

Privacy Policy

Information We Process

1. **Information you provide.** We store a limited amount of personal data that you directly provide us through our websites and software services,
2. **Incidental content.** We often store information obtained from other computer systems, not controlled by us. If this content becomes linked to you in our services, then it is within scope of this policy. For instance “comment” content that you create in a system we interface with that incidentally is transmitted to us.
3. **Other data submitted by you.** We collect other data that you submit to our websites or services as you participate in any interactive features of the services, participate in a survey, contest, promotion, sweepstakes, activity or event, apply for a job, request customer support, communicate with us via third party social media sites or otherwise communicate with us.
4. **Computer Logs.** As is true with most websites and services delivered over the Internet, we gather certain information and store it in log files when you interact with our services. This information includes internet protocol (IP) addresses as well as browser type, internet service provider, URLs of referring/exit pages, operating system, date/time stamp, information you search for, locale and language preferences, identification numbers, associated with your Devices, your mobile carrier, and system configuration information. Occasionally, we connect Personal Data to information gathered in our log files as necessary to improve the services for individual customers. In such a case, we would treat the combined information in accordance with this privacy policy.
5. We collect information as a result of running queries against information across our user base for the purposes of generating “**Aggregated Data**”. Aggregated Data is aggregated data about a group that does not contain Personal Data. For example, we may query our data to determine how often certain types of users reach their goals. When we use Aggregated Data we ensure no personal data is present, and that the organisations or customers who originally provided cannot be identified directly or indirectly, even if they are not natural persons.
6. **Cookies and Other Tracking Technologies.** We use various technologies to collect information, such as cookies and web beacons. Cookies are small data files stored on your hard drive or in device memory. We use cookies to improve and customize the services and your experience; to allow you to access and use the services without re-entering your username or password;

and to count visits and understand which areas and features of the services are most popular. You can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from websites you visit. If you do not accept cookies, however, you may not be able to use all aspects of the services. We also use javascript, e-tags, "ash cookies", and HTML5 local storage to collect information about your online activities over time and across different websites or online services.

How we use the Personal Data we collect

7. We use the information we collect about you to:
 - a) Provide, operate, maintain and promote the services;
 - b) Identify you and enable you to use the services;
 - c) To personalise the services to you;
 - d) Send you messages, including responding to your comments, questions, and requests; providing customer service and support; and sending you technical notices;
 - e) Send promotional communications, such as providing you with information about services, features, surveys, newsletters, offers, promotions, contests, events and providing other news or information about us and our select partners. You have the ability to opt out of receiving any of these communications as described below under "Your Choices"; or
 - f) Monitor and analyze trends, usage, and activities in connection with the services.

8. We use Aggregate Data that we generate extensively to understand how the services are being used and improve upon them. We also use the Aggregate Data to provide advice to our clients, and we may use it for public statements such as a press release.

Information Disclosure

9. We are the controller and processor of the personal data provided and other than to provide the Neuro services you use, we will not share your personal data with a third party except:
 - a) where required to do so by law;
 - b) with your express consent;
 - c) where data has been compiled into "Aggregated Data" and no longer identifies any natural person or corporate entity;

- d) where you consent to the sharing of piece of information through the services; or
- e) where we nominate a third party processor subject to and in compliance with UK and EU legislation, or codes of conduct as defined in Article 40 of GDPR¹.

Data Security

- 10. All data will be stored within the UK or the EU, except where the country has been permitted by Article 45 of GDPR¹, or alternative adequate safeguards are determined in line with Article 46 of GDPR¹.
- 11. The servers on which Personal Data is stored are kept in a secure environment. While we take reasonable efforts to guard your Personal Data, no security system is impenetrable and due to the inherent nature of the Internet as an open global communications vehicle, we cannot guarantee that information during transmission through the Internet or while stored on our systems or otherwise in our care, will be absolutely safe from intrusion by others, such as hackers.
- 12. Where data is transmitted over the internet it will always be encrypted using industry standard SSL (HTTPS).

Your Choices

- 13. You can opt out of receiving marketing materials or promotional communications by using the unsubscribe link within each email, or by emailing us at support@pglabs.co.uk. You can still use the services after opting out of this.
- 14. You have the right to see the information we hold about you. Copies can be requested by sending a request to support@pglabs.co.uk.
- 15. Information stored about Neuro users will be destroyed when they terminate their account by sending a request to support@pglabs.co.uk.