

YOTTA - PRIVACY AND COOKIES POLICY

This is the privacy policy for Yotta which governs how we treat the personal information you provide to us by interacting with our sales and support staff in person or by telephone (**Personal Interaction**), by visiting and registering with our website www.yotta.co.uk (**the Site**), or by using our Applications (**the Apps**).

This privacy policy explains what, how and why your personal data may be collected and used. The Site and the Apps are both operated by Yotta Limited (**Yotta, we, us and our**) (registered number 01987036), our trading address is Gem House, 8 Hamilton Terrace, Leamington Spa, Warwickshire, CV32 4LY and our registered office address is Unit 6 Oxford Industrial Park, Yarnton, Oxfordshire, OX5 1QU.

Yotta is committed to protecting your privacy. At Yotta, we appreciate that you do not want the personal information we hold about you distributed indiscriminately and here we explain how we collect information, what we do with it and what controls you have.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out at the end of this policy.

WHAT DATA DO WE COLLECT?

Personal Interaction	Data collected from the Site	Data collected from the Apps
<p>Contact and identity data including information (such as your name, email address, postal address and telephone number) you provide to our representatives via telephone, email, or personally at trade shows or other marketing events in connection with marketing, promotion or sale of Yotta products.</p>	<p>Contact and identity data including information (such as your name, email address, postal address and telephone number) you provide by completing forms on the Site, including if you register as a user of the Site, upload or submit any material via the Site, or request any information.</p>	<p>Contact and identity data including:</p> <ul style="list-style-type: none"> your name, username, email address, date of birth, gender, and/or account password; the phone number assigned to your mobile device, along with other pertinent information concerning your device, including the name of your wireless carrier/provider and any device identifier; any other personally identifiable information you share through the services.
<p>Communications data including communications you send to Yotta, for example to provide feedback to a Yotta representative.</p>	<p>Communications data including communications you send via our Site, for example to report a support problem or to submit queries, concerns or comments about the Site.</p>	<p>Social media data applicable where you have the ability to enable or log in to the Apps through via various social media or social networking services such as Facebook or Twitter (“Social Networking Services”). If you connect your social media account to our services, we collect certain personal information that you have provided to that Social Networking</p>

Survey data including information from surveys that Yotta may, from time to time, run for research purposes, if you choose to respond to them.

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Service.

Location data where the Apps may use location-based components. To provide these features, we or our partners and licensees may collect, use, and share precise location information, including the real-time geographic location of your product. This information may be collected from your wireless carrier, certain third party service providers, or directly from the mobile device with which you use or access our Apps. Your location information, however, is only displayed and shared in accordance with your established privacy settings.

We may combine the contact and identity data and location data with information from other services, apps or third parties in order to enhance your experience or to improve the overall quality of the Apps and the services.

Usage data including details of your visits to the Site, the resources you access and any data you download.

Usage data including certain non-personally identifiable information about your use of the Apps. Such information, which may be collected passively using various technologies, cannot be used to specifically identify you. We may store such information ourselves, or it may be included in databases owned and maintained by our respective affiliates, agents, and service providers.

Job application data including employment details if you send us a CV, resumé or other details of your employment history in connection with an advertised job vacancy or a general enquiry regarding employment opportunities with Yotta.

Cookies including certain information obtained from our Apps' cookies described in our cookies policy below.

Cookies including certain information obtained from our Site cookies described in our cookies policy below.

IF YOU DO NOT PROVIDE PERSONAL DATA

You are under no obligation to provide such personal data. However, if you should choose to withhold requested information, we may not be able to provide you with certain services.

HOW IS YOUR DATA USED?

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

- Where we need to perform the contract we are about to enter into or have entered into with you, for example the provision of our Apps.
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

What are our legitimate interests?

Yotta will process the personal information you provide for its legitimate business purposes, and we have set out below in table format a description of the legitimate interest we are relying on to process each category of data we are collecting from you.

Personal Interactions Data	
Legitimate Interest	Type of Data
Enable us to provide you with the services and information you request from Yotta and our sales team.	Contact and identity data. Usage data. Cookies.
Send you information we think you may find useful by email and by post, including information about our products and services, unless you have indicated that you object to being contacted for these purposes.	Contact and identity data. Communications data.
Carry out research, to determine the effectiveness of our advertising and promotional campaigns.	Survey data. Communications data.

Site Data	
Legitimate Interest	Type of Data
Enable us to provide you with the services and information you wish to utilise through our Site.	Contact and identity data. Usage data. Cookies.

Send you information we think you may find useful by email and by post, including information about our products and services, unless you have indicated that you object to being contacted for these purposes.	Contact and identity data. Communications data.
Carry out research, to determine the effectiveness of our advertising and promotional campaigns.	Survey data. Communications data.
Enable Yotta job candidates to submit their applications through the Site.	Job application data. Contact data.
Identify visitors to the Site, pages visited, and duration of visits.	Usage data. Cookies.
Audit the downloading of data from the Site, to better understand how people interact with the Site.	Usage data. Cookies.
Improve the layout and/or content of our web pages and customise them for users.	Usage data.

Apps Data

Legitimate interest

Type of Data

Operating, maintaining, and providing you all of the features of the Apps, including the display of customized content and advertising.	Contact and identity data.
Providing the basic functionality of the Apps, such as displaying your location and movement.	Contact and identity data. Location data.
Contacting you to deliver special offers, promotions, or other information.	Contact and identity data.
Auditing, research, and analysis in order to maintain, protect, and enhance the Apps.	Usage data.
Installing and monitoring elements for security and fraud prevention purposes.	Usage data.
Providing you with information and notices related to the Apps.	Contact and identity data.
Inviting you to participate in surveys conducted by us and/or our affiliates.	Contact and identity data.
Improving our marketing and promotional efforts.	Contact and identity data.

If you object to us processing your data for the purposes mentioned above, you can exercise your rights to stop us doing so by contacting us using the link at the end of this privacy policy. Please bear in mind that if you do object this may affect our ability to carry on providing service to you.

If we intend to use your personal information in a manner different than the purpose for which it was collected, we will ask you for your consent prior to such use, or give you an effective way to opt out.

DIRECT MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Individuals will receive marketing communications from us if you have requested information from us or purchased goods or services from us, agreed to receive marketing material through our Apps, or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Opting out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Managing your App privacy settings

We recommend that you actively manage your App privacy settings on an ongoing basis, so that you can effectively guard against the unauthorised use or misuse of your personal information or location information by others.

WITH WHOM IS THE INFORMATION SHARED?

Aggregated data. We may disclose aggregate statistics about our customers, visitors to the Site, and users of the Apps (location, device used, pages visited), in order to describe our services to prospective partners, advertisers and other reputable third parties and for other lawful purposes, but these statistics will include no personally identifying information. We use Google Analytics to track and measure traffic on the Site, to better understand customer behaviour, and improve customer experience.

Consent. We may share your personal information or location information where you have consented to the disclosure. Other than as described in this privacy policy, you will receive notice when information about you might go to third parties, and you will have an opportunity to choose not to share the information.

Affiliates. Yotta may disclose personal information to any of its affiliates, or to its agents or contractors who assist us in providing the services we offer through the Site, or our Apps by processing and fulfilling requests for information, providing support services, receiving and sending communications and analysing data, or in other tasks, from time to time.

Re-organisation. In the event that Yotta undergoes reorganisation or is sold to a third party, any personal information Yotta holds about you may be transferred to that reorganised entity or third party. However none of your personal information will be transferred to a third party prior to a sale or reorganisation completing.

Legal requirement. Yotta may disclose personal information to the appropriate authorities, if required to do so by law or if it believes that such action is necessary to prevent fraud or cyber-crime or to protect and defend the rights, property or personal safety of Yotta, any of its affiliates, the Site or its visitors.

WHERE IS YOUR INFORMATION STORED?

The Site. Generally, information which you submit via the Site is sent to and stored in an

encrypted form on a single server located in the United Kingdom. This is necessary in order to process your information.

The Apps. Information which you submit via our Apps are stored on Amazon Web Services cloud computing servers which are only located in the European Economic Area.

Information submitted by you may be transferred by us to our other offices and/or to third parties in the circumstances mentioned in this privacy policy, which may be situated outside the European Economic Area. In those circumstances we will not transfer your personal data unless we are satisfied that adequate mechanisms are in place to comply with data protection and privacy laws.

HOW LONG WILL PERSONAL DATA BE KEPT?

Personal data (identified above in this policy) of customers will be kept until a customer advises us they no longer wish to use our products or services, terminates any business relationship with us or requests that their information be deleted.

With respect to personal data of non-customers, we will hold this information until they request that their information is deleted, or they have been consistently unresponsive to our communications. We will perform a periodic audit of the non-customer information held and assess whether our communications to such contacts is consistently yielding no responses, and should be deleted.

EXTERNAL LINKS

The Site may, from time to time, contain links to external sites. Yotta is not responsible for the privacy policies or the content of such sites.

SECURITY

Yotta places great importance on the security of all personally identifiable information associated with our users. We have security measures in place to attempt to protect against the loss, misuse and alteration of personal information under our control. For example, our security and privacy policies are periodically reviewed and enhanced as necessary and only authorised personnel have access to user information. While we cannot ensure or guarantee that loss, misuse or alteration of information will not occur, we use all reasonable efforts to prevent this.

You should bear in mind that transmission of information over the internet is never entirely secure. We cannot guarantee the security of information you transmit to the Site or our Apps and any such transmission is at your own risk.

It is advisable to close your browser when you have finished your user session, and lock your mobile device when not used, to help ensure others do not access your personal information.

USE OF COOKIES

Cookies are pieces of information that a website transfers to your hard drive to store and sometimes track information about you. Most web browsers automatically accept cookies, but if you prefer, you can change your browser to prevent that. However, you may not be able to take full advantage of a website if you do so. Our cookies are specific to the server that created them and cannot be accessed by other servers, which means they cannot be used to track your movements around the web. Although they do identify a user's computer, cookies do not personally identify users or passwords and do not store credit or debit card details.

We use cookies to:

- identify who you are and to access your account information;
- estimate our audience size and patterns;
- ensure that you are not asked to register twice;
- track preferences and to improve and update the Site
- enable us to use the features available on Google Analytics mentioned earlier in this policy.

YOUR RIGHTS

If you have registered on our Site or created an account via in-app registration, you may view, update, correct or delete certain of your personal information, and we are happy to assist with this. Under data protection law you also have the following rights.

- **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 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.

You also have a right to report any breaches of your data protection rights to the Information Commissioners Office (website here: <https://ico.org.uk/>). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Please email any questions, concerns or comments you have about this privacy policy or any requests concerning your personal data to our data privacy manager at support@yotta.co.uk.