory information collected by our checkout form to establish who the contract is with and to contact you to fulfil our obligations under the contract, including sending you receipts and order confirmations.

Legal basis for processing: our legitimate interests (Article 6(1)(c) of the General Data Protection Regulation)

Legal obligation: other than phone number and passwords (if logged in), we have a legal obligation to issue you with an invoice for the goods and services you purchased from us where you are VAT registered and we require the mandatory information collected by our checkout form for this purpose.

Legal basis for processing: we collect your phone number in our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate interest(s): we collect your password for our legitimate interests in: (1) registering and administering accounts on our website to provide you access to content and updates you have purchased; and (2) to facilitate the efficient running and operation of our business we collect your phone number for our legitimate interest of more easily and effectively contacting you in relation to your order and your account.

- **Marketing communication**

At checkout you may have the option to receive marketing communications from us.

Added to the Mailing list

You can opt-in to receive marketing communication from us in relation to our products and services, event and interests

Legal basis for processing: our legitimate interests (Article 6(1)(a) of the General Data Protection Regulation)

Consent: you give your consent to us sending you information about our products, services, event and interests by signing up to receive such information in accordance with the steps described above.

Transfer and storage of your information

We use a third party service to both, administer and send out our mailing list, called Dotmailer. You can access their privacy policy [here](#)

Information you submit to subscribe to our mailing lists will be stored within the European Economic Area (EEA) on Dotmailer servers located in Western Europe.

If any information is transferred outside of the European Economic Area (EEA) on Dotmailer servers, these servers are located in the United States of America.

For further information about the safeguards use when your information is transferred outside the European Economic Area (EEA), see our section of the privacy policy below entitled 'Transfers of your information outside of the European Economic Area'.

- **Processing your payment**

After you place an order on our website you will need to make payment. In order to process your payment we use a number of third party payment processors, including Paypal and Stripe. Your payment will be processed by the payment provider you choose to process your payment via a payment gateway.

Legal basis for processing: our legitimate interests (Article 6(1)(b) of the General Data Protection Regulation)

Reason why necessary to perform a contract: to fulfil your contractual obligation to pay for the products or services you have ordered from us.

Third party payment processors

The third party payment processors we use all collect, use and process your information, including payment information, in accordance with their privacy policies. You can access their privacy policies via the following links:

[PayPal](#)

[Stripe](#)

We use Drupal Commerce as the ecommerce platform for processing orders on our website. When you place orders on our website, your information will be processed via Drupal Commerce. Drupal Commerce does not collect any information when it processes your order on our site. Drupal's privacy policy can be read [here](#)

Transfer and storage of your information

Paypal may transfer information relating to your transaction and the processing of your transaction outside of the European Economic Area (EEA). Where they do so, they will put appropriate safeguards in place. Paypal's Privacy Policy can be read [here](#)

Stripe may transfer information relating to your transaction and the processing of your transaction outside of the European Economic Area (EEA). Where they do so, they will put appropriate safeguards in place. Stripes Privacy Policy can be read [here](#)

For further information about the safeguards use when your information is transferred outside the European Economic Area (EEA), see our section of the privacy policy below entitled 'Transfers of your information outside of the European Economic Area'

Personal data about you from third-parties

This section sets out how we obtain or collect personal data about you from third-parties.

- **Personal data received from third-parties**

Generally, we do not receive personal data about you from third-parties. The third-parties from which we receive personal data about you will generally include other businesses and clients we work with from time to time who may recommend our services to you. This could be business in any industry, sector, sub-sector or location.

It is also possible that third-parties with whom we have had no prior contact may provide us with information about you.

Personal data we obtain from third-parties will generally be your name and contact details, but will include any additional information about you which they provide us.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation)

Reason why necessary to perform a contract: where a third party has passed on information about you to us (e.g. your name and email address) in order for us to provide services to you, we will process your information in order to take steps at your request to enter into a contract with you and perform a contract with you (as the case may be)

Legal basis for processing: our legitimate interests (Article 6(1)(a) of the General Data Protection Regulation)

Consent: where you have asked that a third party to share information about you with us and the purpose of sharing that information is not related to the performance of a contract or services by us to you, we will process your information on the basis of your consent, which you give by asking the third party in question to pass on your information to us.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate Interest: where a third party has shared information about you with us and you have not consented to the sharing of that information, we will have a legitimate interest in processing that information in certain circumstances.

Example: we would have a legitimate interest in processing your information to perform our obligations under a sub-contract with the third party, where the third party has the main contract with you. Our legitimate interest is the performance of our obligations under our sub-contract.

Similarly, third-parties may pass on information about you to us if you have infringed or potentially infringed any of our legal rights. In this case, we will have a legitimate interest in processing that information to investigate and pursue any such potential infringement.

- **Information obtained by us from third-parties**

In certain circumstances (e.g. to verify the information we hold about you or obtain missing information we require to provide you with a service) we will obtain information about you from certain publicly accessible sources, both EU and non-EU, such as Companies House, online customer databases, business directories, media publications, social media, and websites (including your own website, if you have one). We may do this, if we have insufficient information to be able to contact

you or to better understand your business.

Legal basis for processing: our legitimate interests (Article 6(1)(b) of the General Data Protection Regulation)

Reason why necessary to perform a contract: where you have entered into a contract or requested that we enter into a contract with you, in certain circumstance, we will obtain information about you from public sources in order to enable us to understand your business and provide services to you or services to a sufficient standard.

Example: we would obtain and/or verify your email address from your website or from a directory where you ask us to send you information by email but we do not possess the information or we need to confirm that we have recorded your email address correctly.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate Interest: in certain circumstances, we will have a legitimate interest in obtaining information about you from public and private sources.

Example, if you have infringed or we suspect that you have infringed any of our legal rights, we will have a legitimate interest in obtaining and processing information about you from such sources in order to investigate and pursue any suspected or potential infringement.

Disclosure and additional uses of your personal data

This sets out the circumstances in which we will disclose information about you to third-parties and any additional purposes for which we use your information.

- **Sharing your personal data to services providers**

We use several third party providers to provide us with services which are necessary to run our business, or to assist us with running our business and who process your information for us on our behalf. This includes:

Mailing List provider (USA)

Marketing Survey provider (USA)

IT Service providers and agents (including their sub-contractors). Examples: internet service and platform providers, payment processing providers

Hosting providers (France)

Web Developers (UK)

Telephone providers (UK)

Your information will be shared with these service providers only where necessary to enable us to run our business.

- **Sharing your personal data for legal reasons**

Indicating possible criminal act to the appropriate authorities

If we suspect that criminal or potential criminal activity has occurred, we will in certain circumstances need to contact an appropriate authority (e.g. the police). This could be the case, for instance, we

suspect that a fraud or a cyber-crime has been committed or if we receive threats or malicious communications towards us or third-parties.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate Interest: preventing crime or suspected criminal activity

In connection with the enforcement or potential enforcement our legal rights

We will use your information in connection with the enforcement or potential enforcement of our legal rights, including sharing information with debt collection agencies if you do not pay amounts owed to us when you are contractually obliged to do so. Our legal right may be contractual (where we have entered into a contract with you) or non-contractual (such as legal rights that we have under copyright law or tort law)

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate Interest: enforcing our legal rights and taking steps to enforce our legal rights.

In connection with a legal or potential legal dispute or proceedings

We may need to use your information if we are involved in a dispute with your or a third-party. Example: to resolve a dispute or as part of any mediation, court resolution or similar process.

Legal basis for processing: our legitimate interests (Article 6(1)(c) of the General Data Protection Regulation)

Legal obligation: resolving disputes or potential disputes

Ongoing compliance with laws, regulations and other legal requirements

We will use and process your information in order to comply with legal obligations to which we are subject.

Example: disclosure of your information pursuant to a court order or subpoena if we receive one or to the National Crime Agency in connection with suspected or potential money laundering matters.

Legal basis for processing: our legitimate interests (Article 6(1)(c) of the General Data Protection Regulation)

Legal obligation: legal obligations to disclose information which are part of the laws of England and Wales or if they have been integrated into the United Kingdom's legal framework (e.g. international agreement which the United Kingdom has signed)

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate Interest: where legal obligations are part of the laws of another country and have not been integrated into the United Kingdom's legal framework, we have a legitimate interest in complying with these obligations.

- **Sharing your personal data to other third-parties**

We disclose your information to other third-parties in specific circumstances, as set out below

Google Inc.

Google collects information through our use of Google Analytics on our website. Google uses this information, including IP addresses and information from cookies for a number of purposes, examples: improving its Google analytics service. Information is shared with Google on an aggregated and anonymized basis. Further information about what Google collects, how it uses and controls the information sent to Google, please read the following Google [partners page](#) of the Google's privacy policy.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate Interest: meeting our contractual obligations to Google under our [Google Analytics Terms of Service](#)

You can opt-out of Google Analytics by installing the browser plugin [here](#)

Roxr Software Limited (Clicky Web Analytics)

Roxr Software Limited collects information through the use of Clicky Web Analytics on our website. They use this information, including IP addresses and information from cookies for a number of purposes, example: improving its Clicky analytics services. Further information about what Clicky collects, how it uses and controls the information sent can be read on Clicky's [terms](#) page.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate Interest: meeting our contractual obligations to Clicky and allowing Clicky Web Analytics to work on our website.

Sharing your information with a prospective or actual purchaser or seller

In the context of a business or asset sale or acquisition by us, a merger or similar business combination event, whether actual or potential

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate Interest: sharing your information with a prospective purchaser, seller or similar person in order to allow such a transaction to take place.

Sharing your information with third-parties

Sharing your information with third-parties, which are either related to or associated with the running of our business and where it's necessary for us to do so. These third-parties include our accountants, advisors, affiliates, business partners, independent contractors and insurers.

Information on each of these third-parties is set out below.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate Interest: running and managing our business efficiently.

Accountants

We share information with our accountant's for tax purposes.

Example: we share invoices we issue and receive with our accountants for the purpose of completing tax returns and our end of year accounts.

Our accountants are located in the United Kingdom

Advisors

Occasionally, when we obtain advice from advisors, examples: accountants, financial advisors, lawyers, and other specialists. We will share your information with third-parties only where it is necessary to enable these third-parties to be able to provide us with the relevant advice.

Our advisors are located in the United Kingdom

Affiliates

Are individuals or entities we work with to promote our business by various means, including advertise our services on their websites.

Example: Our affiliates can be in any industry, sector or sub-sector. Affiliate will share information with us and we will share information with them where you have expressed an interest in our products or services.

Business partners

We may work with business partners with which provides goods and services which are complementary to our own or which allow us to provide goods or services which we could not provide on our own. We share information with our business partners where you have requested services which they provide whether independently from, or in connection with our own services.

Independent contractors

We use independent contractors (and their sub-contractors) in our business. Your information will be shared with the independent contractors only where it is necessary for them to perform the function we have hired them to perform in relation to our business.

Our independent contractors maybe located outside of the United Kingdom

Insurers

We will share your information with our insurers where it is necessary to do so. Example: in relation to a claim we receive or make or under our general disclosure obligations under our insurance contract with them.

Any third-party to whom we may disclose personal information may have their own privacy policies which describe how they use and disclose personal information. Those policies will govern use, handling and disclosure of your personal information once we have shared it with those third-parties as described in this privacy policy. We encourage you to visit the websites of those third-parties.

These entities or their servers may be located either inside or outside of the European Economic Area (EEA).

5. HOW LONG DO WE RETAIN YOUR PERSONAL DATA

This section sets out how long we retain your information. We have set out specific retention periods, where possible. Where that has not been possible, we have set out the criteria we use to determine the retention period.

- **Specific retention periods**

- Order information

- When you place an order for products and services we retain that information for a minimum period of six years following the end of the financial year in which you have placed your order, in accordance with our legal obligation to keep records for tax purposes under paragraph 6, Schedule 11 of the Value Added Tax Act 1994.

- Correspondence and enquiries

- When you make an enquiry or contact us by email or via our contact form, we will retain your information for as long as it takes to resolve your enquiry, and for twelve (12) further months, after which point we will delete your information.

- Mailing list

- We retain your information you used to sign-up to our mailing list for as long as you remain subscribed (i.e. you do not unsubscribe) or if we decide to cancel our mailing list service, whichever occurs first.

- **Determining the criteria for retention periods**

- In any other circumstances, we will retain your information for no longer than necessary, taking into account the following:

- - the purpose(s) and use of your information both now and in the future. Example: whether it's necessary to continue to store that information in order to continue to perform our obligations under a contract with you or to contact you in the future
 - - Whether we have any legal obligation to continue to process your information. Example: any record-keeping obligations imposed by relevant law or regulation
 - - Whether we have any legal basis to continue to process your information. Example: your consent
 - - How valuable your information is (now and in the future)
 - - any relevant agreed industry practice on how long information should be retained
 - - the levels of risk, cost and liability involved with us continuing to hold the information
 - - how difficult it is to ensure that the information can be kept up-to-date and accurate
 - - any relevant surrounding circumstances. Example: the nature and status of our relationship with you

6. HOW WE SECURE YOUR PERSONAL DATA

The section sets out how we secure your information.

- **Measures taken**

We take appropriate technical and organisational measures to secure your information and to protect it against unauthorised or unlawful use and accidental loss or destruction, including:

- only sharing and providing access to your information to the minimum extent necessary, subject to confidentiality restrictions where appropriate and on an anonymized basis wherever possible.
- using secure servers to store your information.
- verifying the identity of any individual who requests access to information prior to granting them access to information.
- using Secure Sockets layer (SSL) software or other similar encryption technologies to encrypt data transmission between your system and our website. This includes any payment transactions.

- **Information sent by email**

Transmission of information sent over the internet is not entirely secure, and if you submit any information to use over the internet (whether by email, via our website or any other means), you do so entirely at your own risk.

We cannot be responsible for any costs, expenses, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of your decision to transmit information to us by such means.

7. TRANSFERS OF YOUR PERSONAL DATA OUTSIDE OF THE EUROPEAN ECONOMIC AREA (EEA)

Your information will be transferred and stored outside the European Economic Area (EEA) in circumstances set out below.

We will also transfer your information outside the EEA or to an international organization in the unlikely event that we are required to comply with legal obligations to which we are subject (e.g. compliance with a court order). Where we are required to do so, we will ensure appropriate safeguards and protections are in place.

- **Mailing list**

Personal data you submit to us when you sign-up to our mailing list (your email address) might be transferred outside the EEA and stored on our third party mailing list provider's servers. Our third party mailing list provider is Dotmailer. You can access their privacy policy [here](#)

Country of storage

Western Europe Region & United States of America. This country is not subject to an adequacy decision by the European Commission.

Safeguard(s) used

Dotmailer has self-certified its compliance with the EU-US Privacy Shield which is available [here](#)

- **Payment processing**

When you pay for products and services on our site, if you select Paypal or Stripe, information about your order and the processing of your order may be transferred outside of the EEA.

Paypal

Paypal may transfer information they process about your order outside the EEA. Where they do so, they will ensure the appropriate safeguards are in place.

You can access PayPal's privacy policy [here](#)

Stripe

Information processed by Stripe is transferred outside the EEA and stored on Stripe's servers.

You can access Stripe's privacy policy [here](#)

Country of storage

United States of America. This country is not subject to an adequacy decision by the European Commission.

Safeguard(s) used

Safeguards security information can be read [here](#)

8. YOUR RIGHTS TO YOUR PERSONAL DATA

This section sets out your rights to your personal data.

• **Your rights**

Subject to certain limitations on certain rights, you have the following rights in relation to your personal data, which you can exercise by writing to Process System Enterprise, 26-28 Hammersmith Grove, 5th Floor – East, London, W6 7HA, United Kingdom, or emailing dpo@psenterprise.com

- to request access to your information
- to request correction or deletion (of your personal data)
- to request that we restrict use (of your personal data)
- to receive information which you have provided to us in a structured, commonly used and machine-readable format (e.g. CSV file)
- to object to the processing of your personal data for certain purposes (further information, see section Your right to object to the processing of your personal data)
- withdraw your consent to our use of your information

In accordance with Article 77 of the General Data Protection Regulation, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or of an alleged infringement of the General Data Protection Regulation.

For the purpose of the UK, the supervisory authority is the Information Commissioners Office (ICO), the contact details are available [here](#)

- **Information about your rights**

The above rights are provided in summary form only and certain limitations apply to many of these rights. Further information about your rights in relation to your personal data, including any limitations which apply, visit the following pages on the ICO website:

[Guide to the General Data Protection Regulation](#)
[Is my information being handled correctly](#)

You can also find further information about your rights, as well as information on any limitations which apply to those rights, by reading the underlying legalisation contained in Articles 12 to 22 and 34 of the General Data Protection Regulation, available [here](#)

- **Verifying your identity where you request access to your personal data**

Where you request access to your information, we are required by law to use all reasonable measures to verify your identity before doing so.

These measures are designed to protect your information and to reduce the risk of identity fraud, identity theft or general unauthorised access to your information.

How we verify your identity

Where we possess appropriate information about you on file, we will attempt to verify your identity using that information.

If it is not possible to identify you from such information, or if we have insufficient information about you, we may require original or certified copies of certain documentation in order to be able to verify your identity before we are able to provide you with access to your information.

We will only be able to confirm precise information we require to verify your identity in your specific circumstances if and when you make such a request.

9. YOUR RIGHT TO OBJECT TO THE PROCESSING OF YOUR PERSONAL DATA

The section sets out your right to object to the processing of your personal data

- **Your right to object**

You have the following rights in relation to your personal data, which you may exercise by writing to Process Systems Enterprise, 26-28 Hammersmith Grove, 5th Floor – East, London, W6 7HA, United Kingdom or emailing dpo@psenterprise.com

- to object to us using or processing your personal data where we use or process it in order to carry out a task in the public interest or for our legitimate interests, including 'profiling' (analyzing or predicting your behavior based on your information) based on any of these purposes
- to object to us using or processing your personal data for direct marketing purposes (including any profiling we engage in that it is related to such direct marketing).

You may also exercise your rights to object to us using or processing your personal data for direct marketing purposes by:

- **clicking the unsubscribe link** contained at the bottom of any marketing email we send to you and following the instructions which appear in your browser following your clicking on that link
- **sending an email** to marketing@psenterprise.com asking that we stop sending you marketing communications and by including the words 'OPT OUT' within the Subject.
- **if you have a MYPSE account** to uncheck the option of any marketing email we send to you

Information on how to object to our use of information collected from cookies and similar technologies, read our section entitled How to accept or reject cookies in our [cookies policy](#)

10. SENSITIVE PERSONAL DATA

This section sets out the sensitive personal data about an individual.

- **Sensitive personal data is information about an individual that reveals:**
 - race
 - ethnic origin
 - political opinions
 - religion
 - philosophical beliefs
 - trade union membership
 - genetic information
 - biometric information (for the purpose of uniquely identifying an individual)
 - health
 - sexual orientation
- **Our policy on Sensitive personal data**

We do not knowingly or intentionally collect sensitive personal data from individuals, and you must not submit sensitive personal information to us.

However, if you inadvertently, or intentionally transmit sensitive personal information to us, you will be considered to have explicitly consented to us processing that sensitive personal information under Article 9(2)(a) of the General Data Protection Regulation.

Legal basis for processing: our legitimate interests (Article 6(1)(c) of the General Data Protection Regulation)

Consent: for the purpose of processing your sensitive personal information of deleting it.

11. CHANGES TO OUR PRIVACY POLICY

This section sets out the changes to our privacy policy.

- **Minor changes to our privacy policy**

Where we make minor changes to our Privacy policy, we will update our privacy policy with a new effective date stated at the beginning of it. Our processing of your information will be governed by the practices set out in the new version from its effective date onwards.

- **Major changes to our Privacy Policy**

Where we make major changes to our Privacy policy, or intend to use your information for a new purpose or a different purpose than the purpose for which we originally collect it, we will notify you by email (where possible) or by posting a notice on our website.

We will provide you with the information about the change in question and the purpose and any other relevant information before we use your information for that new purpose.

Wherever required, we will obtain your prior consent before using your information for a purpose that is different from the purposes for which we originally collect it.

12. ADDITIONAL INFORMATION

This section sets out additional information to this privacy policy.

- **Children's privacy**

We do not knowingly contact or collect information from persons under the age of 18. The website is not intended to solicit information of any kind from persons under the age of 18.

It is possible that we could receive information pertaining to a person under the age of 18 by fraud or deception of a third party. If we are notified of this, after verification, we will delete the information from our systems.

If you would like to notify us of our receipt of information about persons under the age of 18 then please send us an email to dpo@psenterprise.com

- **No rights of third-parties**

This privacy policy does not create rights enforceable by third-parties or require disclosure of any personal information relating to the users of the website.

- **Other websites this policy applies**

This policy applies to the following web domains

.psenterprise.com

.psepath.com

.sbpalliance.org

.foodcoe.com