

This privacy policy describes how we, the data controller COUNTECT operating www.countect.co.uk, (hereinafter "COUNTECT" or "we") collect, store and process information about individual visitors to our website.

This privacy policy only applies to website of COUNTECT on which this privacy policy is stored or from which reference is made to this privacy policy by means of a link (hereinafter: "website"). This privacy policy does not apply to linked website that are not owned and controlled by COUNTECT.

## Commitment to data protection

Personal data is any information relating to personal or material circumstances that relates to an identified or identifiable individual. This includes, for example, your name, date of birth, e-mail address, postal address or telephone number as well as online identifiers such as your IP address. In contrast, information of a general nature that cannot be used to determine your identity is not personal data. This includes, for example, the number of users of a website.

In principle, we will only use your personal data in accordance with the applicable data protection laws, in particular the UK's Data Protection Act 2018 (DPA), the General Data Protection Regulation ("GDPR"), and only as described in this privacy policy.

However, we reserve the right to put this data to additional uses to the extent permitted or required by law or necessary to support legal or criminal investigations. In this case, we will inform you again about this further data processing to the extent required by law and obtain your consent.

In the next sections we explain when and how we process personal data about you when you visit our website.

## Purposes of use of personal data and legal basis

## a) Log Files

We only collect and process access data that your internet browser automatically transmits to us for technical reasons in order to provide the website. Depending on the access protocol used, the protocol data record contains general information with the following contents: Your session data (usage behaviour, length of stay, which links were clicked on, etc.), your abbreviated and unabbreviated IP address, your browser version, your operating system, your website-specific settings, your cookie IDs, your pixel IDs. This data does not allow any direct inference to your person and is processed to improve our website offer and to defend against attempted attacks on our web server. The legal basis for the processing of your personal data is Art. 6 para. 1 lit. f) GDPR. We have a legitimate interest in presenting you with a website optimised for your browser and in enabling communication between our server and your device.

## b) Hosting

To provide our website, we use the services of <u>Hostinger</u> who process the above-mentioned data and all data to be processed in connection with the operation of this website on our behalf. The legal basis for the data processing is our legitimate interest in providing our website in accordance with Art. 6 para. 1 f) GDPR.

#### b) Contact requests

If you contact us, we process the following data from you for the purpose of processing and handling your enquiry: Name, contact details -if provided by you- and your message.

The legal basis of the data processing is our obligation to fulfil the contract and/or to fulfil our precontractual obligations in accordance with Art. 6 (1) b) GDPR and/or our legitimate interest in processing your enquiry in accordance with Art. 6 (1) f) GDPR.

## c) Registration



If you register on our website, we will request personal and, where applicable, non-personal data in accordance with our registration form this may include your username, email address and password. The entry of your data is encrypted so that third parties cannot read your data when it is entered.

The basis for this storage is our legitimate interest in communicating with interested users according to Art. 6 para. 1 lit. f GDPR and, in the case of contracts, also the storage of contract data according to Art. 6 para. 1 lit. b GDPR.

Your data will remain stored for as long as the registration lasts, in particular the storage is still necessary for the fulfilment/execution of the contract, for legal prosecution by us or for our other legitimate interests or we are required by law to retain your data (e.g., within the framework of tax retention periods).

## d) Cookies and similar technologies

For the processing of personal data using cookies and similar technologies on our website, please refer to our Cookie Policy, which is part of this privacy policy.

## **Analysis / Marketing**

## a) Google Analytics

We use Google Analytics, a service provided by <u>Google</u> Inc. This means that the data collected can in principle be transmitted to a Google server in the USA, whereby the IP addresses are anonymised by means of IP anonymisation so that an allocation is not possible. The IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data. You can object to the collection and processing of this data by Google Analytics by setting an opt-out cookie that prevents the future collection of your data when you visit this website: <a href="http://tools.google.com/dlpage/gaoptout?hl=en">http://tools.google.com/dlpage/gaoptout?hl=en</a>. The legal basis for this processing is Art. 6 para. 1 lit. f) GDPR, our legitimate interest.

### b) Google AdSense

We use Google AdSense, a web advertising service provided by Google, Inc. Google AdSense uses so-called "DoubleClick DART Cookies" ("Cookies"). In addition, Google AdSense also uses so-called "web beacons" (small invisible graphics) to collect information, through the use of which simple actions such as user traffic on our online offer can be recorded, collected and evaluated. The information generated by the cookie and/or web beacon (including your IP address) about your visit to this website will be transmitted to and stored by Google on servers in the United States.

Google uses the information thus obtained to carry out an evaluation of user behaviour with regard to the AdSense ads. The IP address transmitted by your browser as part of Google AdSense will not be merged with other Google data. The information collected by Google may be transferred to third parties where required to do so by law, and/or where such third parties process the information on Google's behalf. The legal basis for this processing is Art. 6 para. 1 lit. f) GDPR, our legitimate interest.

#### Transfer of personal data

COUNTECT will not disclose or otherwise distribute your personal data to third parties unless this is necessary for the performance of our services (legal basis for processing: Art. 6 para. 1 lit. b) GDPR), you have consented to the disclosure (legal basis for processing: Art. 6 para. 1 lit. a) GDPR) or the disclosure of data is permitted by relevant legal provisions.

Personal data may also be disclosed to third parties if we are legally obliged to do so e.g., by court order (legal basis for processing: Art. 6 (1) (c) GDPR) or if this is necessary to support criminal or legal investigations or other legal investigations or proceedings at home or abroad or to fulfil COUNTECT's legitimate interests (legal basis for processing: Art. 6 (1) (f) GDPR).

## Storage and retention

Your personal data will be stored by us only for as long as is necessary to achieve the purposes for which the data was collected or - if statutory retention periods exist that go beyond this point and for



the duration of the legally prescribed retention period (typically 6 years). We then delete your personal data. Only in a few exceptional cases is your data be stored beyond this period, e.g. if storage is necessary in connection with the enforcement of and defence against legal claims against us.

#### **International transfers**

Our main operations are based in the UK and your personal information is generally processed, stored and used within in the UK and other countries in the European Economic Area (EEA). In some instances, your personal information may be processed outside the European Economic Area. If and when this is the case, we take steps to ensure there is an appropriate level of security, so your personal information is protected in the same way as if it was being used within the UK and the EEA.

Where we need to transfer your data outside the UK or the EEA, we will use one of the following safeguards:

- The use of approved standard contractual clauses in contracts for the transfer of personal data to third countries.
- Transfers to a non-EEA country with privacy laws that give the same protection as the UK and the EEA.

## **Your Rights**

You have a number of 'Data Subject Rights' below is some information on what they are and how you can exercise them. There is more information on the Information Commissioners website (www.ico.org.uk).

- information about the processing of your personal data.
- obtain access to the personal data held about you.
- ask for incorrect, inaccurate or incomplete personal data to be corrected.
- request that personal data be erased when it's no longer needed or if processing it is unlawful.
- object to the processing of your personal data for marketing purposes or on grounds relating to your particular situation.
- request the restriction of the processing of your personal data in specific cases.
- receive your personal data in a machine-readable format and send it to another controller ('data portability').
- request that decisions based on automated processing concerning you or significantly affecting you and based on your personal data are made by natural persons, not only by computers.
- You also have the right in this case to express your point of view and to contest the decision
- Where the processing of your personal information is based on consent, you have the right to withdraw that consent without detriment at any time through our contact form.

The above rights may be limited in some circumstances, for example, if fulfilling your request would reveal personal information about another person, if you ask us to delete information which we are required to have by law, or if we have compelling legitimate interests to keep it.

We will let you know if that is the case and will then only use your information for these purposes. You may also be unable to continue using our services if you want us to stop processing your personal data

We encourage you to get in touch if you have any concerns with how we collect or use your personal data You do however also have the right to lodge a complaint directly with the ICO, their contact details can be found on their website (www.ico.org.uk).

# Security and confidentiality

To ensure the security and confidentiality of the personal data we collect on the website, we use data networks that are protected by, among other things, industry-standard firewalls and password systems.



When handling your personal information, we take appropriate technical and organisational measures to protect your information from loss, misuse, unauthorised access, disclosure, alteration or destruction and to ensure its availability.

## Links to other website

The website may contain links to another website. We have no control over the privacy practices or the content of those other website. Therefore, we recommend that you carefully read the respective privacy policies of these other website that you visit.

### Changes

This Policy and our commitment to protecting the privacy of your personal data can result in changes to this Policy. Please regularly review this Policy to keep up to date with any changes.

## **Queries and Complaints**

If you have any concerns about a possible compromise of your privacy or misuse of your personal information on our part, or any other questions or comments, you can contact us.