



56-60 Nelson Street
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Privacy and Cookies Policy

Aim

This privacy and cookies policy tells what to expect when Kilberry Computing Ltd. trading as iAccess collects personal information. It applies to information we collect about:

Visitors to our website
Customers of our services
Individuals who contact us about our services
Individuals who contact us with a general enquiry

We are committed to protecting the privacy and security of the people who interact with us. As part of our operations, we have to collect and 'process' certain information about the individuals who use our site or contact us in any identifiable way. We appreciate that this data belongs to you, not us, and so we aim to avoid the collection of any data that is not necessary to successfully facilitate these services. We also avoid storing data unnecessarily and purge our systems to delete any personal data that is held beyond its useful life. We therefore fully appreciate and respect the importance of data privacy, and security on the Internet and any data handling systems we use.

This policy therefore explains:

- What information we collect when you're using our platform and systems;
- Why we collect that information;
- How we may then use that information;
- How we share that information with other parties;
- How long we keep your information, and how we protect it whilst we have it;
- What we won't do with your information;
- What choice and options you have to control your information.
- If you have any queries or questions please contact our team using the contact details provided at the bottom of this policy.

Throughout we aim to be as clear and open as we can with you on what information we collect, why we collect it and how we use it, so you are informed and able to make decisions to control your information in ways that you're comfortable with. Whilst we hold your information, we will keep it up to date and protect it as if it was our own sensitive information, using industry appropriate security safeguards. We continually take into account the latest industry standards and best practice.

How do we collect information about you?



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In any interaction you may have with iAccess we collect information in three possible ways:

- When you directly give it to us (“Directly Provided Data”).
- When you log into our system and you give us permission to use that data (“User Authorised Data”).
- When you contact our customer service team to check any aspect of our service.

What information do we collect about you and why?

- We need to collect information about you, the products and services you are interested in so that we can improve the performance of services. To achieve that we may collect:
- Personal data about you including name and address, contact details such as telephone number and email address.

How do we Share and Store the data we collect?

We may share that information with companies within our supply chain (processors) and other businesses that are part of our service offer. When we share any information with these organisations we do so under strict contractual terms that include equivalent privacy policies, processing agreements and information security to protect your information.

We store your data on servers within the UK or European Economic Area (EEA). If operating outside of the EU we always ensure that we comply with the local, national or regional rules regarding data.

How long do we keep your data for?

We keep your information only for as long as it takes to process our services and for a period shortly afterwards, usually to answer or respond to any queries related to our services, following which the data is deleted or anonymised. During that period we may contact you to request that you assess the standard of our service.

Cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

We only use cookies when you visit our site to track site usage. These cookies allow us to measure and analyse how users navigate the website, to improve both its functionality and your experience.

By using our site, you agree to us placing these sorts of cookies on your device and accessing them when you visit the site in the future. If you want to delete any cookies that are already on your computer, the “help” section in your browser should provide instructions on how to locate the file or directory that stores cookies.

We use the following types of cookies:

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- Essential cookies. These are cookies that are required for the operation of our website.
- Analytical cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily. We usually aggregate the data for review but in some cases, we may collect information on content you have viewed in order to understand what interests you most.
- Marketing cookies. These cookies are used to show advertising that is likely to be of interest to you based on your browsing habits. These cookies, as served by our content and/or advertising providers, may combine information they collected from our website with other information they have independently collected relating to your web browser's activities across their network of websites

By using your browser controls, you are always in control of the cookies we store and access on your computer. More information on how to control cookies and limit personal data processing can be found at www.youronlinechoices.com/uk/five-top-tips. For comprehensive information on how to change your cookie settings in a wide variety of different web browsers, visit www.aboutcookies.org.

Users can also control the use of cookies at the individual browser level. We partner with third parties to display advertising on our website or to manage and serve our advertising on other sites. Our third party partners may use cookies or similar tracking technologies in order to provide you advertising or other content based upon your browsing activities and interests. If you wish to opt out of interest-based advertising click <http://www.youronlinechoices.eu/>.

How do we share the information we collect?

We are conscious that you are trusting iAccess with your information but in addition, to be able to carry out an efficient logistics service, we do need to work with a number of third parties (supply chain) who are experts in their particular fields. We are very careful who we share your information with, but it is important that you understand when that sharing takes place and why, and that's what this section explains. The limited instances where we may share your information include:

We share your information externally with our core service providers when required for our business to function and provide you with our service. In addition, we may request your specific opt-in to enable us to share your data with the wider group of companies.

Each of the external companies we work with has been carefully selected due to their ability to provide an efficient high-quality service including their ability to handle sensitive data (such as your personal information) securely and appropriately. Each of these external companies has a contract with us which clearly sets out our expectations and requirements in handling any of your information, and holds them fully responsible for meeting those expectations and requirements.



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On that basis and only on that basis, we may therefore disclose your personal information (including your personally identifiable information) to such third parties who need to be given specific tailored access to your information to facilitate a successful return of services by performing key tasks on our behalf, and who are obligated to only use it in line with our instructions, and not to disclose or use it for other purposes. We are confident that we can trust those third-party service providers with your information.

We also share your information when we're required to comply with any legal request as we are required to liaise with a number of regulators and other law enforcement agencies in any of the countries that we operate in. In some cases, we are also required to share information with Customs authorities. We may be required to share information for legal reasons for example to provide information for a 'Subject Access Request' to ourselves or our partners where we hold a processing responsibility.

Email Marketing

If we use your data for marketing purposes or share it with any other organisations for marketing, market research or commercial purposes, we will first ensure that we have your consent to do so. We will require explicit consent from you to carry out any marketing activities. You can unsubscribe from marketing activity at any time by contacting.

Your Rights

You can find out what information we hold about you by logging in to the platform where you will be able to access your 'profile' (the information we hold about you) and any recent transactions or uses of our services. You can also contact us directly using the details at the end of this policy to exercise your rights; this includes the removal of your data. Please note that we only hold information for the period of time that is necessary. Any data beyond that period will have been deleted or anonymised in line with our data Retention Policy.

Protecting your security

We are always striving to securely protect the data in our care and we aim to operate at least at industry standard. Consequently, your data is held on secure servers in the UK or in the cloud located in the EEA.

Secure data is not sent externally by email and internal systems are hosted securely.

Where some returns are paid for, our payment gateway operates independently of our systems and is PCI compliant to ensure that payment data is not held on our main platform or systems and only exists in an extremely secure 'banking' environment.

Links to other websites

Our Service may contain links to other sites. If you click on a third-party link, you will be directed to that site. Note that these external sites are not operated by us. Therefore, we strongly advise you to review the Privacy Policy of these websites. We have no control over, and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

Changes to this Policy

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We may change this Privacy and Cookies Policy from time to time. If we make significant changes in the way we treat your personal information, or to the Privacy Policy, we will make that clear on this website.

Queries or Questions

If you have any questions or comments, or if you want to update, delete or change any Personal Information we hold, or you have a concern about the way in which we have handled any privacy matter, please contact our Data Protection Officer (DPO) through the following ways:

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