

# Lineup Ninja General Privacy and Cookies Policy

## 1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors and service users; in this policy we explain how we will handle your personal data.
- 1.2 By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

## 2. How we use your personal data

- 2.1 In this Section 2 we have set out:
  - (a) the general categories of personal data that we may process;
  - (b) [in the case of personal data that we did not obtain directly from you, the source and specific categories of that data];
  - (c) the purposes for which we may process personal data; and
  - (d) the legal bases of the processing.
- 2.2 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.
- 2.3 We may process your account data ("**account data**"). The account data may include your name, address, telephone number and email address. The source of the account data is you or your employer. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.
- 2.7 We may process information contained in any enquiry you submit to us regarding products and/or services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant products and/or services to you. The legal basis for this processing is consent.
- 2.9 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent.

- 2.10 We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.
- 2.11 We may process any of your personal data identified in the other provisions of this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 2.13 In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
- 2.14 Please do not supply any other person's personal data to us, unless we prompt you to do so.

#### **4. Providing your personal data to others**

- 4.2 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.
- 4.3 We may disclose **account data** to our suppliers or subcontractors insofar as reasonably necessary for our legitimate interests, namely our interest in the proper administration of our website and business.
- 4.6 In addition to the specific disclosures of personal data set out in this Section 4, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

#### **5. International transfers of your personal data**

- 5.1 In this Section 5, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).
- 5.3 The hosting facilities for our website are situated within the European Economic Area (EEA).
- 5.4 Analytics System providers are situated in the United States of America. Transfers to the Analytics System providers will be protected by appropriate safeguards, namely the EU-US Privacy Shield.

## **6. Retaining and deleting personal data**

- 6.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 6.3 We will retain and delete your personal data as follows:
- (a) account data, usage data, enquiry data and correspondence data will be retained for 90 days following the request for the deletion of your account, at the end of which period it will be deleted from our systems.
  - (b) notification data will be retained for 7 days following your request to unsubscribe, at the end of which period it will be deleted from our systems.
- 6.5 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## **7. Security of personal data**

- 7.1 We will take appropriate technical and organisational precautions to secure your personal data and to prevent the loss, misuse or alteration of your personal data.
- 7.2 We will store all your personal data on secure servers, personal computers and mobile devices, and in secure manual record-keeping systems.
- 7.4 Data that is sent from your web browser to our web server, or from our web server to your web browser, will be protected using encryption technology.

## **8. Amendments**

- 8.1 We may update this policy from time to time by publishing a new version on our website.
- 8.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 8.3 We may notify you of changes to this policy by email.

## **9. Your rights**

- 9.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:
- (a) the payment of a fee (currently fixed at GBP 10); and

- (b) the supply of appropriate evidence of your identity for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address.
- 9.2 We may withhold personal information that you request to the extent permitted by law.
- 9.3 You may instruct us at any time not to process your personal information for marketing purposes.
- 9.4 In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.
- 9.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are certain general exclusions of the right to erasure. Those general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.
- 9.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
- 9.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- 9.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you

make such an objection, we will cease to process your personal data for this purpose.

- 9.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- 9.10 To the extent that the legal basis for our processing of your personal data is consent, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- 9.11 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.
- 9.12 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 9.13 You may exercise any of your rights in relation to your personal data by written notice to us.

## **10. Third party websites**

- 10.1 Our website includes hyperlinks to, and details of, third party websites.
- 10.2 We have no control over, and are not responsible for, the privacy policies and practices of third parties.

## **13. Acting as a data processor**

- 13.1 In respect of personal data pertaining to events, proposals, evaluations, contributions and other personal data solicited by a Lineup Ninja Ltd. customer through their use of the software ("**event data**") we do not act as a data controller; instead, we act as a data processor.
- 13.2 Insofar as we act as a data processor rather than a data controller, this policy shall not apply. Our legal obligations as a data processor are instead set out in the contract between us and the relevant data controller.

## **14. About cookies**

- 14.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

## **15. Cookies that we use**

15.1 Lineup Ninja does not use cookies. However, it does store some the following data on your computer as Local Storage to allow the software to work properly:

(a) Storage:\* Persistent. Indefinite. Contains details of your application configuration.

(b) ember\_simple\_auth-session:\*. Persistent. valid for 1 hour, refreshable for 90 days. Contains authentication for connecting to our database service.

## **16. Cookies used by our service providers**

16.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

16.2 We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

16.3 We use Tidio to provide live chat service. You can view the privacy policy of this service provider at: <https://www.tidiochat.com/en/privacy-policy>.

16.5 We use LogRocket for fault diagnosis. You can view the privacy policy of this service provider at: <https://logrocket.com/privacy/>

16.6 We use YouTube to deliver video content. You can view the privacy policy of this service provider at: <https://www.youtube.com/intl/en-GB/yt/about/policies>

## **17. Managing cookies**

17.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

(a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);

(b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);

(c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);

(d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);

(e) <https://support.apple.com/kb/PH21411> (Safari); and

- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

17.2 Blocking all cookies will have a negative impact upon the usability of many websites.

## **19. Our details**

19.1 This website is owned and operated by Lineup Ninja Ltd.

19.2 We are registered in England and Wales under registration number 10733922, and our registered office is at 10 Lilac Grove, Victoria Park Avenue, Leeds, LS5 3AG.

19.3 Our principal place of business is at the above address.

19.4 You can contact us:

- (a) by post, using the postal address given above;
- (b) by email, using [hello@lineup.ninja](mailto:hello@lineup.ninja).