# **Pax Systems Privacy Policy**

LAST UPDATED: November 2022

#### Introduction

Pax Systems Limited (**we or us**) cares about the privacy of your personal information and is committed to protecting it. This Privacy Policy (**Policy**) explains what information we collect about you and why, what we do with that information, and how we handle that information.

For the purposes of the applicable data protection laws (the General Data Protection Regulation (Regulation (EU) 2016/679) (**GDPR**), together with any implementing legislation, in particular, the Data Protection Act 2018), the company responsible for your personal information is Pax Systems. This applies to information obtained by us through correspondence and material provided to us, including made available through the Paxsystems.co.uk website (**Website**) and direct communication over email or other means.

#### **Collection of your Personal Information**

Pax Systems collects information that, alone or in combination with other data, could be used to identify you (**Personal Information**), such as your e-mail address, name, physical address, telephone number, or company information. Pax Systems may also collect anonymous demographic information which is not unique to you, such as your postal code and preferences (**Non-Personal Information**). Non-Personal Information is not linked to your Personal Information (for example, your IP address).

Pax Systems will collect your Personal Information in a number of ways, including when you contact us through the Website, by telephone, post, e-mail or through the other means set out below.

# Information you provide when you register an account

When you register a Pax Systems account, you voluntarily give us certain Personal Information, including your:

• Name, address and e-mail address.

#### Other information we collect

We also collect this Personal Information as you use the Website:

• User Content. This consists of all requests, communication or information otherwise transmitted by you in connection with your use of the Website.

#### Automatically collected information

When you visit our Website, we automatically collect information about your computer hardware and software such as your IP address, browser type, domain names, access times, operating system, cookie information, referring website addresses, pages visited, links clicked, text entered, and Internet Service Provider. We analyse and use this information to better understand how our users use the service, to maintain and improve our service, and in some cases, to publicly disclose aggregated statistics regarding our services.

#### **Use of your Personal Information**

Pax Systems collects and uses your Personal Information as necessary to perform our contract with you and for our legitimate business interests, including to:

- operate the Website and communicate with you about the services available.
- deliver the services, communicate with you about the services you use, as well as respond to requests for assistance, including product support if you've having difficulty accessing your account or with the products purchased.
- understand and improve how our users use and interact with our services.
- publicly disclose aggregated statistics regarding purchases.

When you register with us and set up an account to receive our services, the legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract. When we progress, any payment made by you, we process your Personal Information to prevent or detect fraud, including fraudulent payments. The legal basis for this processing is compliance with our legal obligations.

All financial transactions progressed through invoice and bacs transfer. No payment or card details are collected or processed by Pax Systems.

With your consent, we may send you direct marketing emails and reference the service provided on our website.

#### **Storage of Personal Information**

Unless a longer retention period is required or permitted by law, we will only hold your Personal Information on our systems for the period necessary to fulfil the purposes outlined in this Policy, or until you request that the information be deleted in accordance with your right of erasure (see "Your rights" section below).

Even if we delete your Personal Information, we reserve the right to maintain a copy for legal, tax or regulatory purposes, but in such event, we will do so only as long as necessary to fulfil those legal, tax or regulatory purposes.

#### **Personal Information access and disclosure**

We will only disclose Personal Information to third parties:

- when we use solicitors and service providers to assist us in meeting business or operating needs, such as providing services, hosting our Website, communicating with you, delivering and improving our services, e-mail communication, invoicing and payments, customer support services and analytics. These service providers may only access, process or store Personal Information pursuant to our instructions and to perform their duties to us, and in accordance with applicable laws and regulations; or
- when we have your explicit consent to share your Personal Information; or
- when we determine that disclosure is required to protect the rights, property, or personal safety of Pax Systems and users of our services, or to respond to lawful subpoenas, warrants, or requests by public or regulatory authorities, including requests by law enforcement authorities; or
- if we sell some or all of our business or assets, we may disclose your Personal Information to the prospective seller or buyer of such business or assets, and if the transaction closes, then your Personal Information may be transferred to the buyer.

#### Data security & integrity

Pax Systems is committed to taking reasonable and appropriate steps to protect the Personal Information that we hold from misuse, loss, or unauthorised access. We do this by using a range of technical and organisational measures including measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your personal information, please **let us know** immediately.

The Personal Information you provide is secure on computer servers in a controlled, secure environment, with protections from unauthorised access, use or disclosure. When Personal Information (such as a name, email address) is transmitted to our websites, it is protected through the use of encryption, such as the Secure Socket Layer (SSL) protocol.

However, while we do our best to protect your Personal Information, we cannot guarantee the security of all data which is transmitted to the Website or to another website via the internet or similar connection. If we have given you (or you have chosen) a password to access certain areas of the Website, please keep this password safe.

## Your rights

Under the GDPR, you have various rights in relation to your Personal Information, such as the rights of access, rectification, restriction, objection, portability, and erasure. Please note that these rights are subject to certain limitations set forth in applicable law.

To exercise these rights, please contact our **Data Protection Officer**. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of applicable laws. Please note that we may keep a record of your communications to help us resolve any issues you raise.

# **Complaint resolution**

If you believe that we have not complied with this Policy or your data protection rights, you have the right to file a complaint with the UK <u>Information Commissioner's Office</u>, however, we hope that you'll attempt to resolve the complaint with us first. Please **contact us** for more information.

# Children

We do not intend to solicit or collect Personal Information from anyone under the age of 18. If you are under 18, do not enter information on this Website or engage our services. If you believe a child of yours under the age of 18 has entered Personal Information, please contact us to have the data removed.

#### **Changes to this Policy**

We will occasionally update this Policy to reflect company and customer feedback. Pax Systems encourages you to periodically review this Policy to be informed of how we are protecting your Personal Information.

## **Contact information**

Pax Systems welcomes your comments regarding this Policy. Please contact us at <u>sales@Pax</u> <u>Systems.co.uk</u>, or write to us at:

Data Protection Officer Pax Systems Ltd Alban House 99 High Street South Dunstable LU6 3SF