

SPARQA LIMITED

PRIVACY & COOKIES POLICY

Last updated: 5 October 2018

1. About this Privacy & Cookies Policy

- 1.1 This website, www.sparqa.com (the **Site**) is operated by Sparqa Limited, a company incorporated in England and Wales with company number 10199587. Our registered office is at Lower Ground Floor, 17-21 Emerald Street, London, England WC1N 3QN (**Sparqa, our, us** or **we**).
- 1.2 We are committed to protecting your privacy. We comply with the principles set out in the General Data Protection Regulation (2016/679) and other applicable national privacy legislation (**Data Protection Legislation**).
- 1.3 The aim of this privacy and cookies policy (**Policy**) is to tell you how we will use any personal information collected from and about users of this Site and those who communicate with us (**you, your**). Please read it carefully before you proceed.
- 1.4 We may modify this Policy from time to time. We will use reasonable endeavours to notify you of any material amendments to this Policy by placing a clear notice about them on this Site or by other means. Please review this Policy whenever you use this Site as any changes apply from the date that we make them.
- 1.5 As our customer or as a visitor to the Site, we and the companies that work on our behalf collect information about you. This includes your personal information and information on your use of the Site as set out in this Policy at paragraph 2.1. If you would like further information about this Policy you can contact us on the details provided in paragraph 9.
- 1.6 In this Policy, **associated organisation** means the business or organisation with which you are associated.

2. What information do we collect?

- 2.1 We collect, store and use the following personal information about you:
 - 2.1.1 information that you provide to us when registering with this Site or in relation to subscriptions for our products and services (including your name, email address, other contact details, password and, if payment is required, card details);
 - 2.1.2 information that you provide to us for the purpose of subscribing to our notifications, newsletters or bulletins;
 - 2.1.3 information about you that your associated organisation provides to us (including the details of persons who are authorised users of this Site and our products and services);
 - 2.1.4 information contained in or relating to any communications that you send to us through this Site or by other means (including the content and metadata associated with the communication);

- 2.1.5 information in relation to content, materials, text, publications, articles, documents, know-how or files you supply to us or upload to the Site, or save to our system via functionality provided on the Site;
- 2.1.6 information you provide on interactive areas on the Site (for example, comment facilities, forums, 'like' functionality and bulletin boards);
- 2.1.7 information collected about your device and your use of this Site (including your IP address or other device ID, browser type and version, operating system, referral source, length of visit, page views and Site navigation paths);
- 2.1.8 information generated in the course of the use of our products and services (including the timing, frequency and pattern of service use);
- 2.1.9 information collected through cookies and similar technologies (see section 5 (*Use of Cookies on this Site*) below); and
- 2.1.10 any other personal information that you choose to send to us.

Where the information you provide relates to someone else, you must tell them how we will use their information in accordance with this Policy.

3. How will we use your personal information?

- 3.1 We will use your personal information for the following purposes:
 - 3.1.1 to provide you with the services on this Site, perform our contract with you and fulfil your requests, such as facilitating transactions and administering your account;
 - 3.1.2 to administer and improve this Site and our products and services;
 - 3.1.3 if you consent, to contact you with information, newsletters, bulletins and marketing materials about our products and services, including by email, telephone and post;
 - 3.1.4 for internal research and development purposes and to improve and test the features and functions of our products and services;
 - 3.1.5 to report to your associated organisation about its users and their usage of the Site and the subscribed products and services;
 - 3.1.6 to conduct and store site usage analytics, statistical and trend analysis and market research;
 - 3.1.7 to provide content rankings and other trend information (for example, 'most viewed' and 'popular' content) through the Site;
 - 3.1.8 to produce automated search and content rankings, including those personalised for the user;
 - 3.1.9 to assign or sub-contract, procure goods or services for, or outsource any part of, our normal business functions to third parties;

- 3.1.10 to investigate and respond to any queries or complaints about this Site, us or our business;
 - 3.1.11 to personalise your experience of the Site, for example, by suggesting relevant articles or individuals you may wish to follow;
 - 3.1.12 where relevant, to establish, exercise or defend legal claims;
 - 3.1.13 to protect the rights, property, or safety of us, our business, our clients or others;
 - 3.1.14 to detect, investigate or prevent security or cyber incidents;
 - 3.1.15 to monitor and analyse the use of any account to prevent, investigate and/or report fraud, misrepresentation, security incidents or crime; and
 - 3.1.16 to meet applicable legal, regulatory and compliance requirements.
- 3.2 We will also use information collected through cookies and similar technologies as set out in paragraph 5 below.

4. Sharing your personal information

- 4.1 When we share your personal information, we do so in accordance with Data Protection Legislation.
- 4.2 We share personal information with our 100% parent company, Silcrow Labs Limited, a company registered in England and Wales with company number 10596143 whose registered office is a Lower Ground Floor, 17-21 Emerald Street, London WC1N 3QN.
- 4.3 We employ the services of third parties to help us in certain areas, such as software development, data hosting, user analytics, email services, payment processing, advertising, and user notification and feedback functionality. We will share your personal data with one or more of these third parties for the purpose of making the Site and our services available to you.
- 4.4 We will share your personal information with government authorities and other third parties when compelled to do so by government and law enforcement authorities or as otherwise required or permitted by law, including but not limited to in response to court orders. We may also disclose personal information when we have reason to believe that someone is causing injury to or interference with our rights or property, other users or anyone else that could be harmed by such activities. We also cooperate with law enforcement inquiries and other third parties to enforce laws, intellectual property rights and other rights.
- 4.5 In the event that our business is sold or integrated with another business, your personal information may be disclosed to our advisers, a prospective purchaser and any prospective purchaser's advisers and will be passed to the new owners of the business.

5. Use of cookies and similar technologies

- 5.1 We and our third party service providers use cookies and similar technologies to collect information about, and relevant to, your usage of the Site. Cookies are small pieces of

information sent by a web server to a web browser which allow the server to uniquely identify the browser on each page.

5.2 We use (or will use in future) the following categories of cookies (or other technologies having similar function and effect) on this Site from time to time:

5.2.1 **Strictly necessary cookies:** These cookies are essential to enable you to move around the Site and use its features. Without these cookies, services you have asked for (such as remembering your login details) cannot be provided.

5.2.2 **Performance cookies:** These cookies collect information about how visitors use the Site, for instance which pages visitors go to most often, and if they get error messages from web pages. Information these cookies collect will be used to improve how the Site works (or, otherwise, to provide information about a user's interaction with the Site).

5.2.3 **Functionality cookies:** These cookies allow the Site to remember choices you make (such as your user name) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to aspects of the Site that you can customise. These cookies cannot track your browsing activity on other Sites.

5.2.4 **Security cookies:** These cookies form part of our security features, for example, by helping us detect malicious activity and violations of our Terms and Conditions and agreements with subscribers for our products and services.

5.2.5 **Social media cookies:** These cookies allow you to share your activity on the Site on social media such as Facebook and Twitter. These cookies are not within our control. Please refer to the privacy policies of the social networks in question for information regarding how their cookies work.

5.3 When you visit the Site for the first time (and periodically after that), we will request your consent to the setting of all cookies other than strictly necessary cookies.

5.4 If you want to delete any cookies that are already on your computer, please refer to the help and support area on the toolbar of your internet browser. Most browsers will tell you how to stop accepting cookies and disable existing cookies.

5.5 Please note that by deleting our cookies or disabling future cookies you may not be able to access this Site or certain areas or features.

5.6 To find out more about cookies please visit www.allaboutcookies.org.

6. **Third party links**

This Site contains links to other Sites over which we have no control. We are not responsible for and do not review or endorse the privacy policies or practices of other Sites which you choose to access from this Site. We encourage you to review the privacy policies of those other Sites so you can understand how they collect, use and share your personal information.

7. Security

We have implemented appropriate technical and organisational measures designed to secure your personal information from accidental loss and from unauthorised access, use, alteration and disclosure. However, the internet is an open system and we cannot guarantee that unauthorised third parties will never be able to defeat those measures or use your personal information for improper purposes.

8. Updating your information

8.1 You may review, correct, update or change your personal information at any time by contacting us as set out in paragraph 9 below.

8.2 You can unsubscribe from marketing communications by using the unsubscribe link in those communications or, otherwise, by using any functionality provided through the Site.

9. How to contact us

If you have any questions about this Policy or your personal information, please contact us at info@sparqa.com or on +44 (0)20 3912 0619.

10. Additional information for the EEA

In order to meet applicable data protection and privacy law in the European Economic Area (EEA), we provide certain additional information below.

11. Who is responsible for your personal data?

Sparqa will be the data controller for the personal information collected through, and in relation to, our Site and services. Our contact details are set out at paragraph 9 above.

12. Lawful basis for processing

12.1 We have documented the lawful bases for our processing in Annex 2.

12.2 On some occasions, we process your personal information on the basis of your consent (for example, when you agree that we may set cookies other than those that are strictly necessary). Where we do process data based on consent, your consent is revocable at any time.

12.3 On other occasions, we process your data when we are required to do this by law (for example, if we are required by court order or any applicable law to process data).

12.4 When we ask you to supply us with personal information we will make it clear whether the information we are asking for: (i) must be supplied so that we can provide services to you under the Terms and Conditions you enter into with us or because it is required by law; or (ii) is optional, and the consequences of not providing the information.

12.5 The processing of some of your personal information (eg, your login details and information provided in order to purchase products or services from us) is necessary in order to provide services on the Site to you pursuant to the Terms and Conditions you enter in to with us or pursuant to other contracts you have with us. Without this information, we would not be able to provide certain services to you.

12.6 We also process your personal information when it is in our, or a third party's, legitimate interests to do so, provided that your data protection rights do not override these interests. Where we are not relying on consent, legal requirements or contractual necessity, we process your personal information for the legitimate interests as described in this Policy.

12.7 Annex 1 summarises the lawful bases pursuant to which we may process your personal data in accordance with applicable Data Protection Legislation. For each type of processing described in paragraph 3 of this Privacy Policy, Annex 2 identifies the relevant lawful basis or bases for such processing.

13. International data transfers

We will transfer your personal information to our service providers as identified above in paragraph 4.3, which will in some cases involve the transfer of personal information to countries outside the EEA which have different data protection standards to those which apply in the EEA, for the purposes set out in this Policy. We will put in place European Commission approved standard contractual clauses to protect this data or will rely upon another appropriate safeguard, such as a relevant Privacy Shield (eg, the EU-US Privacy Shield). You have a right to ask us for a copy of the safeguard (by contacting us as set out in paragraph 9 above).

14. How long will we keep your personal information?

14.1 We will only keep your information for as long as is necessary for the purposes in paragraph 3.

14.2 Sparqa keeps your profile and account until you request that we close it or your account is otherwise terminated or expires in accordance with our Terms and Conditions. You can request closure of your account either by contacting us via the contact details in paragraph 9 or using any functionality provided on the Site for this purpose from time to time.

14.3 If you close your account, we will endeavour to remove your account from Sparqa's production system within 48 hours. We generally delete closed account information within 30 days of account closure, except as noted below and otherwise in our Terms and Conditions.

14.4 You will not be able to access your account or its contents after you close your account. However, your public profile may be displayed in search engine results until the search engines refresh their cache.

14.5 Following deactivation of your account, we will retain information about usage of the Site collected during the period your account was active, including your usage information, as well as information concerning your payments for our products and services.

15. Your rights

15.1 We respect your rights to access and control your information and will respond to requests in accordance with Data Protection Legislation. We may ask you to verify your identity and to provide other details to help us to respond to your request.

15.2 Depending on the lawful basis for processing upon which we rely, you have a right to:

15.2.1 request access to your personal information;

- 15.2.2 request that we correct or complete personal information that is inaccurate or incomplete;
 - 15.2.3 request that we erase your personal information, which we will do where required by Data Protection Legislation;
 - 15.2.4 restrict our processing of your personal information, in certain circumstances;
 - 15.2.5 request that we provide you with copies of your personal information in a machine-readable format or transfer it across different services;
 - 15.2.6 object to certain types of processing, including where we process your personal information on the basis of our legitimate interests and for direct marketing purposes; and
 - 15.2.7 where we have asked for your consent to process your data, to withdraw this consent.
- 15.3 If you wish to exercise these rights, please contact us using the contact details in paragraph 9 above. We hope that we can satisfy any queries you may have about the way we process your data. However, if you have unresolved concerns you also have the right to complain to data protection authorities.

Annex 1

Summary of the lawful bases for processing under Article 6 of the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016)

Lawful basis	Description
Consent	You have given consent to the processing of your personal data for one or more specific purposes.
Contract	Processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract.
Legal obligation	Processing is necessary for compliance with a legal obligation to which we are subject.
Vital interests	Processing is necessary in order to protect the vital interests of you or another natural person.
Public task	Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
Legitimate interests	Processing is necessary for the purposes of legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data.

Annex 2

Lawful bases for processing under this Privacy Policy

Para.	Type of and purpose of processing	Lawful basis for processing
3.1.1	Provide you with the services on this Site, perform our contract with you and fulfil your requests, such as facilitating transactions and administering your account.	<ul style="list-style-type: none"> • Contract • Legitimate interest in facilitating users' interaction with the Site.
3.1.2	Administer and improve this Site and our products and services.	<ul style="list-style-type: none"> • Legitimate interest in administering and improving the Site and our products and services for the benefit of users.
3.1.3	If you consent, contact you with information, newsletters, bulletins and marketing materials about our products and services, including by email, telephone and post.	<ul style="list-style-type: none"> • Consent
3.1.4	For internal research and development purposes and to improve and test the features and functions of our products and services.	<ul style="list-style-type: none"> • Legitimate interest in administering and improving the Site and our products and services for the benefit of users.
3.1.5	Report to your associated organisation about its users and their usage of the Site and the subscribed products and services.	<ul style="list-style-type: none"> • Legitimate interest in providing associated organisations with information about their users' usage of the Site.
3.1.6	Conduct and store site usage analytics, statistical and trend analysis and market research.	<ul style="list-style-type: none"> • Legitimate interest in continually improving the user experience of the Site and our products and services generally.
3.1.7	Provide content rankings and other trend information (for example, 'most viewed' and 'popular' content) through the Site.	<ul style="list-style-type: none"> • Legitimate interest in continually improving the user experience of the Site.
3.1.8	Produce automated search and content rankings, including those personalised for the user.	<ul style="list-style-type: none"> • Legitimate interest in continually improving the user experience of the Site.
3.1.9	Assign or sub-contract, procure goods or services for, or outsource any part of our normal business functions to third parties.	<ul style="list-style-type: none"> • Contract • Legitimate interest in running a commercial enterprise which employs the services of appropriate third party service providers.
3.1.10	Investigate and respond to any queries or complaints about this Site, us or our business.	<ul style="list-style-type: none"> • Legitimate interest in being responsive to user queries and complaints about the Site.
3.1.11	Personalise your experience of the Site, for example, by suggesting relevant articles or individuals you may wish to follow.	<ul style="list-style-type: none"> • Legitimate interest in enhancing the experience of users of the Site through personalisation.
3.1.12	Where relevant, to establish, exercise or defend legal claims.	<ul style="list-style-type: none"> • Legal obligation • Legitimate interest in the protection of personal rights, property and safety.

3.1.13	Protect the rights, property, or safety of us, our business, our clients or others.	<ul style="list-style-type: none"> • Legal obligation • Legitimate interest in the protection of personal rights, property and safety.
3.1.14	Detect, investigate or prevent security or cyber incidents.	<ul style="list-style-type: none"> • Contract • Legal obligation • Legitimate interest in detecting, investigating or preventing security or cyber incidents.
3.1.15	Monitor and analyse the use of any account to prevent, investigate and/or report fraud, misrepresentation, security incidents or crime.	<ul style="list-style-type: none"> • Contract • Legitimate interest in preventing and investigating fraud, misrepresentation, security incidents and crime to protect (a) users of the Site, and (b) our directors, employees and consultants.
3.1.16	Meet applicable legal, regulatory and compliance requirements.	<ul style="list-style-type: none"> • Legal obligation • Legitimate interest in ensuring compliance with applicable UK and overseas laws and regulations.
3.2	Processing by way of cookies and similar technologies (see paragraph 5)	<ul style="list-style-type: none"> • Consent

Note: where more than one lawful basis for processing is identified above, depending on the circumstances (a) all such lawful bases may apply, or (b) one or more (but not all) of the lawful bases may apply.