

SOLUTION 7 LIMITED WEBSITE PRIVACY STATEMENT

1. ABOUT US AND WHAT WE DO

We are Solution 7 Limited (**S7, we, us, our**), a company registered in England and Wales with registration number 03415375. Our registered office is at The Magdalen Centre, Oxford Science, Park, Oxford, Oxon, OX4 4GA. We are registered with the UK Information Commissioner's Office under number Z9454666.

We license software to customers throughout the world. Our licensees download copies of our software for use on their servers. We do not host our licensees' data or, in the normal course of business, process (as defined below) any personal data for, or on behalf of, our licensees. Some licensees may allow us access to the personal data, which they hold, so that we can provide support or other services. Our licensees are the controllers of that personal data and we process it only on their instructions.

2. THIS PRIVACY STATEMENT

We respect your privacy and this privacy statement (**Privacy Statement**), together with our Website Terms of Use which can be found [here](#) and our Cookie Policy which can be found [here](#), governs how we collect, process and use your Personal Data (as defined below) for our own purposes (e.g. when you use this Website (www.solution7.co.uk) and to manage our relationship with prospects and licensees). For the purposes of applicable laws and regulations relating to data protection and privacy (**Data Protection Legislation**), S7 acts as a controller in respect of our use of your Personal Data for our own purposes. This Privacy Statement does not apply when we act as a licensee's processor.

This Statement may change from time to time and you should review it periodically. This Statement was last updated on 3 July 2024. You can request a pdf version of this privacy statement by sending an email to info@solution7.co.uk.

3. DEFINITIONS

Personal Data has the meaning given to it or any similar term (e.g., personal information) in applicable Data Protection Legislation and means any information which directly or indirectly identifies or otherwise relates to an individual, which is in the possession or under the control of S7.

process or **processing** means any operation that is carried out in respect of Personal Data, and includes collection storage, use, disclosure, transfer or deletion.

4. TYPES OF PERSONAL DATA AND HOW WE USE YOUR PERSONAL DATA

When you browse the Website, we may collect your Personal Data submitted as part of completing online forms and technical information collected by cookies (see our Cookie Policy [here](#) for further information) about the services that you use and how you use them. We may collect Personal Data that you provide when you contact S7, e.g., to express an interest in obtaining information about our services, ask questions or raise concerns about our services to us, use a "Contact Us" form or similar features, sign up for our emails or attend an event or download content. Such Personal Data may include contact information such as name, job title, company name, phone number, location and email address. If you are a representative for one of our service providers or a business partner, we may collect Personal Data from you and from third parties that includes contact details, information concerning business practices, creditworthiness, reputation and business history, and job titles or

roles. We may generate Personal Data about you when we interact with you or perform services for you. This may include information about your relationship with us or the services provided to you.

If you do not provide certain Personal Data to S7 when requested, we may not be able to provide certain services to you or provide you with access to all areas of the Website.

The Website is intended for use by those over 18. We do not knowingly collect Personal Data on the Website from anyone under the age of 18.

5. PURPOSES

We may collect and process your Personal Data:

- to provide you with marketing communications and inform you about news and information relating to S7 and our services, including work-stream updates and general business news;
- to assess your request for S7's services and to provide you with such services;
- to understand your needs and interests and to respond to your enquiries;
- to analyze and improve our services and for the management and administration of our business;
- to comply with applicable laws, rules and regulations, industry codes and internal policies and procedures;
- for the purpose of, or in connection with, any legal proceedings and to obtain legal advice or to establish, exercise or defend legal rights;
- the administration and maintenance of databases storing Personal Data;
- to comply with our contractual obligations;
- for ongoing review and improvement of the information, content and services provided on the Website and to prevent any disruptions or cyber-attacks;
- to analyse and report on the Website traffic, marketing and usage trends;
- to allow you to use and access the Website; and
- for purposes otherwise set out in this Privacy Statement.

6. HOW WE COLLECT YOUR PERSONAL DATA

We collect Personal Data:

- directly from you (e.g., through your use of the Website, when you send us an email, visit our premises, or contact or communicate with us e.g. at a conference or trade fair);
- from within S7 and from our affiliates;
- from a third party acting on your behalf such as, a lawyer;
- from publicly available sources;
- from your company or organisations when you or it register with us or download or install our software;
- using cookie technology.

7. OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

We rely on one or more of the following legal bases to use your Personal Data for these purposes:

- in order to perform our contractual obligations with you;
- we have obtained your consent;
- we have legal or regulatory obligations that must be discharged;
- to establish, exercise or defend our legal rights or for the purpose of legal proceedings; or
- the use of your Personal Data is necessary for our legitimate business interests including allowing us to effectively and efficiently administer and manage business operations, maintaining compliance with internal policies and procedures, for internal research purposes or managing use

of our copyrighted materials.

We may collect, use and share aggregated data such as statistical data for any purpose. Aggregated data may be derived from your Personal Data but is not your Personal Data because it does not identify you (directly or indirectly). If we combine or connect any aggregated data with Personal Data so that we can identify you, we will use the combined data in accordance with this Privacy Statement.

We do not use your Personal Data for the purposes of automated decision making, including profiling.

8. SHARING PERSONAL DATA

S7 may share or provide access to your Personal Data among its affiliates and business units and third party agents, service providers and contractors outside of S7:

- for the purpose of the management and administration of S7's business such as our insurer;
- for the purposes of making HR decisions;
- for the purposes of providing you with services;
- for the purpose of the administration and maintenance of the databases storing Personal Data;
- for the purposes of S7 receiving services such as accountants, service providers, professional advisors, consultants and legal advisors, HR support, event management vendors and caterers and IT and communications providers;
- to the extent required by law, or to establish, exercise or defend our legal rights;
- for the performance of employment or contractual duties or for emergency reasons;
- as part of a transaction, financing or for other business needs; or
- if S7 or any of its affiliates, divisions or business units is acquired by a third party, (including bankruptcy), in which case the Personal Data held by S7 about you will be accessible to, and may be acquired by, the third party buyer.

9. LINKS TO OTHER WEBSITES

The Websites may contain links to other party websites that are not governed by this Privacy Statement. Linked sites may have their own privacy statements or policies, which you should review. S7 is not responsible for the content of links or third party websites and your use of such third party websites is at your own risk.

10. INTERNATIONAL TRANSFERS OF PERSONAL DATA

Your Personal Data may be processed and disclosed as described in this Privacy Statement, in any jurisdiction in which we conduct business or have a service provider. Not all countries provide the same level of protection in relation to Personal Data as the UK. S7 will comply with applicable legal and regulatory obligations in relation to your Personal Data if and when we make such international transfers or access, including having a lawful basis for transferring your Personal Data and putting in place appropriate safeguards to ensure an adequate level of protection for your Personal Data.

11. SECURITY

S7 has implemented technical and organisational measures to protect Personal Data and to maintain the security of our information systems which store your Personal Data. Files containing Personal Data are protected with safeguards according to the sensitivity of the information. Appropriate controls

such as restricted access, are placed on our systems. Measures are taken to ensure physical access to Personal Data is limited to authorised employees.

As a condition of employment or contract, S7 employees, directors, officers, contractors and other temporary staff members and personnel are required to follow applicable laws and regulations, including in relation to Data Protection Laws. Unauthorised use or disclosure of Personal Data by a S7 employee, director, officer, contractor or other temporary staff member/personnel is prohibited and may result in disciplinary measures.

12. HOW LONG WE KEEP PERSONAL DATA

We delete your personal data in accordance with our data retention policy. The period for which S7 will hold your Personal Data varies and will be determined by requirements to retain the Personal Data for as long as is necessary to satisfy or meet the purposes for which it was obtained including applicable legal or regulatory requirements and minimum periods for which S7 must retain your Personal Data as set by laws or regulations. S7 will take reasonable steps to anonymise or destroy your Personal Data when we no longer have a legal basis to retain it.

13. PROCESSING OF PERSONAL DATA FOR MARKETING PURPOSES

To the extent permitted by applicable Data Protection Law, we may contact you by mail, e-mail, SMS/text or telephone to provide you with information on services that may be of interest to you. If you do not want to receive such communications from us, please contact us on the details set out in this Privacy Statement or by using the opt-out facilities provided within the relevant marketing material.

Your option not to receive marketing material shall not preclude us from corresponding with you, by email or otherwise, regarding your relationship with us, shall not preclude us from accessing your Personal Data for our internal business purposes and shall not preclude us from disclosing your Personal Data as described in this Privacy Statement for purposes other than sending you marketing materials.

14. YOUR RIGHTS

You have legal rights in relation to the Personal Data about you that S7 holds. These rights may include:

- the right to refuse to provide, and the right to object to the processing of, your Personal Data. Such refusal or objection may prevent us from providing services to you;
- the right to confirm whether we process your Personal Data and to obtain information regarding the processing of your Personal Data and access to the Personal Data about you that S7 holds;
- where consent was provided for processing activities, the right to withdraw consent. This will not affect the lawfulness of any collection or processing undertaken before your withdrawal and S7 may be entitled to continue to process your Personal Data if it has another legitimate reason or a consent exception for doing so. In some cases, withdrawing your consent may prevent us from providing services to you;
- the right to receive a copy of your Personal Data in a structured, commonly used and machine-readable format and/or request that S7 transmit that data to a third party where this is technically feasible;
- the right to request that S7 rectify or correct your Personal Data if it is inaccurate or incomplete;
- the right to request that S7 erase or delete your Personal Data. There may be circumstances where S7 is legally entitled to retain Personal Data regardless of any such request;

- the right to request that S7 restrict, anonymise or block its processing of your Personal Data. There may be circumstances where S7 is legally entitled to refuse that request; and
- the right to lodge a complaint with the data protection regulator if you think that any of your rights have been infringed by S7 and we have not been able to resolve your issue.

If you wish to enquire about the rights which are applicable to you, or exercise the rights applicable to you, you can contact S7 using the details listed in this Privacy Statement.

We try to respond to all requests within a month. It may take us longer if things are complicated or you have made a lot of requests, but we will let you know what is happening. Normally you do not have to pay anything but, we may charge a reasonable fee if your request is unfounded, repetitive or excessive, or we may refuse to comply with your request in those circumstances. We may need you to provide more information to check your identity before we can proceed to action your request.

15. QUESTIONS

If you have any questions or concerns about S7's collecting or processing of your Personal Data, or about this Privacy Statement, you can contact us on info@solution7.co.uk.

It is important that your Personal Data is accurate and up to date. Please let us know if your Personal Data changes.