



PRIVACY POLICY

Introduction

Style Analytics Limited respects your privacy and is committed to protecting your personal data. We ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

1. Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how Style Analytics Limited collects and processes your personal data.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy 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 policy supplements other notices and privacy policies and is not intended to override them.

Our website <https://www.styleanalytics.com> is not intended for children and we do not knowingly collect data relating to children.

Controller

Style Analytics Limited is the controller and responsible for your personal data (collectively referred to as "Style Analytics", "we", "us" or "our" in this privacy policy). When we refer to our "Group" in this policy, we are referring to Style Analytics and its group companies, including its Canadian and US subsidiary companies.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Name of data privacy manager: Lee Colliss – CFO

Email address: infosec@styleanalytics.com

Postal address: Style Analytics, Melbourne House, 46 Aldwych, London, England, WC2B 4LL

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 (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes



We keep our privacy policy under regular review. This version was last updated on 21 December 2018.

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

Third-party links

This website may include links to third-party websites, plug-ins and 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 policy of every website you visit.

2. The data we collect about you

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).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as 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 postal address, email address and telephone numbers.
- **Technical Data** includes 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, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us or any other company within our Group and your communication preferences.

We may from time to time also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **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 policy.

We do not collect any **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). Nor do we collect any information about criminal convictions and offences.

3. How is your personal data collected?

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

- **Direct interactions.** You may give us your Identity and Contact by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us.
- **Our corporate customer.** To provide our customer's users with access to our services, we will collect certain personal information about you such as your Identity and Contact in order to set up a user account for you.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy for further details: <https://www.styleanalytics.com/terms-conditions-cookie-policy>.
- **Other third parties or publicly available sources.** We may receive or collect personal data about you from various third parties (including other companies within our Group) and public sources.

4. How we use 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:

- Where we need to perform the contract we are about to enter into or have entered into with our corporate customer.
- 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. Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- Where we need to comply with a legal obligation.



Generally, we do not rely on consent as a legal basis for processing your personal data although we will usually obtain your consent before sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will collect your personal data

We have set out below, in a table format, a description of the ways we use your personal data, and which of the legal bases we rely on to do so. Please contact us if you need details about the specific legal ground we are relying on to process your personal data.

Purpose/Activity	Examples of type of data	The lawful basis for processing which will be most likely relying on for that purpose/activity
To respond to your enquiry (including a request for a demo) which you have raised by filling in forms on our website or by contacting us by telephone or e-mail	(a) Identity (b) Contact	Responding to your query
To note you as a point of contact for a corporate customer	(a) Identity (b) Contact	Performance of a contract with the corporate customer
To process and deliver an order to the corporate customer of which you are a contact including: (a) manage payments, fees and charges (b) collect and recover money owed to us	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with the corporate customer (b) Necessary for our legitimate interests (to recover debts due to us)
To set up and administer your user account for you in accordance with our contract with the corporate customer and to allow you to access and use our services	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with the corporate customer (b) Necessary for our legitimate interests (e.g. to understand how you use our services and that such use in accordance with our terms and conditions)

To provide our corporate client with information about your use of our services	(a) Identity (b) Contact (c) Profile (d) Usage (e) Technical	(a) Performance of a contract with the corporate customer
To manage our relationship with the corporate customer (of which you are a point of contact) which will include: (a) notifying you about changes to our terms or privacy policy (b) asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with the corporate customer (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (e.g. to keep our records updated and to study how customers and users use our products/services)
To enable you to complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	(a) Performance of a contract with the corporate customer (b) Necessary for our legitimate interests (e.g. to study how customers and users use our products/services, to develop them and grow our business)
To administer and protect our business 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 (e.g. for running our business, enforcing our terms and conditions, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or	(a) Identity (b) Contact	Necessary for our legitimate interests (e.g. to study how customers use our

understand the effectiveness of the advertising we serve to you	(c) Profile (d) Usage (e) Marketing and Communications (f) Technical	products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (e.g. to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy, to personalise your experience when using our services)
To make suggestions and recommendations to you about goods or services that may be of interest to you, for example, to highlight new available product features to you when you use our services	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (e.g. to develop our products/services and grow our business)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us, or if you are a contact for our corporate client or have been in contact with us regarding the purchase of our services and you have not opted out of receiving that marketing.



Third-party marketing

Opting out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you.

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 <https://www.styleanalytics.com/terms-conditions-cookie-policy>.

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 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.

5. Third parties

Where necessary, we may share your personal data with the parties set out below for the purposes set out in the table above.

- Other companies within our Group.
- External third parties as set out below:
 - Service providers acting as processors who provide IT and system administration services.
 - Professional advisers including lawyers, bankers, auditors and insurers based in the United Kingdom, Canada and USA who provide consultancy, banking, legal, insurance and accounting services.
 - HM Revenue & Customs, regulators and other authorities based in the United Kingdom.
 - Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

Please note that we also use cloud hosting services such as Amazon Web Services to service our business needs and to provide highly secure and resilient hosting facilities for our products. Where this is the case, the hosting services provider acts as a mere processor on our behalf and will not process your personal data for any other purpose other than to provide the hosting services.



We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

Some of our hosting providers or external third parties may store or otherwise process your personal data on our behalf 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 your personal data and we will endeavour to put in adequate safeguards to ensure your personal data is safe, for example, we may adopt specific contractual clauses approved by the European Commission which give personal data the same protection it has in Europe or, in the case of US, we may rely on the Privacy Shield which requires US persons to provide similar protection to personal data shared between Europe and the US.

Please note that we will also share your personal data within our Group which involves transferring your data outside the European Economic Area (EEA).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. Data 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.

8. Data retention

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

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

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. In summary, those include the right to:

- request to access to your personal data (commonly known as a "data subject access request"), which enables you to receive a copy of the personal data we hold about you;



- request correction of your personal data that we hold about you, which enables you to have any incomplete or inaccurate data we hold about you corrected (though we may need to verify the accuracy of the new data you provide to us);
- request erasure of your personal data (commonly known as “the right to be forgotten”), which enables you to ask us to delete or remove personal data. Note that we may not always be able to comply with your request for specific legal reasons which will be notified to you at the time of your request.
- object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) where you feel it impacts on your fundamental rights and freedoms. In some cases, however, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms;
- request restriction of processing your personal data in certain circumstances;
- request transfer of your personal data to you or to a third party in a structured, commonly used, machine-readable format;
- right to withdraw consent at any time where we are relying on consent to process your personal data. Note that this will not affect the lawfulness of any processing carried out before you withdraw your consent. Further, if you withdraw your consent, we may not be able to provide certain products or services to you.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner’s Office (ICO) on individuals’ rights under the Data Legislation.

If you wish to exercise any of the rights set out above, please contact our data protection manager.

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 is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.