

Privacy Statement - Website

CXC Global respects your privacy and we are committed to protecting your right to privacy.

This statement sets out how we collect, use, process and disclose personal data that we collect from you, or that you provide to us on our website and mobile website, [www.CXC Global.com](http://www.CXCGlobal.com) (Website). This statement includes the relevant requirement of the General Data Protection Regulation. It applies to both your visit to our website (regardless of where you visit it from) and when you use our services. This statement should be read in conjunction with our [cookie policy](#).

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

CONTROLLER

CXC Global is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy notice). When we refer to CXC Global we mean:

CXC Global EMEA UK Limited

Company Number: 10401238

Registered address: Bradleys, 81A Bellegrove Road, Welling, Kent, England, DA16 3PG

CXC GLOBAL

This privacy statement is in respect of personal data collected by CXC Global.

COLLECTION OF PERSONAL DATA

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

As part of our services, we may need to collect use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments from you.
- **Technical Data** includes for example internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, the URL linking you to our website and other technology on the devices you use to access our website.
- **Communications Data** includes your preferences in receiving communications from us.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We may collect data that falls into Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) but will not do this without a legitimate condition for processing.

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms, signing up to our newsletter or by corresponding with us by post, phone, email or otherwise.

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your browsing actions. We collect this personal data by using cookies. We also collect personal data automatically when you use our Website, as explained in our [cookie policy](#).

If you fail to provide personal data we may not be able to perform services we offer to you.

USES MADE OF YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

1. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. For example to provide you with information about services you have requested;
2. Where we need to comply with a legal or regulatory obligation;
3. Where processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent; and/or
4. Where processing is carried out in the course of our legitimate activities with appropriate safeguards by us and only when that processing relates solely to our users or to former users or to persons who have regular contact with us in connection with our purposes and that the personal data is not disclosed outside CXC Global without the consent of the data subjects.

Generally we do not rely on consent as a legal basis for processing your personal data.

For the purpose of our providing services to you, we shall use personal data and may share it with CXC Global staff. The legal basis for the processing of such data is for the performance of a contract with you or to comply with a legal obligation or where it is necessary for our legitimate interest in providing legal services to you. We may disclose

personal data to our services company or holding company and to third party service providers (such as our partners, agents, credit card providers, Banks, IT service providers) as well as with third parties (such as third party experts and regulators) where required by law, where necessary to administer our working relationship with you or where we have a legitimate interest in doing so. We may also use personal information where it is needed in the public interest or for official purposes.

We have set out below, in a table format, a description of some of the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below. (Please see 'Contact Us' below)

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a service user	(a) Identity (b) Contact	Necessary for our legitimate interests
To process payments: (a) Manage payments, fees and charges (b) Collect and recover money owed to us.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	Necessary for our legitimate interests
To manage our relationship with you which will include: (a) Notify you about information relevant to	(a) Identity (b) Contact (c) Profile (d) Marketing and	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to keep our records updated and to study how customers

your purchase with us; (b) Notifying you about changes to our terms or privacy policy	Communications	use our products/services)
To administer and protect our organisation and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our services and grow our business)

We may use personal data to send you ezines, newsletters, invitations to seminars and similar marketing but we shall seek your consent to receiving such marketing materials from us. If at any time you decide that you do not wish to receive marketing emails from us, you can opt out by emailing marketing@cxglobal.com.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [cookie policy](#).

DISCLOSURE OF YOUR PERSONAL DATA

We may disclose your personal data to third parties who provide a service to us (eg our internet service provider) and are bound by confidentiality provisions or in the event that we sell or buy any business or assets, in which case we may disclose your personal data to

the prospective seller or buyer of such business or assets or if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or where necessary for our legitimate business interests to protect the rights, property, or safety of CXC Global, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Communication of information via the Internet and by email is not completely secure and involves the information passing through third parties. In addition, communication of information via the Internet and by email may involve the transfer of personal data to third parties outside of the European Economic Area (EEA). To the limited extent that it is necessary to transfer your personal data outside of the EEA, we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. Please contact us if you wish to obtain information concerning such safeguards (see 'Contact Us' below).

DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our data retention policy which you can request from us by contacting us. (See 'Contact Us' below).

In some circumstances you can ask us to delete your data: see request erasure below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

YOUR RIGHTS

In certain circumstances, by law you have the right to:

- Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal data - provided that we are not required to retain the data for the performance of your employment contract or to comply with our legal obligations. Any deletion of personal data may impact on our ability to provide a reference for you.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and you want to object to processing on this ground.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal data to another party.

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact our Data Protection Officer ("DPO") (TBD). All requests should be sent to our DPO in writing by email or post (please see 'Contact Us' below). We will respond to your request as soon as possible and in any event within one month of receipt. We may request additional information from you to verify your identity and to enable us to respond to your request. You will not have to pay a fee to access your personal

data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

In circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please email dataprivacy@cxglobal.com.

Once we have received notification that you have withdrawn your consent, we will no longer process your data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

However, no data transmission over the internet can be 100% secure, and so we cannot guarantee the security of any information you send to us over the internet. Any transmission of such information is at your own risk.

THIRD PARTY PROCESSORS

Our information technology systems are operated by CXC Global but some data processing is carried out on our behalf by a third party. Where processing of personal data is carried out by a third party data processor on our behalf we endeavour to ensure that appropriate security measures are in place to prevent unauthorised disclosure of personal data. Our

data processor is BS 10012:2017 certified as the best practice framework when collecting, storing, processing, retaining or disposing of personal records associated with individuals.

LINKS TO THIRD PARTY WEBSITES

Our Website may contain links to and from other websites, plug-ins and/or applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit. Please note that we do not accept any responsibility or liability if you follow a link to any of those websites.

OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by following the opt out links in any marketing message sent to you or by emailing marketing@cxcglobal.com. (For more information please see 'Contact Us' below). Where you opt out of receiving these messages, this will not apply to personal data provided to us as a result of a service we have provided.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

AMENDMENTS TO THIS STATEMENT

We reserve the right to change this privacy statement at any time. Any changes will be posted here and we will update the "Last Updated" date at the bottom of this statement. When you use our Website after any such change, you will be deemed to have appraised to the current version of the privacy statement and accordingly you should check the privacy statement from time to time.

Last updated: May 2018

It is important that all personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

CONTACT US

If you have any requests to exercise your legal rights or questions or concerns which specifically relate to how your personal data is processed by us via our Website please contact us using the details set out below.

Name of DPO: [Eamonn Wren]

Email address: dataprivacy@CXCGlobal.com

Postal address: CXC Global EMEA UK, Bradleys, 81A Bellegrove Road, Welling, Kent, England, DA16 3PG

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK Supervisory authority for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.