

# Privacy Policy Notice

This policy was last updated on 27 November 2018.

This privacy policy notice outlines the way in which we manage any personal data obtained or otherwise provided by or about you in the course of you:

- browsing or using our websites [www.scanprobe.com](http://www.scanprobe.com) and [www.mina.app](http://www.mina.app) (the “Websites”);
- using the “Mina” mobile app (the “App”); or
- engaging our services as a customer or supplier (the “Services”)

together, the “Scanprobe Services”).

The purpose of this policy is to explain to you how we control, process, handle and protect any personal information you submit while using or receiving the Scanprobe Services, including your rights under current laws and regulations. If you do not agree to this policy you may wish to cease using/receiving the relevant Scanprobe Services.

Policy key definitions:

- “I”, “our”, “us”, or “we” refer to Scanprobe Techniques Ltd (Company no. 02682996) of 99-105 Stanstead Road, Forest Hill, London, SE23 1HH, who will be the controller of your personal information for the purposes of the GDPR and other data protection regulations
- “you”, “the user” refer to the person(s) using the Websites and/or App.
- “GDPR” means General Data Protection Act.
- “PECR” means Privacy & Electronic Communications Regulation.
- “ICO” means Information Commissioner’s Office.

## How and why we use your personal data

Under the GDPR we control and / or process the following personal information about you electronically using the following lawful bases:

What data we collect/use about you	How and why we use this data	Lawful basis for processing your data
Name, email, phone, address, payment information and any other personal data you	Fulfilling your orders and performing the Services for you	Performance of a contract

submit as part of your correspondence with us		
Name, email and any other personal data you submit as part of your correspondence with us	Responding to any queries submitted in the course of our provision of the Services (e.g. through the contact forms on our Websites/App)	Performance of a contract
Name, email	Sending you important service communications regarding your order or the App (e.g. bug fixes or updates)	Legitimate interests (improving our service offering)
Name, email and certain technical information (see further details in “Marketing emails” below)	Adding you to our email marketing database and sending you the latest news and updates about our Services or the App	Consent
As required by relevant legal obligations	To comply with our legal and regulatory obligations, including under applicable data protection laws and preventing, investigating and detecting crime, fraud or anti-social behaviour	Compliance with our legal obligations
As required by relevant requirements of the claims	To effectively handle any legal claims or regulatory enforcement actions taken against us, and to protect us and our employees/customers by taking appropriate legal action against third parties	Legitimate interests (protecting and enforcing our legal rights)
Certain technical information regarding your visits to the Websites or use of the App, e.g. traffic data, location data, weblogs and other communication data	Marketing research and analytical purposes to improve and develop the Scanprobe Services	Legitimate interests (improving our service offering)

All the above categories of personal data will have been submitted by you directly or from our third party service providers in the course of them providing the Scanprobe Services on our behalf, including for example our business partners and sub-contractors in technical, payment and delivery services.

We will let you know at the point of collecting your information whether this is optional, or whether it is necessary for you to provide this information to meet certain statutory or contractual requirements. If the latter and you do not wish to provide us with this information, this may limit the services we are able to provide you.

If, as determined by us, the lawful basis upon which we process your personal information changes, we will notify you about the change and any new lawful basis to be used if required. We shall stop processing your personal information if the lawful basis used is no longer relevant.

## Who we share your personal data with

We do not sell, trade or rent your personal information to any third parties. However, in order to provide the Scanprobe Services to you we may need to share your information with the following third parties:

- Our suppliers and contractors where necessary to provide the Scanprobe Services or maintain our operations to enable us to do so, including our providers of IT, payment and electronic marketing services.
- Any potential or actual third party buyer of our business and/or assets in the event that we sell, trade or licence ownership of any part of our business or assets
- Third parties we may be required to disclose such personal data to in order to comply with our legal obligations or enforce our legal rights, e.g. any relevant authority or enforcement body and fraud protection and credit risk reduction agencies.

Some of these third parties may be based outside of the European Economic Area (including our provider of electronic marketing services, Campaign Monitor, whose services are hosted in the United States). We ensure that where such international transfers are needed, these will be made subject to appropriate safeguards as required by data protection laws to ensure a similar degree of protection is afforded to your personal data. Such measures include the use of EU Commission approved standard contractual clauses.

## How long we keep your personal data

We keep your data for as long as it's necessary to meet the relevant purposes for which we've collected your data, including for the purpose of satisfying any legal, accounting or reporting requirements.

To determine the appropriate length of time for holding your 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 purpose for which we process your data and whether we can achieve those purposes through other means, along with the applicable legal requirements.

In particular, we will retain copies of our customer legal contracts, agreements, data access requests, complaints requests and disputes for 6 years.

## Your individual rights

In certain circumstances you have rights under data protection laws in relation to the personal data we hold about you. You can request to:

- access information held about you.
- rectify any incorrect or incomplete data we hold about you. It is both in our interest and yours that any personal information we hold about you is accurate, complete and current. If the data we hold about you is inaccurate in any way, please contact us to have your personal information corrected.
- delete, restrict or remove the data we hold about you.
- transfer the data we hold about you to another party.
- object to any further processing of your data.

You can read more about [your rights in detail here](#).

If you have any concerns about how we handle your data, please contact us. If you are not satisfied after we've tried to resolve your issue, you'll be entitled to lodge a complaint with the ICO ([www.ico.org.uk](http://www.ico.org.uk)).

We handle all data subject requests in accordance with the GDPR, meaning we reserve the right to:

- refuse your request based on the exemptions set out in the applicable data protection laws.
- request for proof of your ID to process the request or request further information
- charge you a reasonable administrative fee for any repetitive, manifestly unfounded or excessive requests

If we refuse your request to exercise these rights, we will give reasons for our refusal and allow you to challenge our decision.

To submit a request, please contact us using the details set out in “Contact Us” below.

## Internet cookies

We use cookies on the Websites to provide you with a better user experience. A cookie is a small data file that our server sends to your browser when you visit the Websites. Cookies will be placed as small text files on your device / computer hard drive to track how you use the Websites, to record or log whether you have seen particular messages that we display, to display relevant adverts or content, referred you to a third party website.

Some cookies will be saved for specific time periods, where others may last indefinitely.

Your web browser should provide you with the controls to manage and delete cookies from your device, please see your web browser options. You can obtain information about how to manage cookies by clicking “help” on your browser’s menu or visiting [www.aboutcookies.org](http://www.aboutcookies.org). However, please note that while you can delete cookies at any time or set your browser to reject or disable cookies, you may not be able to access all or parts of our Websites.

Cookies that we use are:

## Data security and protection

We ensure the security of any personal information we hold by using secure data storage technologies and precise procedures in how we store, access and manage that information, in compliance with GDPR requirements.

## Marketing emails

Under the GDPR we use the consent lawful basis for anyone subscribing to our newsletter or marketing mailing list. We only collect certain data about you, as detailed in the "Processing of your personal data" above. Any email marketing messages we send are done so through Campaign Monitor, our email marketing service provider (“**EMS**”). An EMS is a third party service provider of software / applications that allows marketers to send out email marketing campaigns to a list of users.

Email marketing messages that we send may contain tracking beacons / tracked clickable links or similar server technologies in order to track subscriber activity within email marketing messages. Where used, such marketing messages may record a range of data such as; times, dates, I.P addresses, opens, clicks, forwards, geographic and demographic data. Such data, within its limitations will show the activity each subscriber made for that email campaign.

Any email marketing messages we send are in accordance with the GDPR and the PECR, and each message will provide you with instructions on how to withdraw your consent (unsubscribe) or manage your marketing communication preferences at any time.

## Changes to this policy

We may from time to time review and amend this Privacy Policy to take into account changes in law, technology and our operations. We will post any changes to this Privacy Policy on the Websites from time to time and, where appropriate, notify you by e-mail. All personal information held by us will be governed by the most recent Privacy Policy communicated by us by email or posted on the Websites.

## Contact us

If you have any queries relating to this privacy notice (including any requests to exercise your legal rights in respect of your data, you can contact us at [sales@scanprobe.com](mailto:sales@scanprobe.com) (in respect of the [www.scanprobe.com](http://www.scanprobe.com) website or Services) or [hello@mina.app](mailto:hello@mina.app) (in respect of the App or [www.mina.app](http://www.mina.app) website).