

Privacy Policy



Please note this Privacy Notice does not apply if another company (typically your employer) has paid for your access to the Mintec App or otherwise issued you with authentication credentials to the Mintec App. In such a case, we act as a data processor on behalf the data controller company in accordance with the terms of the agreement we have entered with the company.

Instead, this privacy notice only applies if you have obtained access to the Mintec Analytics mobile application software (“**App**”) in a direct or personal capacity. It applies to your use of the App on your mobile telephone or handheld device (“**Device**”) and sets out the basis on which any personal data collected from you, or that you provide via the App, will be processed.

This App is not intended for children and we do not knowingly collect data relating to children. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

Important information and who we are

Mintec Limited is the controller and is responsible for your personal data (collectively referred to as “Mintec”, “we”, “us” or “our” in this policy).

If you have any questions about this privacy policy, please contact us using the details set out below:

- Full name of legal entity: Mintec Limited
- Email address: info@mintecglobal.com
- Postal address: Gloucester House, Unit Q, Bourne End Business Park, Coles End Road, Bourne End, Bucks, England, SL8 5AS

Changes to the privacy policy and your duty to inform us of changes

We keep this privacy policy under regular review.

This version was last updated on 21/02/2019. It may change and if it does, these changes will be posted on this page and, where appropriate, notified to you when you next start the App. The new policy may be displayed on-screen and you may be required to read and accept the changes to continue your use of the App or the Services.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during our relationship with you.

Third party terms

Our App may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. Please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services. Please check these policies before you submit any personal data to these websites or use these services.

Your use of the App may also be subject to the terms and privacy notice of the App Store from which you obtained it.

The data we collect about you

We may collect, use, store and transfer different kinds of personal data about you as follows:

- **Identity Data:** first name, last name, company, account identifier.
- **Device Data:** includes the type of mobile device you use, a unique device identifier (for example,

your Device's IMEI number, Internet Protocol address, or the MAC address of the Device's wireless network interface), mobile network information, and your mobile operating system.

- **Profile Data:** includes your username and password, your preferences and feedback.
- **Usage Data:** includes details of your use of our App including, but not limited to, time of use, duration of use, traffic data and the resources that you access.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific App feature. 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.

How is your personal data collected?

We will collect and process the following data about you:

- **Information you give us.** This is information (including Identity and Profile) you consent to giving us about you by filling in forms on the App or by corresponding with us (for example, by email or chat). It includes information you provide when you download or register an App, subscribe to any of our Services, search for an App or Service, and when you report a problem about the App or our Services. If you contact us, we will keep a record of that correspondence.
- **Information we collect about you and your device.** Each time you use our Apps we will automatically collect personal data including Device and Usage Data.
- **Information we receive from other sources including third parties and publicly available sources.** We will receive personal data about you from various third parties including Device Data from Google Play Store or the App Store.
- **Unique application numbers.** When you want to install or uninstall an App containing a unique application number or when such an App searches for automatic updates, that number and information about your installation, for example, the type of operating system, may be sent to us.

Cookies

This App does not use these "cookies" explicitly. However, the App may use third party code and libraries that use "cookies" to collect information and improve their services. You have the option to either accept or refuse these cookies and know when a cookie is being sent to your device. If you choose to refuse our cookies, you may not be able to use some portions of this App.

How we use your personal data

We will only use your personal data when the law allows us to do so. Most commonly we will use your personal data in the following circumstances:

- Where you have consented before the processing.
- Where we need to perform a contract we are about to enter or have entered with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

We will only send you direct marketing communications by email or text if we have your consent. You have the right to withdraw that consent at any time by contacting us. We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Disclosures of your personal data

We may disclose your personal information to third parties, including:

- Other Companies in the Mintec corporate group, which means our subsidiaries, our ultimate holding company and its parent and subsidiaries.
- Service providers who provide us with support and technical software solutions.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

International transfers

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Data security

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password that enables you to access the App, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Once we have received your information, we will use strict procedures and security features to try to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator when we are legally required to do so.

Data retention

Your data is retained for the duration of your use of the App, and for six months following deletion of the App.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Your legal rights

Under certain circumstances you have the following rights under data protection laws in relation to your personal data.

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the

accuracy of the new data you provide to us.

- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - (a) if you want us to establish the data's accuracy;
 - (b) where our use of the data is unlawful but you do not want us to erase it;
 - (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

You also have the right to ask us not to continue to process your personal data for marketing purposes.

You can exercise any of these rights at any time by contacting us.

You also have the right to make a complaint at any time to the Information Commissioner's Office ("ICO"), the UK supervisory authority for data protection issues or other competent supervisory authority of an EU member state if the App is downloaded outside the UK.