



# Privacy policy

Version 1.0 | 16/06/2022



**AdEPT**

## AdEPT Privacy Policy

At AdEPT we take the security and privacy of your personal data seriously. This document, details how we collect, use and protect the personal data you share with us.

AdEPT may amend this Privacy Policy from time to time. Amended terms will be posted to [www.adept.co.uk/privacy](http://www.adept.co.uk/privacy) and automatically take effect on the date set out in the posted Privacy Policy, unless otherwise specified.

### Who We Are?

This Privacy Policy applies to AdEPT Technology Group plc, a company registered in England and Wales under the Company Number 4682431 and whose Registered Address is:

AdEPT Technology Group plc  
One Fleet Place  
London EC4M 7WS

### Scope of This Privacy Policy

This Privacy Policy applies to personal data collected through our websites as well as by telephone, by email and through related social media platforms.

Our websites and social media activity may provide links to third-party websites for your convenience and information. If you access those links, you will leave the AdEPT Websites and step outside the scope of this policy. This Privacy Policy does not cover any personal data that you choose to give to unrelated third parties. We do not monitor or control the information collected by such sites or the privacy practices of any third parties, and we are not responsible for their practices or the content of their sites.

### Collection Of Personal Data

We collect Personal Data through a variety of different ways and for different purposes. We may use this information for one or more of the following purposes:

- To provide you with information that you have explicitly requested.
- To contact you about the solutions and services in which you have demonstrated interest.
- To fulfil a contract we have with you or with the entity that you represent.
- To send you information about AdEPT solutions and services that may be of interest to you.

If you do not want to receive these promotional messages, you may opt-out when you provide us with contact information or at any time after you register by updating your preferences (see the Opt-Out section below).

In most cases, you provide us with your consent to use your personal data in accordance with this policy by providing us with that information. In some cases, we may specifically ask for your express consent if we believe that the information is either sensitive or our use of the information may include other uses not covered by this Privacy Policy or another privacy notice to which we have made available to you.

## Collection of Technical Information

To ensure that each visitor to our websites can use and navigate the site effectively, AdEPT websites automatically collect technical information about your visit (such as browser type, Internet service provider, platform type, internet protocol (IP) addresses, referring/exit pages, operating system, date/time stamp).

We use third parties to provide information about visitors to our websites. When you visit our website, we will record your IP address. This address will be matched against public and proprietary IP address databases to provide us with information about your visit. This information may identify the organisation to whom the IP address is registered but not individuals. In some limited cases i.e. single person companies, it may be possible to identify personal data from publicly available ICANN data.

Other than the aforementioned ways of obtaining data we may obtain information about you from third party sources, such as public databases, data service companies, social media platforms, third party data providers and our joint marketing partners. We take steps to ensure that such third parties are legally permitted or required to disclose such information to us.

## Cookies

We use cookies to improve your user experience when navigating our websites. Some cookies are required for technical reasons in order for our websites to operate. We refer to these as "essential" or "strictly necessary" cookies. Other cookies also enable us to track and target the interests of our users to enhance the experience on our websites and. This data is used to deliver customised content and promotions within the AdEPT Website to customers whose behaviour indicates that they are interested in a particular subject area. We use the following cookies on our websites:

- Essential website cookies.
- Performance and functionality cookies.
- Analytics and customisation cookies.
- Social networking cookies.

You have the right to decide whether to accept or reject cookies from our website. You can also set or amend your web browser controls to accept or refuse cookies. If you choose to reject cookies, you may still use our website though your access to some functionality and areas of our website may be restricted.

## Your Choices and Opting Out

AdEPT gives you the choice of receiving a variety of information that complements our products and services. You can subscribe to receive certain product-and service-specific information and AdEPT-wide marketing communications. If you are receiving communications from AdEPT, this is either because you have provided us with permission to contact you in the past, or we believe that there is a lawful basis, such as legitimate interest or contractual fulfilment, for us to contact you.

AdEPT-wide communications may include new product information, services and events. AdEPT provides you the opportunity to "opt-out" of having your personal data used for certain purposes when we ask for this information. If you no longer wish to receive our communications, you may opt-out of receiving them by following the instructions included in each communication or by emailing us at [privacy@AdEPT.co.uk](mailto:privacy@AdEPT.co.uk). Please include "Opt-Out" in the subject-line.

## Lawful Basis for the Processing of Personal Data

The table below describes the various forms of personal data we collect and the lawful basis for processing this data. Our business systems and compliance processes mean that all personal data is processed on common, company-wide platforms. We have processes in place to make sure that only those people in our organisation who need to access your data can do so. A number of data elements are collected for multiple purposes, as the table below shows. Some data may be shared with third parties and, where this happens, this is also identified below.

Purpose of collection	Information category	Data collected	Purpose for collection	Lawful basis for processing	Data shared with?	Retention period
<b>1. To provide you with information</b>	Subject matter information	Name, company name, geographic location, email address, business sector.	To provide appropriate online or email information about products and services that you have requested	<b>Contractual fulfilment</b>	Internally only	Maximum 8 years from the date the information is collected.
			To provide further, related, online or email information and ongoing news updates in relation to the identified area of interest.	<b>Legitimate interest</b>	Internally only	
		Telephone number	Follow-up to ensure requested information meets needs and identify further requirements	<b>Legitimate interest</b>	Internally only	
		Personal contact information as provided through website forms or at trade shows or any other means.	General mailing list subscription	<b>Consent</b>	Internally only	
<b>2. Fulfilment information</b>	Fulfilment data	Name, contact details	Licensing details necessary for allocation and maintenance of a licence purchased for use of software and related products.	<b>Contractual performance</b>	Internally and any third parties whose products or services you may have purchased from us.	Maximum 6 years from the date of the performance of the contract.
		Name, address(es), email address, contact details	Actual delivery of products or services, in physical or digital form, that you may have purchased from us.	<b>Contractual performance</b>	Internally and any third-party logistics or supplier companies with whom we contract in order to fulfil these requirements.	
<b>3. Security</b>	Security information	Technical information, as described above, plus any other information that may be required for this purpose	To protect our websites and infrastructure from cyber-attacks or other threats and to report and deal with any illegal acts.	<b>Legitimate interest</b>	Internally, forensic and other organisations with whom we might contract for this purpose.	Relevant statutes of limitation
<b>4. Communications</b>	Contact information	Names, contact details, identification details	To communicate with you about any issue that you raise with us, or which follows from an interaction between us.	<b>Legitimate interest</b>	Internally and, as necessary, with professional advisers.	Relevant statutes of limitation.

When we process personal information on the lawful basis of legitimate interest, we employ a three-part test before determining whether it is appropriate:

- Is there a legitimate interest behind the processing?
- Is the processing necessary for that purpose?
- Is the legitimate interest overridden, or not, by the individual's interests, rights or freedoms?

## Storage of Personal Data

AdEPT is a UK-domiciled organisation whose primary offices are in the UK.

- Our websites are hosted in the EU and are accessed only by our EU-based staff.
- Our IT Service Management, Asset Management, Customer Relationship Management, Marketing and Accounting systems are EU-based.
- We use a range of Cloud Service Providers (CSPs) within our processing environment. Unless stated otherwise, we are, in respect of all these CSPs, the data controller.
- Unless we stated otherwise all CSPs that we use utilise EU-located processing facilities.
- We resell products supplied by organisations outside the EU. This may mean that our resale partners will have access to information about data subjects who purchase their products.
- We operate a data retention policy in respect of all data, whether paper-based or digital and those aspects of it which relate to personal data are contained in the table above.

## Security Measures

Our Information Security Management System (ISMS) is certified to ISO/IEC 27001:2013. We have appropriate security controls in place to protect personal data. Risk assessment, including assessing risks to the rights and freedoms of data subjects, is at the heart of our ISMS. We do not, have any control over what happens between your device and the boundary of our information infrastructure. You should be aware of the many information security risks that exist and take appropriate steps to safeguard your own information. We accept no liability in respect of breaches that occur beyond our sphere of control.

## Your Rights as a Data Subject

As a data subject whose personal information we hold, you have certain rights. You can find details of these rights at the Information Commissioner's Office website, <https://ico.org.uk/your-data-matters/>.

If you wish to exercise any of these rights, please email [privacy@AdEPT.co.uk](mailto:privacy@AdEPT.co.uk), or use the information supplied in the Contact us section below. In order to process your request, we will ask you to provide two valid forms of identification for verification purposes.

## Terms and Conditions

If you choose to visit our AdEPT Websites, your visit and any dispute over privacy is subject to this Privacy Policy and our [Terms and Conditions](#), including, but not limited to, disclaimers of warranty, limitations of liability, and arbitration of disputes.

## Contact Us

Any comments, questions or suggestions about this Privacy Policy or our handling of your personal data should be emailed to [privacy@AdEPT.co.uk](mailto:privacy@AdEPT.co.uk). Please include "Privacy" in the email subject. Alternatively, you can contact us using the following postal address or telephone number:

**Postal Address:**

GDRP Compliance  
AdEPT Technology Group plc  
One Fleet Place  
London EC4M 7WS

**Telephone:**

+44 (0)2081 312471

Our telephone switchboard is open 9:00 am – 5:30 pm GMT, Monday to Friday.

**eMail:**

[enquiries@adept.co.uk](mailto:enquiries@adept.co.uk)