

# Nematrian Privacy Policy

[Nematrian website page: [PrivacyPolicy](#), © Nematrian 2015]



Nematrian

## Privacy Policy

Nematrian Limited (company number 06908852) (and all Trading Styles) ("we" or "us") recognises that your privacy is important. This Privacy Policy applies to all of the software and associated services (collectively "Services") that are provided by us, mainly via the Nematrian website. Specific consultancy projects undertaken by us may be subject to different confidentiality criteria including ones derived from relevant legislation relating to the consultancy services provided by us to such clients.

***Please read this Privacy Policy carefully as once you use our Services you will be regarded as having read and accepted this Privacy Policy. You must not use our website or our Services if you do not accept this Privacy Policy.***

If you have any questions about this Privacy Policy, please feel free to contact us by writing to us at:

Privacy Officer  
Nematrian Limited  
c/o Unit 24, Capital Business Centre  
22 Carlton Road  
South Croydon  
Surrey CR2 0BS  
United Kingdom

### Information that we may collect and how we may use it

**(i) Log information.** Nematrian's servers may automatically record some information each time you visit our website or use some of our services, e.g. the URL, IP address, browser type and language and the date and time of your request.

**(ii) Cookies.** We may use cookies and other similar technologies to enhance your online experience and to learn about how you use our services. This can help us improve the quality of the services that we offer you. Cookies are small files containing strings of characters that are sent by a website to your computer or other device that uniquely identify your browser to the site in question. For further information, refer to "Cookies" (below).

**(iii) Information that you provide.** We may collect information on you when you register, log in to our site or at other times when you volunteer such information. We may alter the extent of access that we give you to our Services depending on how reliable we think that the information you have provided is likely to be.

**(iv) Links.** We may present links in a format that enables us to keep track of whether these links have been followed.

**(v) Affiliates.** We may provide web services that route your requests to other companies' software and websites and return back to you responses received from these third-party sites and servers. These affiliates may collate further information specific to your use of their services.

**(vi) Other sites.** This Policy applies to Nematrian services only. We do not exercise control over third

party sites to which there may be links on Nematrian website pages.

### **Information that others may collect via your use of the Nematrian website**

If a webpage that you visit includes third party advertisements then third parties may be placing and reading cookies on your browser, or using web beacons to collect information as a result of ad serving on the Nematrian website.

### **Current Practice**

We may store log information as per (i) to allow us to understand better our aggregate user base. We may also associate this information with information that you provide as per (ii), (iii) and (iv)

If your browser permits them, we use cookies to facilitate your seamless navigation between pages on the Nematrian website. We may use cookies with defined expiry times which may thus reside on your hard disk until you delete them. We may associate these cookies with information collected via (i), (iii) and (iv), bearing in mind that any particular computer, device or browser instance is not necessarily always used by the same individual.

We store and retain information that you provide as per (iii). This may include answers you provide to 'profiling' questions if any when registering or logging into the website and at other times. Some of these questions may be generic and some may be requested by advertisers so that they are better able to provide advertisements relevant to you.

The information collated as above may include "personal" information (including "sensitive personal" information), as defined below. "Personal information" is information that you provide us which personally identifies you, such as your name, email address, telephone number or billing information, or other data which can reasonably be linked to such information by us.

Users wanting to store information permanently on the Nematrian website and make this information available to others generally need to provide us with an e-mail address and potentially other "personal" information, so that we can identify and notify them if we discover that the material they are then serving to third parties is potentially objectionable or involves potentially inappropriate use of other people's intellectual property.

Pages that include Google AdSense for content ads make use of the DoubleClick DART cookie. Data collated via this cookie may be used for various purposes by Google, see <http://www.google.com>. Other ad serving services used by the Nematrian website may use similar types of cookies.

We will place appropriate notices on the Nematrian website if these practices changes.

### **Uses**

We may use information on you collated as above to provide the services you have requested, and to provide services that display customised content and advertising.

We may also use such information for auditing, research and analysis to operate and improve Nematrian technologies and services.

We may share "aggregated non-personal information" with third parties outside Nematrian. "Aggregated non-personal information" means information that groups together users and their site

usage characteristics according to their responses to one or more of the profiling questions described above (or other user characteristics available to us), but does not reveal individual Users or User ID's (or provide such a high level of granularity that others can infer with a high likelihood who might be the specific individual in question).

If you have indicated that you are happy for us to do so, we may share information on you collated as above with selected third parties and/or use this information to send you unsolicited e-mail or physical mail.

We may also share information with suitably authorised representatives of law enforcement agencies or financial regulatory bodies, if reasonably requested to do so, and with others if required by law to do so. In this context, please bear in mind that we may process personal information on servers in different countries and may therefore be required to submit to requests for such information that might be deemed appropriate in some jurisdictions but not in others. Please also bear in mind that as a result of anti-terrorism, crime and money laundering legislation, we may be required by law to obtain satisfactory evidence of the identity of our customers. We may also be obliged to disclose knowledge or suspicion of money laundering or terrorist activities or dealing with proceeds of crime and in particular circumstances that obligation will override other duties of confidentiality we might implicitly or expressly be subject to. Moreover, we may not be permitted to inform our customers that we have made such a disclosure or the reasons for it.

### **Choices**

You may decline to provide personal information to us (e.g. by declining to answer a specific profiling question or providing a random answer to the question) and/or refuse cookies in your browser, although some of the features of our services may not function properly as a result, or the quality of service you may receive may be diminished in some other way.

We will make good faith efforts to provide you access to your personal information upon request and to let you correct such data if it is inaccurate and delete it, when reasonably possible.

We will not collect or use "sensitive personal" information for purposes other than those described in this Privacy Policy and/or in supplementary notices, unless we have obtained your prior consent. "Sensitive personal" information includes information we know to be related to confidential medical information, racial or ethnic origins, political or religious beliefs or sexuality and tied to personal information.

### **Corporate restructuring**

Should we set up wholly or largely owned subsidiaries then the privacy policy set out above will apply to the Nematrian group collectively. Should we be taken over by another company (or should one of our subsidiaries be sold, or we to cease to have control over that subsidiary) then we will place appropriate notices on the Nematrian website notifying you of changes if any to the applicable privacy policy.

Unless otherwise agreed with you, you will be given the opportunity not to have personal information on you held by us or one of our subsidiaries, other than relevant billing information, transferred to another company.

### **Electronic Communications**

When you agree to receive any electronic communications from us, you also agree to receive additional communications on products and services which we believe you may be interested in. Any electronic communications we send you will include clear and concise instructions to follow should you wish to unsubscribe at any time.

### **Third party providers and data privacy**

If you decide to enter into a contract with a third party provider through a channel on our website, the information you have provided to us together with any further information requested by, and supplied by you to, the third party provider will be held by the provider for the purposes set out in that provider's privacy policy. Therefore, you are strongly advised to read your chosen provider's privacy policy and satisfy yourself as to the purposes for which the provider will use your personal information before entering into the contract. We have no responsibility for the uses to which a provider puts your personal information once you have contracted with that provider.

### **Advertisements**

The advertisements that you see displayed on this website may be delivered on our behalf by a third party advertising company. In such circumstances, no personal information will be used during the course of serving these advertising unless you have separately supplied such information to the third-party advertiser. However, on our behalf, such a third-party advertiser may place or recognize a unique cookie on your browser.

### **Security**

Keeping information about you secure is very important to us. However, no data transmission over the internet can be guaranteed to be totally secure. As a result, whilst we strive to protect your personal information, we cannot ensure or warrant the security of any information which you send to us, and you do so at your own risk. If during log-in you are redirected to a secure Nematrian server (referenced by 'https' in the browser address field) then, where practical, your subsequent interaction with that server during the same site session, including transfer of sensitive information if any, will be encrypted until you log out, to minimise the risk of interception during transit.

### **Cookies**

A cookie is a small text file placed on your computer by a web browser, which has been sent by a web server. It is essentially an 'identification card' relating to you. The main purpose of our cookies is to identify you when you visit our website. Each time your browser requests a web page from our server, the browser sends the information in the text file back to the server and lets the server know that you have returned to that web page. If you do not accept incoming cookies then the performance of our website on your system will not be to full standard or our website may not serve at all.

### **Your Rights**

You have certain rights under the Data Protection Act 1998. For example, we will always let you have a copy of all personal information we have about you should you request it. We may charge you a fee for a copy of such information.

*Version Dated 29 September 2017*