

# DIGISEQ

**Digiseq Limited**

## **Customer Data Privacy Policy**

**Version 1.2**

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# 1 Introduction

## 1.1 Purpose

Digiseq respects the rights of the consumer with regards to data privacy and data protection when they communicate (online or offline) with Digiseq through website and mobile applications. This Privacy Notice states how Digiseq collects, stores, uses, shares, processes and protects the personal information about consumers.

## 1.2 Audience

This Policy is applicable to all Digiseq staff and staff contracted to Digiseq.



## 2 What does this Privacy Notice apply to?

This Privacy Notice applies to personal information that Digiseq collects from or about consumers or customers through the methods described in this section. Please note that personal information that is collected via one method (e.g., a website) with personal information that is collected via another method (e.g., an offline event) may be combined.

This is done so as to obtain a more complete view of Digiseq's customers, which, in turn, allows Digiseq to serve the customer better and with more refined customisation.

### 2.1 Digiseq Websites

This refers to any consumer-directed websites operated by Digiseq, including websites that are operated under Digiseq's domains/URLs and websites that are run on third party social networks such as Facebook (e.g. Facebook fan page).

### 2.2 Digiseq Mobile sites/applications

This refers to any consumer-directed mobile sites or applications operated by Digiseq, including smartphone apps (e.g., iPhone apps).

### 2.3 Support Centres

This refers to personal information that is collected from consumers through the Digiseq support centre, for example if a consumer requires support during a provisioning process.



## **3 What information does Digiseq collect?**

### **3.1 Introduction**

Depending on how the consumer interacts with Digiseq (online, offline, over the phone, etc.), various types of information (personal and aggregate), may be collected, as described in this section.

Personal information (as used in this Privacy Notice) refers to such types of information that can be used to personally identify you, whereas aggregate information does not allow for such identification on its own.

In some instances (and unless otherwise stated below), information may be combined or linked with other types of information (e.g., personal contact information with account login and/or demographic information) and then stored together in Digiseq's records. In cases where personal and aggregate information are combined, such information will always be considered as personal information. Digiseq strives to limit the amount of personal information that is collected and stores only that which is reasonably necessary to provide the consumer with the relevant services. Personal information is generally stored for as long as an account is active or as needed to provide the consumer with the relevant services. Personal information may be stored for a longer period of time to comply with legal or regulatory obligations, resolve disputes, enforce Digiseq's agreements, or for records management purposes.

### **3.2 Personal Contact Information**

This includes any information that would allow Digiseq to contact the consumer personally, such as a name, home or mailing address, phone number (home, mobile phone, etc.), or email address. If a consumer creates an account with Digiseq, their personal contact information may be stored under their account profile.

### **3.3 Account login information**

This refers to any information that is required for the consumer to establish a unique account with Digiseq or for Digiseq to give the consumer access to their specific account profile. Examples may include a login ID/email address, screen name, password, and/or security question and answer. Digiseq only collects unique login information for those activities that require an account. Consumer login information, especially password, is expected to be kept confidential by the consumer and never shared with anyone else.

### **3.4 Demographic information**

This includes any information that describes the consumer demographic or psychographic characteristics. Examples may include a date of birth, age or age range, gender, geographic location (e.g., post code, city and state, mobile location).

### **3.5 Technical Computer Information**

This includes any information about the computer system or other technological device that is used to access one of Digiseq's websites, applications or services. Examples of technical computer information may include a computer's IP address, operating system type, and web browser type. If the consumer accesses a Digiseq website or application via a mobile device such as a smartphone, the collected information may also include a phone's unique device ID, and other similar mobile device data. See further Section 9 "Tracking Technology" below.



### **3.6 Website usage information**

This includes information about how the consumer uses and navigates Digiseq's websites and applications, including which pages or content is viewed and for how long, and other similar information and statistics about consumer interactions with a Digiseq website or application (e.g., date and time of visit, which site they came from and site activities, etc.). This information is captured using automated tracking technologies such as browser cookies, flash cookies, and web beacons, and may also be collected through the use of third party tracking services (such as Google Analytics) that collect data in aggregate (such as number of visits to a particular page, or the amount of time spent on a web site). Please refer to section 9 for further information

Digiseq does not partner with third party ad networks

### **3.7 Consumer feedback**

This includes information that the consumer voluntarily shares with Digiseq about their experience in using Digiseq's products and services, including Digiseq's websites and applications. Examples may include unsolicited comments and suggestions, testimonials, or other questions or feedback related to Digiseq products. Digiseq may collect this information in the form of consumer surveys, consumer panels, contact forms, "Ask the Expert" forms, and email correspondence.

### **3.8 Payment information**

This includes any information that the consumer uses to make a purchase, such as credit card details (cardholder name, card number, expiration date, etc.) or other forms of payment (if such are made available). This also includes the billing name and address associated with that form of payment. If the consumer creates an account with Digiseq when making a purchase, their payment information may be stored under their account profile. The consumer can review or edit this information.

### **3.9 Other information (depending on context)**

This refers to any other information that Digiseq might need to collect for a specific Digiseq form, feature, or other service that the consumer uses or requests. What this information includes will vary depending on the method of collection and the specific purpose(s) for which the information is being collected. Please see Section 4 "Uses of consumer personal information" for more specific examples.



## **4 Uses of consumer personal information**

The following paragraphs describe the various purposes and features for which Digiseq might collect and use personal information, and the different types of information that might be collected from the consumer through the different methods described in Question 1 above. Please note that not all of the uses below will be relevant to every consumer.

### **4.1 Account maintenance**

Digiseq may use personal information to maintain accounts with Digiseq, including administering any consumer loyalty or rewards programmes that are associated with the account. This typically involves the use of personal information that was originally collected to set up an account (e.g., personal contact information, payment information, account login information, demographic information, etc.)

### **4.2 Customer service**

Digiseq may collect and use personal information to provide customer service, including responses to customer inquiries. This typically requires the collection and use of certain personal contact information (such as your name or email address) and information regarding the reason for your inquiry (e.g., order status, technical issue, product question/complaint, general question, etc.). Customer service may be provided through various forms of communication, including email correspondence, call centre support, and live online chat features

### **4.3 Website improvement and personalisation**

Digiseq may collect and use consumer information to improve and personalise the experience on Digiseq's websites and applications. This is typically done through automated tracking technologies (see also Section 9) that collects and retains certain account login information, technical information, and/or previous website usage information. For example, Digiseq might record a login ID/email address or screen name so the consumer can quickly login the next time they visit Digiseq's site.

### **4.4 Order fulfilment**

Digiseq may collect and use personal information to process and deliver orders, and to inform the consumer about the status orders. This could involve the collection and use of certain personal contact information, payment information, account login information, and/or other information related to the purchase (such as products ordered). This could also involve the on-going storage of the consumer payment information to allow for easier checkout on future purchases. Where orders are being fulfilled by a third party, Digiseq will share the consumer personal information with the third party for the purposes of fulfilment of the order. As a result of this, the customer, also receive communications from that third party (whether by email, SMS or other methods of communication) regarding the fulfilment of the order.

### **4.5 Other general purposes (e.g. website security, internal research)**

Digiseq may collect and use consumer information for other general business purposes, such as to maintain the day-to-day operation and security of Digiseq websites. These activities mostly require the collection and use of certain demographic information, technical computer information, website usage information, and consumer feedback.



## 5 Protection of personal information

Digiseq takes all necessary technical and organisational measures to protect the confidentiality and security of personal information collected through the various methods described in this Privacy Notice. These efforts include, but are not necessarily limited to:

1. storing personal information in secure operating environments that are not available to the public and that are only accessible to authorized Digiseq employees, and Digiseq's service providers, agents and those with whom Digiseq has contracts;
2. using industry-standard SSL encryption (or similar) to protect the security of certain sensitive personal information (such as credit card information, health or patient information) during transmission, and,
3. verifying the identities of registered users before they can access the personal information Digiseq maintains about them.



## **6 What happens if the customer refuses to provide personal information**

If the consumer chooses not to submit any personal information when requested, they may not be able to participate in certain activities and personalised features and may limit the services and offers Digiseq can provide. If the consumer refuses to provide a credit card number, they will not be able to purchase products through Digiseq. Simply to browse Digiseq's websites and learn more about Digiseq products, the consumer does not need to give any personal information.

## **7 To whom does Digiseq disclose personal information and why?**

Digiseq will never share personal information with any third party that intends to use it for direct marketing purposes unless Digiseq has specifically informed the consumer and they have given us specific permission to do this.

Digiseq may share personal information with third parties (some of whom are outside the EEA), but only in the following circumstances:

### **7.1 Service providers, Agents and contractors**

Digiseq may use third parties, like service providers, agents or contractors to provide support for the internal operations of Digiseq's websites, applications and online advertisements and to assist us with administering Digiseq's websites and applications. Some of these third parties may be located outside the country where the consumer accessed this website. These third parties and its employees may come into contact with personal information in the course of providing their services to us. Any such third party must at all times provide equivalent levels of security for personal information as Digiseq and, where required, are bound by a legal agreement to keep your personal information private, secure and to process it only on the specific instructions of Digiseq

### **7.2 Legal and Business transfers**

Digiseq may also disclose personal information if we are required to do so by law, or if in our good faith judgment, such action is reasonably necessary to comply with legal processes, to respond to any claims, or to protect the safety or rights of Digiseq, its customers, or the public. In the event of a merger or acquisition of all or part of Digiseq by another company, or in the event that Digiseq were to sell or dispose of all or a part of the Digiseq business, the acquirer would have access to the information maintained by that Digiseq business, which could include personal information. Similarly, personal information may be transferred as part of a corporate reorganization, insolvency proceeding, or other similar event, if permitted by and done in accordance with applicable law.

### **7.3 Aggregate information**

Digiseq may share aggregated demographic or survey information with third parties, but this information is in an anonymous form and does not contain any personal information. The aggregate information that Digiseq may share may include anonymous information that is captured through the use of cookies and other similar tracking technology, as explained in Section 9.



## 8 Consumer access and modification of their personal information

The following outlines the choices the consumer has with respect to the collection and use of personal information by Digiseq

### 8.1 The consumer can opt out

The consumer always has the option not to share any of their personal information with us. However, if they choose this option, they will be limited in the activities and features that Digiseq provides, as mentioned in Section 6 above.

## 9 Tracking technology

Digiseq may make use of tracking technologies (for example “Cookies”, “IP Addresses”, Log Files”, “Web Beacons”, “Tagging”) to gather certain information such as browser type and operating system, referring page, path through site, domain of ISP etc. for the purpose of improving the use and functionality of Digiseq websites and other purposes described below. Tracking technologies help Digiseq tailor their websites to the personal needs of the customer.

### 9.1 Cookies

Digiseq uses Cookies to improve the use and functionality of Digiseq’s websites and to understand better how visitors use Digiseq’s websites and the tools and services offered on it and to communicate elsewhere on the web. The storage of Cookies on the consumer’s computer provides an easy and convenient way for Digiseq to personalise or enhance the consumer experience and to make future visits more enjoyable.

### 9.2 IP Addresses

Digiseq may keep track of Internet Protocol (IP) addresses to (among other things):

1. troubleshoot technical concerns,
2. maintain website safety and security,
3. restrict access to Digiseq websites to certain users, and,
4. better understand how Digiseq’s websites are used

### 9.3 Log files

Digiseq may collect information in the form of log files that record website activity and gather statistics about web users' browsing habits. These entries are generated anonymously, and help Digiseq gather (among other things)

1. a user’s browser type and operating system,
2. information about a user’s session (such as the URL from which they came, the date and time they visited the Digiseq website, and which pages have been viewed and for how long), and,
3. other similar navigational or click-stream data. Digiseq also uses information captured in log files for internal marketing and demographic studies, so that Digiseq can constantly improve and customise the online services that are provided. Log files are used internally only, and are not associated with any particular user.



## 9.4 Web beacons

Digiseq may use web beacons (or clear GIFs) on websites or include them in the e-mail messages that are sent to the consumer. The information collected via web beacons may include some of the information described in the IP Address section directly above, as well as information about how a user responds to an email campaign (e.g., the time the email is opened, where does the user link to from the email, etc.). Digiseq uses web beacon information for a variety of purposes, including but not limited to, site traffic reporting, unique visitor counts, advertising and email auditing and reporting, and personalisation.



## **10E marketing and spamming**

Digiseq does NOT send spam e-mails. Sending e-mails without consent is illegal in many countries. Digiseq will not use personal information (including an e-mail address) for direct marketing or follow-up communications unless the consumer gives us your EXPRESS permission. This is called "OPT-IN" consent.

Also, Digiseq does not share personal information with any third party who will use personal information for spam mails.



## **11 Retention of personal information**

Digiseq may store the personal information that a consumer has provided with through the various methods described in this Privacy Notice in Digiseq's databases such as the Digiseq Customer Relationship Marketing database. Digiseq will only keep personal information for as long as it is reasonably necessary taking into consideration Digiseq's need to answer queries or resolve problems, provide improved and new services and comply with legal requirements under applicable law(s). This means that Digiseq may retain personal information for a reasonable period after the consumer stops using Digiseq services or stops using this website or application. After this period, personal information will be deleted from all systems in Digiseq.



## **12** Links to third party sites

Digiseq websites and applications may provide links to, or features from, other third party sites (such as independent e-commerce sites). If the consumer links to or uses such third party sites or features, they do so at their own risk. Digiseq does not control and is not responsible for the content or practices of any third party site, application, or feature.



## 13 Customer privacy notice

The foregoing sections describe the Privacy Policy from Digiseq’s point of view; the following text, which describes Digiseq’s policy from a Customer point of view, is designed to be used publicly.

Some of Digiseq’s devices are designed with payment technology, which allows you to add your debit or credit cards to your device and to make payments with it. When you do so, you authorise us to share certain information, including personally identifiable information (‘PII’) with your bank and your credit or debit card network. This information may include information about your Digiseq account, Digiseq App, and your payment account information (including but not limited to your name, credit or debit card number, expiration date, billing address and card security code, as well as any other information you provide when adding payment methods to your account or as otherwise may be used to facilitate payments).

This information may be used to:

- facilitate, support and improve the functionality and security of Digiseq’s services
- to verify accurately the identity of Digiseq service users and authenticate correctly payment accounts, including by testing and improving identity verification and account authentication by Digiseq, your bank and your credit or debit card network
- protect and prevent actual or potential fraud, unauthorised transactions, or legal claims
- create aggregated, de-identified data and reports that do not identify you
- provide customer service.

Also, adding a payment method to your account, as well as some of Digiseq’s payment features, may require the use of your location data. If location services are enabled on your account, you authorise us to share your location data with your bank and your credit or debit card network.

Your information is also subject to your bank’s and your network’s privacy policies, which you may have accepted previously or may be asked to accept when adding a payment method to your account.

## 14 References

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