
SUPERCEDE TECHNOLOGY LTD PRIVACY POLICY

BACKGROUND:

Supercede Technology Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, www.supercede.com (our "Site") and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is requested in order to continue using our site.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

"Account"	means an account required to access and/or use certain areas and features of our Site;
"Cookie"	means a small text file placed on your computer or device by our Site when you visit certain parts of our Site and/or when you use certain features of our Site. Details of the Cookies used by our Site are set out in our Cookies Policy ;
"Cookie Law"	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;

2. Information About us

our Site is owned by Supercede Technology Ltd, a limited company registered in England under company number 10475714, whose registered address is 1 Adamson Drive, Telford, TF4 3UJ, United Kingdom.

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of our Site. Our Site may contain links to other third party websites. Please note that We have no control over how your data is collected, stored, or used by other third party websites and we do not accept any responsibility or liability for their policies or processing of your personal data. We advise you to check the privacy policies of any such websites before providing any data to them.

4. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers,

electronic location data, and other online identifiers.

5. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which **We** will always work to uphold:

- a) The right to be informed about **our** collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact **us** to find out more or to ask any questions using the details in the *“How Do I Contact You?”* section below.
- b) The right to access the personal data **We** hold about you. The *“How Can I Access My Personal Data?”* section below will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by **us** is inaccurate or incomplete. Please contact **us** using the details in the *“How Do I Contact You?”* section below to find out more.
- d) The right to be forgotten, i.e. the right to ask **us** to delete or otherwise dispose of any of your personal data that **We** hold. Please contact **us** using the details in the *“How Do I Contact You?”* section below to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to **us** using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if **we are** relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to **us** directly, **we are** using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask **us** for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling.

Your exercise of these rights is subject to certain exemptions to safeguard the public interest (e.g. the prevention or detection of crime) and **our** interests (e.g. the maintenance of legal privilege). If you exercise any of these rights we will check your entitlement and respond in most cases within a month.

For more information about **our** use of your personal data or exercising your rights as outlined above, please contact **us** using the details provided in the *“How Do I Contact You?”* section below.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data **We** hold about you changes, please keep **us** informed as long as **We** have that data.

Further information about your rights can also be obtained from the Information Commissioner’s Office at: <https://ico.org.uk/concerns/> or your local Citizens Advice Bureau.

If you have any cause for complaint about **our** use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office. **We** would welcome the opportunity to resolve your concerns ourselves, however, so please contact **us** first, using the details in the *“How Do I Contact You?”* section below.

6. What Data Do You Collect and How?

Depending upon your use of **our** Site, **We** may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. Please also see **our** [Cookies Policy](#) for more information about **our** use of Cookies and similar technologies. **We** do not collect any ‘special category’ or ‘sensitive’ personal data, personal data relating to children **or** data relating to criminal convictions and/or offences.

Data Collected	How We Collect the Data
Name	User provides on registration
Email address	User provides on registration
Password	User provides as authentication
Company information	Used to manage your Site permissions
Job title	User provides information to indicate role to other users
Location	User provides information to indicate location to other users
Bio	User can provide more information about their commercial experience and interests to other users
Risk appetite	User can provide risk appetite information by product and geography to other users
Technical information including IP address, domain name, browser type and version, operating system, traffic data, location data, web logs, other communication data and information collected through cookies and other tracking technologies	Automatically collected by our Site to optimise user experience
Usage information including risks created and interacted with, messages shared, and other workflow logs	Automatically collected by our Site to optimise user experience
Credit and anti-fraud information	User provides information relating to their financial situation, creditworthiness or any criminal or fraudulent activities including information which establishes the users identity, such as driving licences, passports and utility bills; information about transactions, credit ratings from credit reference agencies; fraud, offences, suspicious transactions, politically exposed persons and sanctions lists
Details of transactions	Automatically collected by our Site to record details of transactions carried out through our Site or through other channels

Correspondence	Collected by us when you contact us in order to keep a record of the correspondence which may include telephone calls, which we record to assist us in training our staff and undertaking quality checks
Data from third parties	Collected via third parties including our partner organisations

7. How Do You Use My Personal Data?

Under the Data Protection Legislation, **We** must always have a lawful basis for using personal data. The following table describes how **We** may use your personal data, and **our** lawful bases for doing so (a full description of each of these bases can be found in Annex 1):

What We Do	What Data We Use	our Lawful Basis
Registering you on our Site.	Name, Email address	Consent and legitimate interest to uniquely identify the user
Providing and managing your Account.	Company information	Consent and legitimate interest to provide the correct services to the user based on their authorisation rights
Providing and managing your access to our Site.	Email address, password	Consent and legitimate interest to authenticate the user
Personalising and tailoring your experience on our Site.	Company information, Job title, Location, Risk appetite, Bio	Consent and legitimate interest to provide the user with relevant information and match them effectively with other users and content
Administering our Site.	Technical and usage information	Consent and legitimate interest to maintain and monitor the proper functioning of the Site for the user
Communicating with you	Name, email address, contact information	Contract performance, legitimate interests (to enable us to perform our obligations, provide our services to you and keep you informed)

To verify your identity in relation to fraud/crime prevention	Personal data we have collected from you which will be shared with fraud prevention agencies that will use it to prevent fraud and money-laundering and to verify your identity	Legitimate interests (to allow us to improve our services). Where personal data relating to criminal convictions or offences is processed, we will rely on substantial public interest (fraud prevention) or legal claims, as applicable.
Providing you with marketing materials where you have chosen to receive them	Your contact details including address, email, phone number	Consent, legitimate interests (to offer you products and services that may be of interest to you)
Analysing your personal data in order to better understand your requirements for research and development purposes	Any personal data you provide when registering on our Site or when using our services	Legitimate interests (to enable us to improve our services)
Informing you of changes to our services and products	Your contact details including address, email, phone number	Legitimate interests (to notify you about changes to our services)
Ensuring the content on our Site is relevant	Any personal data you provide when registering on our Site	Legitimate interests (to allows us to provide you with the content and services on our Site)
Reorganising or making changes to our business	Any personal data you provide when registering on our Site or when using our services	Legitimate interests (in order to allow us to change our business); contract performance (in relation to assignment)
To comply with our legal or regulatory obligations we may disclose your personal data to third parties, the court service and/or regulators or law enforcement agencies in connection with enquiries, proceedings or investigations by such parties anywhere in the world or where compelled to do so. Where permitted, we will direct any such request to you before responding unless to do so would prejudice the prevention or detection of a crime	Any personal data you provide when registering on our Site or when using our services	Legal obligations, legal claims, legitimate interests (to cooperate with law enforcement and regulatory authorities)

With your permission and/or where permitted by law, **We** may also use your personal data for marketing purposes, which may include contacting you by email, telephone, text message and post with information, news, and offers on **our services**. You will not be sent any unlawful marketing or spam. **We** will always work to fully protect your rights and comply with **our** obligations under the Data Protection Legislation and the

Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. **We** will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

Third Parties whose content appears on **our** Site may use third-party Cookies, as detailed below in **our** [Cookies Policy](#). Please refer to **our** [Cookies Policy](#) for more information on controlling cookies. Please note that **We** do not control the activities of such third parties, nor the data that they collect and use themselves, and **We** advise you to check the privacy policies of any such third parties.

We use the following automated system for carrying out certain kinds of decision-making **and** profiling. If at any point you wish to query any action that **We** take on the basis of this or wish to request 'human intervention' (i.e. have someone review the action themselves, rather than relying only on the automated method), the Data Protection Legislation gives you the right to do so. Please contact **us** to find out more using the details in the "*How Do I Contact You?*" section below.

- The following automated decision-making method(s) may be used:
 - based on your work email address, identifying which company you work for and whether this is a broking or underwriting firm.
- The following automated profiling may take place:
 - based on the types of risks you create or have shared with you, estimating your risk appetite.

We will only use your personal data for the purpose(s) for which it was originally collected unless **We** reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If **We** do use your personal data in this way and you wish **us** to explain how the new purpose is compatible with the original, please contact **us** using the details in the "*How Do I Contact You?*" section below.

If **We** need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, **We** will inform you and explain the legal basis which allows **us** to do so.

In some circumstances, where permitted or required by law, **We** may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

8. **How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. To ensure auditability for legal and regulatory purposes, all data will be retained for 7 years after a user account is closed

9. **How and Where Do You Store or Transfer My Personal Data?**

We will store or transfer some of your personal data within the UK. This means that it will be fully protected under the Data Protection Legislation.

We will store or transfer some of your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the Data Protection Legislation, GDPR, and/or to equivalent standards by law.

We will store or transfer some or all of your personal data in countries that are not part of the EEA. These are known as "third countries" and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that

We will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

We transfer your personal data to third countries whose levels of data protection are deemed 'adequate' by the European Commission. More information is available from the [European Commission](#).

Where **We** transfer your data to a third party based outside of the EEA, they may be in countries, such as the USA, which have not yet been determined by the European Commission or other European supervisory authority to have an adequate level of data protection. For example, their laws may not guarantee you the same rights, or there may not be a privacy supervisory authority there that is capable of addressing your complaints. When we make such transfers we ensure that appropriate protections are in place under European data protection legislation (which includes Model Clauses) to ensure equivalent rights and protections travel with the personal data.

Please contact **us** using the details in the "*How Do I Contact You?*" section below for further information about the particular data protection mechanisms used by **us** when transferring your personal data to a third country.

The security of your personal data is essential to **us**, and to protect your data, **We** take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where **we are** legally required to do so

No data transmission over the Internet or website can be guaranteed to be secure from intrusion. However, we maintain commercially reasonable physical, electronic and procedural safeguards to protect your personal data in accordance with Data Protection Legislation.

10. **Do You Share My Personal Data?**

We will not share any of your personal data with any third parties, except where you have made it visible to other parties through your profile, to enable improvements to the functioning of **our** site (e.g. bug tracking) or for the purposes of delivering **our** services to you, when **we** have a legitimate legal basis for sharing your data with a third party.

We use certain cloud software products that are helping us deliver **our** service. Before onboarding such a provider **we** conduct due diligence and **we** have strict contractual obligations in place with them in order to ensure that your data will be kept secure and in order to monitor their internal practices. If you would like to have a list of the current providers that your data is being shared with, please contact us using the details in the "*How Do I Contact You?*" section below.

If **We** sell, transfer, or merge parts of **our** business or assets, your personal data may be transferred to a third party. Any new owner of **our** business may continue to use your personal data in the same way(s) that **We** have used it, as specified in this Privacy Policy.

In some limited circumstances, **We** may be legally required to share certain personal data, which might include yours, if **we** are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, **our** obligations, and the third party's obligations under the law, as described above in the section "*How and Where Do You Store or Transfer My Personal Data?*".

If any personal data is transferred outside of the EEA, **We** will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in the section "*How and Where Do You Store or Transfer My Personal Data?*".

11. **How Can I Control My Personal Data?**

1. In addition to your rights under the Data Protection Legislation, set out above in the section "*What Are My Rights?*", when you submit personal data via **our** Site, you may be given options to restrict **our** use of your personal data. In particular, **We** aim to give you strong controls on **our** use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from **us** which you may do by unsubscribing by email to support@supercede.com).
2. You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

12. **Can I Withhold Information?**

You may access certain areas of **our** Site without providing any personal data at all. However, to use all features and functions available on **our** Site you may be required to submit or allow for the collection of certain data.

You may restrict **our** use of Cookies. For more information, see **our** [Cookies Policy](#).

13. **How Can I Access My Personal Data?**

If you want to know what personal data **We** have about you, you can ask **us** for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in the "*How Do I Contact You?*" section below.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover **our** administrative costs in responding.

We will respond to your subject access request within one month. Normally, **We** aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time

may be required up to a maximum of three months from the date **We** receive your request. You will be kept fully informed of **our** progress.

14. **How Do You Use Cookies?**

You can read our full cookies policy here: [Cookies Policy](#)

15. **How Do I Contact You?**

To contact **us** about anything to do with your personal data and data protection, including to make a subject access request, please use the following email address: support@supercede.com

16. **Changes to this Privacy Policy**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if **We** change **our** business in a way that affects personal data protection.

Any changes will be immediately posted on **our** Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of **our** Site following the alterations. **We** recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on 10/11/2022.

Annex 1: Lawful bases

Use of personal data under EU data protection laws must be justified under one of a number of legal “grounds” and we are required to set out the grounds in respect of each use in this policy. We note the grounds we use to justify each use of your information next to the use in the “**How do you use my personal data?**” section of this policy.

These are the principal legal grounds that justify our use of your personal data:

<p>Consent: where you have consented to our use of your information (you will have been presented with a consent form in relation to any such use as part of our Terms and Conditions and may withdraw your consent by contacting us using the details set out in the “How Do I Contact You?” section).</p>
<p>Contract performance: where your information is necessary to enter into or perform our contract with you.</p>
<p>Legal obligation: where we need to use your information to comply with our legal obligations.</p>
<p>Legitimate interests: where we use your information to achieve a legitimate interest and our reasons for using it outweigh any prejudice to your data protection rights.</p> <p><i>In determining that the use of your information is necessary to achieve a legitimate interest of ours, we have taken into account your data protection rights. If you have any questions about the assessment we have made in order to rely on this legal basis, please contact us using the details set out in the “How Do I Contact You?” section.</i></p>

These are the principal Lawful Bases that justify our potential processing of personal data relating to criminal offences and convictions:

<p>Substantial Public Interest: to prevent fraud</p>
<p>Legal claims: where your information is necessary for us to defend, prosecute or make a claim against you, or a third party.</p>