

Opentree Limited

Privacy Policy

Introduction

Opentree Limited (**we**) are committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data that we collect from you, or that you provide to us, will be processed by us. Please read this policy carefully to understand our views and practices regarding your personal data and how we will treat it. By accessing our services through www.opentree.co.uk (**our website**), you are accepting and consenting to the practices described in this policy.

Our approach to information security is constantly evolving and will be continually reviewed. Please check this policy from time to time and before you submit any personal data to us.

We seek to abide by the terms of the Data Protection Act 1998 (**DPA**) and as of 25 May 2018 the General Data Protection Regulation (GDPR) and adopt industry best practices regarding privacy, including the guidelines issued from time to time by the UK Information Commissioner's Office entitled 'Privacy Notes - Code of Practice'. We are a "data controller" where we control the purposes for which we process your personal information and otherwise we act as a "data processor".

You may also obtain further information and assistance by contacting the UK Information Commissioner's Office through the following link - <https://ico.org.uk/for-the-public/raising-concerns/>.

Information that we may collect from you

We may collect and process the following data about you:

- **Information that you provide to us about yourself.** You may provide us with information when you correspond with us (whether by telephone, email via our website or otherwise), when you access our services and if you report a problem with our website or our services. The information that you provide to us may include your forename and surname (if an individual) a contact email address and/or telephone number. You may change these details, or add additional details, at any time by contacting us at info@opentree.co.uk.
- **Information that we collect about you.** We may automatically collect technical information when you access our website including the internet protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time), page response times, download errors and length of visits to certain pages.
- **Information that we may receive from other sources.** We may receive information about you should we work with a third parties, for example sub-contractors in technical and payment services or analytics providers.
- **Personal information about other individuals.** If you give us information on behalf of someone else, you confirm that either;
(1) the other person has a contractual relationship with you and knows that you will be transferring their personal data to us for specific purposes; and/or

- (2) s/he has appointed you to act on his/her behalf and has agreed that you can:
- (a) give consent on his/her behalf to the processing of his/her personal data
 - (b) receive on his/her behalf any data protection notices

Uses made of the information

We only use your personal data in accordance with one of the lawful bases permitted under the GDPR. In particular we may use the information held about you in the following ways:

- To undertake our obligations arising from any contracts that we enter into with you and to provide you with information and services that you may request from us.
- To notify you about any changes and updates to our services.
- To ensure that content from our website is presented in the most effective manner for you and your computer.
- To populate features of our services.
- To administer our website for internal operations including troubleshooting, data analysis, testing, research and complying statistics regarding user trends on our website.
- As part of our efforts to keep our website safe and secure and to continually improve our services and user experience.
- We may contact you with updates regarding your activity on our website, your access to our services and how we are evolving to deliver greater benefits to you. You can opt out of these updates at any time by clicking on the 'unsubscribe' link in our emails or by contacting us by email at info@opentree.co.uk.

We will not share your user information with third parties for promotional purposes but, in accessing our services, you acknowledge that any content that you post publicly will be visible to others.

We may instruct third party organisations to analyse our statistics. We will ensure that these statistics do not contain any information by which you can be identified.

Marketing

We use your personal data to provide you with further information about the products and services we offer which may be of interest to you. You can choose to unsubscribe at any point by clicking on the link at the bottom of the email or by contacting us (as set out below). (The lawful basis on which we do this is in accordance with our legitimate business interests).

Email marketing campaigns published by us may contain tracking facilities within the actual email. Subscribed activity is tracked and stored in a database for future analysis and evaluation. Such tracked activity may include: the opening of emails, forwarding of emails, the clicking of links within the email consent, times, dates and frequency of activity (this is by no means a comprehensive list).

How long we intend to keep your information

Your personal data will be stored for as long as you are accessing our services. Thereafter any hard copies of personal data are destroyed after 6 years and customer contact details are kept for 6 years after ceasing to be a customer or until you ask us to destroy or return them unless we are legally obliged to keep such information for longer.

Should you wish to remove your personal data from our service, please contact us in writing by email to info@opentree.co.uk. There will be a period during which your data will be held on our back-up systems. After this, all content that you created on our website will be deleted permanently.



Where we hold your information

All information that you provide to us is stored on our secure servers. We may at any time transfer and store this information to another destination, including a destination outside of the European Economic Area (**EEA**). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the processing of your payment details and the provision of our services (including any technical and support services). However we will only allow your personal data to be transferred outside the EEA where we have put appropriate legal safeguards in place.

By submitting your personal data, you agree to this transfer, storing and processing. We will ensure that your personal data is treated securely and in accordance with this policy and the GDPR.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. Aside from any operators that you authorise to access our services on your behalf, we ask you not to share this password with anyone. We will keep your password confidential and only use it for the purpose which we are authorised to do so.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site via email; any such transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Your rights regarding your personal information

The GDPR provides the following rights for individuals whose personal data is processed:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object to processing
8. Rights in relation to automated decision making and profiling (We do not carry out automated decision making and profiling)

To request compliance with one of the rights listed above

You can access all of the information that we hold about you, or ask us to correct any mistakes, or have your personal data erased (unless we have to keep it for legal reasons); or ask us to restrict how we process your personal data etc by contacting us in writing by email at info@opentree.co.uk and providing us with:

- (1) proof of your identity (a copy of your driving licence or passport); and
- (2) details of the information you want or the action you want us to implement.

Concerns/complaints

If you have any concerns or complaints about how we use your personal data we hope you will alert us to these directly (see the Contact information below). You are entitled to complain to the Information Commissioners Office (ICO) and their contact details and the procedure can be found at www.ico.gov.uk.



Our Cookie Policy

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies also contain information that is transferred to your computer's hard drive.

Cookies are an essential part of how our website operates and are used to distinguish you from our other users. They help us to record when you have logged into our service, so that you do not have to re-insert your login details on each new page, and to recognise you when you return to our website in a new visit. We use cookies in this way to improve your user experience and to enable us to improve various features on our website.

We will not disclose the information that our cookies contain to any third party.

Third party cookies

We use the following third party service from time to time which uses its own cookies:

- Google Analytics - we use Google Analytics to understand general trends about our content and traffic sources. For example, where users access our website from, which pages of our website are most popular and which provide the most traffic and how our marketing efforts impact the amount of visits we receive. You can read Google's statement about privacy through <http://www.google.co.uk/intl/en/analytics/privacyoverview.html>

Consent to receive cookies

By continuing to browse our website, you are agreeing to our use of cookies as detailed in this policy.

You may block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

If you want to understand more about what cookies are, you can access further information through <http://www.allaboutcookies.org/> and, in relation to licences, through <http://creativecommons.org/licenses/by-sa/3.0/>

How to contact us

If after reading this policy you have any concerns or queries about the way we collect or use personal data, please contact us in writing to our registered address at Cabinet House, 7 Ellerbeck Court, Stokesley Business Park, Stokesley, North Yorkshire, TS9 5PT or by email to info@opentree.co.uk.

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