

Sensat Surveying Ltd

(Registered number 09869690)

PRIVACY POLICY

Last updated: December 2020

Sensat Surveying Ltd and its Group Companies (as defined below) (together, “**Sensat**”) understand that your privacy is important to you and that you care about how your personal data (as further defined in **Part 4** below) is used.

We respect and value the privacy and the privacy rights of everyone who visits this website, sensat.co.uk or any Site and will only collect and use personal data in ways that are described in this Privacy Policy, and in a way that is consistent with Sensat’s obligations and your rights under applicable law.

Please read this Privacy Policy carefully and ensure that you understand it; it applies to Sensat’s use of any and all data collected by Sensat in relation to your use of our Sites. Your acceptance of this Privacy Policy is deemed to occur upon your first use of any Site and you will be required to read and accept this Privacy Policy when signing up for an Account. If you do not accept and agree with this Privacy Policy, you must stop using our Sites and their services.

1. Definitions and Interpretation

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

“ Account ”	means an account required to access and/or use certain areas and features of a 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. Cookies contain information that is transferred to your computer’s hard drive. Details of the Cookies used by our Site are set out in Part 14 , below;
“ Cookie Law ”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003 (as amended in 2004, 2011 and 2015) and of EU Regulation 2016/679 General Data Protection Regulation (“ GDPR ”);
“ Group Company ”	means any undertaking which is a parent undertaking of Sensat Surveying Ltd or a subsidiary undertaking of Sensat Surveying Ltd or of any such parent undertaking (as such expressions are defined in sections 1159, 1161 and 1162 of the Companies Act 2006) and “ Group Companies ” means all of them; and
“ Site ”	means any website hosted or operated by Sensat Surveying Ltd (or any Group Company).

2. Information About Us

Our Sites are owned and operated by Sensat Surveying Ltd, a limited liability company registered in England and Wales under company number 09869690. The “data controller” (as defined in the Data Protection Legislation) in respect of your personal data will be Sensat Surveying Ltd.

- Registered address: 30 City Road, London, EC1Y 2AB
- Main trading address: 160 Old Street, London, EC1V 9BP
- VAT number: 229 146 408
- Data Protection Officer: Harry Atkinson
- Email address: harry.atkinson@sensat.co.uk
- Telephone number: +44 (0) 20 3488 2645

- Postal address: 160 Old Street, London, EC1V 9BP
- We are regulated by the Information Commissioner Officer (Registration number: ZA203170)

3. What Does This Privacy Policy Cover?

This Privacy Policy applies only to your use of our Sites and sets out how we will use any personal data that we receive, collect or generate in relation to our services and products and through our Sites and any other personal data you may provide to Sensat or which Sensat acquires as part of our day-to-day business.

Our Sites may contain hyperlinks to, and details of, third party websites. We have no control over, and are not responsible for, how your data is collected, stored, or used by other websites or the privacy policies and practices of third parties, and therefore advise you to check the privacy policies and practices of any such third parties 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 **Part 15**.
- b) The right to **access** the personal data we hold about you. **Part 13** 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 **Part 15** to find out more.
- d) The right to be **forgotten**, i.e. the right to ask us to erase, delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in **Part 15** 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. In certain cases, we may continue to process your information after you have withdrawn consent if we have a legal basis to do so or if your withdrawal of consent was limited to certain processing activities.
- 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. We do not use your personal data in this way.

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 **Part 15**.

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, for example if you change your email address or if you wish to cancel any request you have made of us, or if you become aware that we have inaccurate personal data about you, please let us know by contacting us using the details set out in **Part 15** above. We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal data that you provide to us.

Further information about your rights can also be obtained from the Information Commissioner's Office 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 however welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in **Part 15**.

Finally, even though we will take all reasonable steps to protect your personal data, we cannot guarantee the security of any personal data you disclose online. You accept the inherent security implications of disclosing personal data online.

6. What Data Do We Collect and How?

Many of the services offered by us require us to collect personal data about you in order to perform our services, evaluate our marketing activities and offer our products or services.

Depending upon your use of a 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 **Part 14** for more information about our use of Cookies and similar technologies and our Cookie Policy.

We **do not** collect any 'special category' or 'sensitive' personal data' relating to children or data relating to criminal convictions and/or offences. For these purposes, 'sensitive personal data' is data relating to racial or ethnic origin; criminal activity or proceedings in certain countries; political opinions; religious or philosophical beliefs; trade union membership, genetic data, biometric data, data concerning health or sex life or sexual orientation.

Data Collected	How We Collect the Data
Identity information including; name, title, date of birth	Form submission
Contact information including; email address, telephone number	Form submission
Business information including; business name, job title, profession	Form submission
Usage data including: IP address, web browser type and version, date of usage of services and/or login to any Site, email address of relevant user, as well as information about the timing, frequency and pattern of your service use.	Either automatically or via internal or external analytics tracking system

7. How Do We Use Your 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 basis for doing so:

What We Do	What Data We Use	Our Lawful Basis
Communicating with you, managing our relationship with you, keeping records of those communications and promoting our products and services to you.	Name, Email address, Telephone Number	Our legitimate interests, in particular managing our customer relationships. Sensat can contact you if you express an interest in our product by submitting a form.

Supplying you with information by email that you have opted-in-to (you may opt-out at any time by emailing contact@sensat.co.uk)	Name, Email address	Our legitimate interests, in particular in promoting our business, by using the data you provide to contact you with information related to your request and Sensat's product.
Analysing the use and pattern of use of a Site and our services	Email address, usage data (IP address etc)	Our legitimate interests, namely monitoring and improving our Sites and services and maintaining compliance with our internal policies and procedures.

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 and/or telephone and/or text message and/or post with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam.

We may process any of your personal data where necessary for the establishment, exercise or defence of legal proceedings. In such a scenario, the legal basis for this proceeding is our legitimate interests, by virtue of protecting and asserting our legal rights, your legal rights and, if required, the legal rights of others. In addition to the specific purposes for which we may process your personal data set out above, we may also process any of your personal data where such processing is necessary for compliance with legal obligations to which we are subject (such as anti-money laundering obligations).

We will never sell your personal data to third parties. However, in the course of business, we may hire third-party organisations to help us improve our Sites and services. These third parties include our web host provider or outside contractors we hire to perform marketing or to assist us in securing our Sites and/or monitoring the use of our Sites.

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 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 purpose, please contact us using the details in **Part 15**.

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, including for the purposes of satisfying any legal, accounting, or reporting requirements, and we will in any event keep your data for so long as we have your permission to keep it.

Notwithstanding the above, we may retain your personal data where such retention is required 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.

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

We will not routinely transfer your Personal Data to, or store it, outside the European Economic Area ("EEA"). If we do happen to store or transfer any of your data outside the EEA, we will take all reasonable steps to ensure that it is protected and transferred in a manner consistent with applicable legal requirements.

This may be done in a number of different ways, for instance:

- the country that we send the data to might be approved by the European Commission as offering an adequate level of protection for personal data;
- the recipient might have signed up to a contract based on “model contractual clauses” approved by the European Commission, obliging them to protect your personal data;
- where the recipient is located in the US, it might be a certified member of the EU-US Privacy Shield scheme; or
- in other circumstances the law may permit us to otherwise transfer your personal data outside the EEA.

We take note the recent judgment of the Court of Justice of the European Union in Case C-311/18 in respect of the validity of the Privacy Shield Decision (Decision 2016/1250 on the adequacy of the protection provided by the EU-U.S. Privacy Shield) and are actively monitoring further developments and guidance resulting from this judgment in order to ensure the safe handling and protection of any relevant personal data which may be processed in and/or transferred to the United States (which, in any event, will always be kept to a strict minimum and strictly for the purposes set out in **Part 7**).

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 who have a legitimate need to know and ensuring that they are subject to duties of confidentiality at all times. Sensat employees are required to follow all applicable laws and regulations, including in relation to data protection laws;
- 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.

When you contact us about your file, you may be asked for some personal data. This is a safeguard designed to ensure that only you, or someone authorised by you, has access to your file with us.

It is important to remember that the transmission of data via the internet may not be entirely safe or secure and you are therefore advised to take and put in place suitable precautions when transmitting data to us via the internet.

10. Do You Share My Personal Data?

We will not share any of your personal data with any third parties (other than Group Companies) for any purposes, subject to the following exceptions.

We may need to share your data if doing so is reasonably necessary to provide a service that you have required, provided that we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations and the obligations of any applicable and relevant third party under the law. In particular, we may need to share your personal data with third party agents and contractors for the purposes of enabling them to provide data analysis, customer support, storage and other services to us and any entity we may appoint from time to time to evaluate the effectiveness of the Sites. These third parties will be subject to appropriate confidentiality requirements and they will only use your personal data as described in this Privacy Policy.

If we sell, transfer, or merge all or parts of our business or assets, any relevant personal data of yours may be transferred to a third party as part of, and within the context, of such a sale, transfer or merger. 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; however we will not be able to give you the choice of having your data deleted or withheld from any such new owner of our business.

Likewise, we may compile statistics about the use of our Site (including data relating to traffic, usage patterns and user behaviour and numbers). We may from time to time share any such data with third parties (including, but not limited to, potential investors, affiliates and partners), provided that any and all such data will only be shared in accordance with, and within the limits of, applicable law.

In some limited circumstances, we may be legally required to share certain personal data, which might include your own, for example if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority and/or where the disclosure of your personal data is necessary for the establishing, exercise or defence of legal claims.

11. How Can I Control My Personal Data?

In addition to your rights under the Data Protection Legislation set out in **Part 5**, 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 using the links provided in our emails or at the point of providing your details).

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 from receiving unsolicited marketing. These services will not however prevent you from receiving marketing communications that you have consented to receiving.

12. Can I Withhold Information?

You may access 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 also restrict our use of Cookies. For more information, see **Part 14** and our Cookie 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 **Part 15**.

There is not normally any charge for a subject access request. However, 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 of receiving it. 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 (up to a maximum of three months from the date we receive your request) may be required. You will be kept fully informed of our progress.

14. Cookies

We use Cookies and similar technologies to distinguish you from other users of our Sites, to improve your experience when accessing our Sites, and to improve our Sites.

Our Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of our Site and to provide and improve our services.

Cookies do not give us access to your computer or any information about you, other than the data you choose to share with us. These Cookies are also not used to create behavioural profiles of users.

Before Cookies are placed on your computer or device, you will be informed that the relevant Site uses Cookies amongst others to provide you with an easier, more personalised experience as well as customise advertising. You will be informed that by virtue of continuing to use the Site, you will be deemed to have agreed to our use of Cookies and will have the opportunity to review our Cookie Policy. By providing such agreement to the placing of Cookies you are enabling us to

provide the best possible experience and service to you. If you decide to block Cookies, you will not be able to use all the features on our Sites.

Certain features of our Sites depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary” in that they are essential in order to enable you to move around our Sites and use its features, such as accessing secure areas. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may block these Cookies by changing your internet browser’s settings as detailed below, but please be aware that our Sites may not work properly if you do so.

Furthermore, our Sites use, or may use, analytics services provided by, amongst others, Google Analytics, LinkedIn, Hubspot, Wix, [ClientSuccess](#) and [Segment](#). Website analytics refers to a set of tools used to collect and analyse usage information and user behaviour (for example, about the number of people using our Sites and to better understand how they find and use our Sites), enabling us to better understand how our Sites are used. This, in turn, enables us to improve our Sites and the services offered through them.

The abovementioned analytics service(s) used by our Sites use(s) Cookies to gather the required information and to track web browsing behavior. Google Analytics, ClientSuccess and Segment have certified compliance with the EU-US Privacy Shield Framework set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the EEA to the United States.

You do not have to allow us to use these Cookies, however whilst our use of them does not pose any risk to your privacy or your safe use of our Sites, it does enable us to continually improve our Sites, making it a better and more useful experience for you.

The analytics service(s) used by our Sites use(s), or may use, the following Cookies:

Name of Cookie	First / Third Party	Provider	Purpose
UserMatchHistory	Third	LinkedIn	LinkedIn Ad analytics
_ga	Third	Google Analytics	Used to distinguish users
_guid	Third	LinkedIn	Used by the social networking service, LinkedIn, for tracking the use of embedded services.
_lipt	Third	LinkedIn	Allow the functionality of a share button
bcookie	Third	LinkedIn	Targeting/Advertising
lang	Third	LinkedIn	Remembers the user’s selected language version of a website
li_oatml	Third	LinkedIn	Used by the social networking service, LinkedIn, for tracking the use of embedded services.
liap	Third	LinkedIn	Used by the social networking service, LinkedIn, for tracking the use of embedded services.
lidc	Third	LinkedIn	Used by the social networking service, LinkedIn, for tracking the use of embedded services.
sdsc	Third	LinkedIn	These cookies are set by LinkedIn on the careers pages and are used for the 'Apply with LinkedIn' function.
BizoID	Third	LinkedIn	The BizoID cookie stores a unique LinkedIn user ID. Note: The LinkedIn user ID does not contain personally identifiable information.

TS01e85bed	Third	Wix	Wix.com Website Builder
TS01fe4caa	Third	Wix	Wix.com Website Builder
XSRF-TOKEN	Third	Wix	This cookie is written to help with site security in preventing Cross-Site Request Forgery attacks
_utma	Third	Google Analytics	Used to track each unique visitor to your website
_utmb	Third	Google Analytics	Keeps track of timeouts and the number of page views your website gets
_utmc	Third	Google Analytics	Keeping track of your website sessions
_utmz	Third	Google Analytics	Insights into each traffic source
_wixCIDX	Third	Wix	Pending
_wix_browser_sess	Third	Wix	Keeping track of your website sessions
__hstc	Third	Hubspot	Keeping track of your website sessions. It contains the domain, utk, initial timestamp, last timestamp, current timestamp, and session number (increments for each subsequent session).
hubspotutk	Third	Hubspot	This cookie is used to keep track of a visitor's identity. This cookie is passed to HubSpot on form submission and used when deduplicating contacts.
__hssc	Third	Hubspot	Keeps track of sessions. This is used to determine if HubSpot should increment the session number and timestamps in the __hstc cookie. It contains the domain, viewCount (increments each pageView in a session), and session start timestamp.
__hssrc	Third	Hubspot	Whenever HubSpot changes the session cookie, this cookie is also set to determine if the visitor has restarted their browser.
timezone	Third	Segment	Pending
fs_uid	Third	Segment	Pending
mutiny.user.token	Third	Segment	Pending
seg_xid	Third	Segment	Pending
tracking-preferences	Third	Segment	Pending
fbp	Third	Segment	Pending
seg_first_url	Third	Segment	Pending
ajs_anonymous_id	Third	Segment	Pending
intercom-id-l43lwj73	Third	Segment	Pending

mkjs_group_id	Third	Segment	Pending
mfa-call-to-action-2kc kVrWhzW	Third	Segment	Pending
mkjs_user_id	Third	Segment	Pending
auth_token	Third	Segment	Pending
ajs_user_id	Third	Segment	Pending

In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to accept, delete or disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access our Sites more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

15. How Do I Contact You?

To contact us about anything to do with this Privacy Policy, your personal data and data protection, including to make a subject access request, please use the following details:

- Email address: harry.atkinson@sensat.co.uk
- Telephone number: + 44 (0) 20 3488 2645
- Postal Address: 160 Old Street, London EC1V 9BP (for the attention of Harry Atkinson)

16. Changes To This Privacy Policy

We reserve the right to update and change this Privacy Policy from time to time in order to reflect any changes to the way in which we process your personal data, in light of changing legal requirements or if we change our business in a way that affects personal data protection.

Any changes will be posted on our Site and you will be deemed to have accepted the revised or updated terms of the Privacy Policy on your first use of our Site following the alterations; however any major changes to this Privacy Policy will be emailed to our mailing list. If you do not agree to any changes that we make, you should not use or access (or continue to use or access) our Site. We recommend that you check this page regularly to keep up-to-date and ensure you are happy and comfortable with any changes or updates to this Privacy Policy.