

PRIVACY NOTICE

INTRODUCTION

This privacy policy was last updated on 16 January 2023.

This privacy policy tells you how Compaynet uses your personal data when you visit our website, interact with us, and subscribe to our services.

It also tells you about your privacy rights and how the law protects you.

It is important that you read this privacy policy, together with any other privacy policies we may provide, so that you are fully aware of how and why we are using your data.

If you have any questions, or would like to exercise your privacy rights, please follow the instructions in this privacy policy. See How to contact Compaynet about privacy below.

OUR WEBSITE AND THE COMPANY BEHIND COMPAYNET

Our website at [Cportal.compaynet.com](https://cportal.compaynet.com) is the customer facing web presence that introduces the Compaynet software and enables access to the software, submission of questions and support requests. This website is not intended for children, and we do not knowingly collect data relating to children.

Compaynet is made up of the following legal entity:

An England and Wales Corporation with the following legal name and address: Compaynet Ltd, Company Number 10373566, of 1st Floor, Sackville House, 143-149 Fenchurch Street, London, England, EC3M 6BN.

Compaynet Ltd is the data controller responsible for this website and any handling of personal data carried out by or on behalf of Compaynet Ltd.

When we mention “Compaynet”, “we”, “us” or “our” in this privacy policy, we are referring to Compaynet Ltd, which is the company responsible for handling your private data.

OUR COMMITMENT TO YOUR PRIVACY

The privacy of your data is a big deal to us. We’ll only ever access your account to help you with a problem or fix a software bug. We’ll never open any uploaded files unless you ask us to. We log all access to all accounts by IP address, so we can always verify that no unauthorized access has happened for as long as the logs are kept.

This policy applies to personal data from the European Union, the United Kingdom, and from Switzerland that is collected, used, and retained by us in the United States.

LAW ENFORCEMENT

While we may be required to disclose your personal information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements, Compaynet won’t otherwise hand your data over to law enforcement unless a court order says we have to. We flat-out reject such other requests from local and federal law enforcement when they seek data without a court order. And unless we’re legally prevented from it, we’ll always inform you when such requests are made.

THIRD PARTY

You understand that Compaynet uses third-party vendors and hosting partners to provide the necessary hardware, software, networking, storage, and related technology required to provide you with our services. These service providers may have access to your personal information. A current list of vendors is available upon request.

PERSONAL DATA THAT WE COLLECT

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 collect a variety of information about our wonderful customers (you!) and visitors to the Compaynet website. This personal data falls into these categories:

Identity Data includes title, first name, last name, username or similar identifier and an encrypted version of your login/password. If you interact with us through social media, this may include your social media username.

Contact Data includes billing address, delivery address, and email address.

Financial Data includes encrypted token data that links your account to your billing method details, which are stored by our 3rd party payment processors.

Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us or from our lending partners, underwriters, acquiring banks and payment processors.

Profile Data includes your username and password, purchases or orders made by you, preferences, feedback and survey responses, as well as any profile data which we have added (for example, using analytics and profiling).

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.

Usage Data includes information about how you use our website, products and services.

Tracking Data includes information we or others collect about you from cookies and similar tracking technologies, such as web beacons, pixels, and mobile identifiers.

Marketing and Communications Data includes your preferences in receiving direct marketing from us and our third parties and your communication preferences.

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.

The information we collect is used to improve the content of our Web pages and the quality of our service, and is not shared with or sold to other organizations for commercial purposes, except to provide products or services you've requested, when we have your permission, or under the following circumstances:

It is necessary to share information in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of Terms of Service of the specific application, or as otherwise required by law.

We transfer information about you if Compaynet is acquired by or merged with another company. In this event, Compaynet will notify you before information about you is transferred and becomes subject to a different 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. If you use any of these types of personal data on any functionality you design or create on Cportal.compaynet.com, we will not be able to tell. We will treat all the personal data included in any created functionality as ordinary personal data.

Remember, if you choose not to share personal data with us, or refuse certain contact permissions, we might not be able to provide our services to you or your organization.

INFORMATION GATHERING AND USAGE

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

When you register for any Compaynet product we may ask for information such as your name, company name, email address, billing address, credit card information.

Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by mail, phone, email or through chat or social media.

This includes personal data you provide when you:

Sign up to view a Recorded Webinar;

Sign up for a Free Trial;

Submit a Contact Form;

Submit a Feature Request Form;

Submit a General Enquiry Form;

Send us an email;

Engage with us on social media;

Enter a promotion or survey;

Contact customer services; or

Leave comments or reviews on our products or services (please be kind!).

Automated technologies or interactions. As you interact with us, including via the Cportal.compaynet.com website, we may automatically collect Technical Data about your equipment, browsing actions and patterns.

Third parties or publicly available sources. We may receive personal data about you from various types of third parties, including:

Technical Data and/or Tracking Data from analytics providers, advertising networks and search information providers;

Contact, Financial and Transaction Data from providers of payment and fraud prevention services;

Identity and Contact Data from data partners; and

Data from any third parties who are permitted by law or have your permission to share your personal data with us, such as via social media or review sites We will only use your personal data when the law allows us to.

We use collected information for the following general purposes: products and services provision, billing, identification and authentication, services improvement, contact, and research. Compaynet does not share your personal information with third parties, unless explicitly approved by you.

Tracking Data includes information we or others collect about you from cookies and similar tracking technologies, such as web beacons, pixels, and mobile identifiers. Marketing and Communications Data includes your preferences in receiving direct marketing from us and our third parties and your communication preferences.

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. If you use any of these types of personal data on products you design or create on Cportal.compaynet.com, we will not be able to tell. We will treat all the personal data included in designs or products as ordinary personal data.

Remember, if you choose not to share personal data with us, or refuse certain contact permissions, we might not be able to provide the products and services you've asked for.

COOKIES

A cookie is a small amount of data, which often includes an anonymous unique identifier, that is sent to your browser from a web site's computers and stored on your computer's hard drive.

Cookies are required to use the Compaynet services.

We use cookies to record current session information, but do not require permanent cookies.

YOUR LEGAL RIGHTS & GDPR

You may have heard about the General Data Protection Regulation ("GDPR") in Europe. GDPR gives people under its protection certain rights with respect to their personal information collected by us on the Site. Accordingly, Compaynet recognizes and will comply with GDPR and those rights, except as limited by applicable law. The rights under GDPR include:

Right of Access. This includes your right to access the personal information we gather about you, and your right to obtain information about the sharing, storage, security and processing of that information.

Right to Correction. This is your right to request correction of your personal information.

Right to Erasure. This is your right to request, subject to certain limitations under applicable law, that your personal information be erased from our possession (also known as the “Right to be forgotten”). However, if applicable law requires us to comply with your request to delete your information, fulfillment of your request may prevent you from using Compaynet’s services and may result in closing your account.

Right to Complain. You have the right to make a complaint regarding our handling of your personal information with the appropriate supervisory authority. A list of Supervisory Authorities is available here: https://edpb.europa.eu/about-edpb/board/members_en

Right to Restrict Processing. This is your right to request restriction of how and why your personal information is used or processed.

Right to Object. This is your right, in certain situations, to object to how or why your personal information is processed.

Right to Portability. This is your right to receive the personal information we have about you and the right to transmit it to another party.

Right to not be subject to Automated Decision-Making. This is your right to object and prevent any decision that could have a legal, or similarly significant, effect on you from being made solely based on automated processes. This right is limited, however, if the decision is necessary for performance of any contract between you and us, is allowed by applicable European law, or is based on your explicit consent.

Many of these rights can be exercised by signing in and directly updating your account information. If you have questions about exercising these rights or need assistance, please contact us at privacy@Cportal.compaynet.com.

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 may 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.

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 in How to contact Compaynet about privacy below.

DATA STORAGE

Compaynet uses third party vendors and hosting partners to provide the necessary hardware, software, networking, storage, and related technology required to run our services. Although Compaynet owns the code, databases, and all rights to the Compaynet applications, you retain all rights to your data.

DISCLOSURE

Compaynet may disclose personally identifiable information under special circumstances, such as to comply with subpoenas or when your actions violate the Terms of Service of any of our applications.

CHANGES

Compaynet may periodically update this policy. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address specified in your Compaynet service primary account holder account or by placing a prominent notice on our site. You retain the right to access, amend, correct or delete your personal information where it is inaccurate at any time. To do so, please contact privacy@Cportal.compaynet.com

QUESTIONS

Any questions about this Privacy Policy should be addressed to privacy@Cportal.compaynet.com or by mail at: Compaynet Ltd, of 1st Floor, Sackville House, 143-149 Fenchurch Street, London, England, EC3M 6BN.