



PRIVACY POLICY

Who we are. LANCE Platform Limited (company number: 06595918) (**We**) are committed to protecting and respecting your privacy.

How to contact us. You can contact us by writing to us at WeWork Offices, No.1 Spinningfields, Quay Street, Manchester, M3 3JE, United Kingdom or info@lanceplatform.com or by phoning us on (+44) 0161 791 1569.

Data Protection Officer. Our data protection officer is Andy Sharp.

About this policy. This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us when:

- (i) registering for and using our software platform located at app.lanceplatform.com (**Software**) (along with any agreement we have entered into with you or your business/employer in respect of the Software); and
- (ii) browsing our website at www.lanceplatform.com (**Website**).

It also provides information about the various rights you have in respect of the personal data we hold about you and how to exercise these.

By using the Website and/or our Software you are accepting our use of your personal data in this way.

What personal data do we hold about you?

When using the Software, the data inputted should not identify any individual in respect of which you are generating the report. This means you should not input their name, address, identification number or any other identifying feature.

When you register for the Software. We will collect your full name, email address, telephone number, name of your business/your employer and your jurisdiction. This will apply whether you are registered for trial or full access use of the Software.

When you use the Software. We may collect certain technical and usage data when you use the Software, this includes: your IP address, screen resolution, device type, operating system and browser type, mouse events, key presses, referring URL and domain, pages visited, geographic location (country), preferred language and date and time of access. Again, this will apply whether you are registered for trial or full access use of the Software.

When you browse our Website. We may collect your IP address. We may also collect your name, contact details and any personal data contained in your message when you communicate with us through our Website.

The technical and usage data set out above which we collect when you use the Software and your IP address which we collect when you browse our Website are collectively referred to as **Technical and Usage Data**.

Please also see our cookies policy for further information about the cookies we may set when you access our Website.

We may aggregate Technical and Usage Data to review how our Software is being used. This aggregated data will not identify you.

How do we use the personal data we hold about you and what lawful basis do we rely on for doing so?

Where you or your business/employer have registered for and use the Software. We use your personal data for the purpose of providing the Software and the services to you and, where you have registered for full access to the Software, enabling you to access any output generated by the Software at a later date (subject always to the terms of

any agreement we have with you in respect of the Software). Our lawful basis for using your personal data is to carry out a contract entered into between us and you or your business/employer for the provision of the Software.

If you opt-in at the time you sign up for the Software or at a later date, we may send you messages about products, services and offers we think may be of interest to you. You can ask us to stop sending you marketing messages at any time by following the opt-out links on any message sent to you or by contacting us at any time using the details below. If you choose to receive our messages when you sign up to access our Software on a trial basis, you will continue to receive our messages even if you or your business/employer do not decide to proceed with full access to the Software, unless you tell us you do not wish to continue to receive such messages. Our lawful basis for using your personal data to contact you about our products and services is consent.

Where you have used the Software on a trial basis, we may also contact you following expiry of your trial period to collect your feedback and discuss subscription to our full access Software. Our lawful basis for doing so is that it is necessary for our legitimate interest of developing our service, the Software and growing our business by improving the Software and increasing Software users. If you do not want us to contact you following your trial, you may opt-out at the time you sign-up to receive the trial.

We use Technical and Usage Data to understand how users use our Software and our Website, being able to address faults and maintain security and improving our Software and Website. Our lawful basis for this use is that it is necessary for our legitimate interests (being those reasons specified). We rely on your consent to the setting of cookies and other electronic identifiers, please see our cookies policy for further information.

Sharing your personal data.

We use a third party hosting service (currently Amazon Web Services) to host the Software and an analytics and feedback provider (currently Hotjar Ltd) to assist us in monitoring Software faults and issues so we can provide our customer support services and improve our Software and your personal data may be transferred to these service providers for these purposes. If you are a user within the European Economic Area (EEA), we will not transfer your data outside of the EEA.

Required disclosures to third parties.

We may make the following disclosures of your personal information to third parties where required:

- (i) In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- (ii) If LANCE Platform Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its users may be one of the transferred assets.
- (iii) If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply the licence terms in respect of the Software; or to protect the rights, property, or safety of LANCE Platform Limited, our clients or users, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Where we store your personal data.

Where you are a resident in the EEA, we will not transfer any personal data we collect from you to a destination outside the European Economic Area.

How we will protect your data.

All personal data you provide to us is stored on our secure servers, hosted by AWS which has in place network and web application firewalls, encryption in transit, monitoring tools and access controls. These security measures are monitored and may be updated from time to time.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted using our Software or the Website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

How long we will store your personal data.

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. Our retention periods will depend on why we are holding your personal data.

- (i) **For the purpose of trial access to the Software:** We will retain your personal data for up to 12 months after the expiry of the trial period unless you sign up for full use of the Software, or we are required by law to retain it for longer;
- (ii) **For the purpose of full access to the Software:** We will retain your personal data for up to six years after you cancel your full use of the Software;
- (iii) **For the purpose of responding to a message submitted by our Website:** We will retain your personal data when you message us through the Website for up to 6 months after the last communication with you (unless you sign up to access the Software, in which case the retention periods above will apply); and
- (iv) **For the purpose of technical analysis:** When using the Software or the Website, we will retain Technical and Usage Data for three months following collection.

We may delete your personal data earlier than this if you leave the employment/engagement of a company to which we provide the Software. We may also retain your personal data for a longer period in the event of a complaint or contemplation of legal proceedings.

You have various rights in respect of your personal data.

You have various rights in respect of your personal data, as follows:

- (i) a right of access to a copy of the personal data we hold about you;
- (ii) a right to object or restrict processing that is likely to cause or is causing damage or distress to you, and a right to restrict ;
- (iii) a right to object to decisions being taken by automated means;
- (iv) a right in certain circumstances to have inaccurate personal data rectified, blocked, erased or destroyed;
- (v) a right to request a transfer of your personal data;
- (vi) a right to withdraw consent at any time; and
- (vii) a right to claim compensation for damages caused by a breach of the Act.

If you wish to exercise any of these rights, please contact us at info@lanceplatform.com or by phone on (+44) 0161 791 1569.

We may make changes to our privacy policy. Any changes we make to our privacy policy in the future will be notified to you the first time you use the Software following such change, and this policy will be available to you on the Website.

Your right to make a complaint in respect of our use of your personal data. You have the right to complain in respect of our use of your personal data. If you are a UK resident, your complaint would normally be addressed to the Information Commissioner's Office. Please contact us before you escalate your complaint.

You can contact us in respect of your personal data. Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to WeWork Offices, No.1 Spinningfields, Quay Street, Manchester, M3 3JE, United Kingdom or info@lanceplatform.com