



INTERCEPT IT LIMITED

PRIVACY POLICY

INFORMATION ABOUT US

We are Intercept IT Limited (“Intercept”, “we”, “us”, or “our”) a company registered in England and Wales under company number 4442332. We have our registered office at The Baltic Exchange, 38 St Mary’s Axe, London EC3A 8BH. Our VAT Number is (GB) 795 7477 56

YOU

Where we use the expressions “you/your/yours” we mean you, our customer, that is to say a subscriber to the services that we provide. Our services are for business customers only so you will not be an individual consumer but subscribing to our services for the purposes of a business, which might, for example, be a company, a body corporate, a corporation sole, a charity, a partnership, a government body or a public authority.

GENERAL

This Privacy and Cookies Policy (together with the documents and materials referred to in it) sets out the basis on which any personal data we collect from you or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

DATA CONTROLLER

When you provide personal information to us in circumstances where we are not required to process it on your behalf, for the purpose of the Data Protection Act 1998 (“Act”) we will be the data controller. In all other circumstances (and normally in relation to the services we provide to you), we will be the data processor.

INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- Information that you provide by filling in forms on any of our websites. By websites we mean our web portal <http://online.intercept-it.com> and all web pages and/or websites that are accessible from that portal. You can recognise these as they all contain www.intercept-it/, www.thecloudservice.co.uk or www.onlinedesktop.co.uk This includes information provided at the time of registering to use our websites, subscribing to any of the services we provide or signing up to work with us in some capacity (if applicable), posting material or requesting further information, support or services. We may also ask you for information when you report a problem with our portal or any of our services;
- If you contact us, we may keep a record of that correspondence;
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them;
- Details of transactions you carry out through our websites (including debit and credit card information, other account and payment information), the fulfilment of your orders, your choice of the services we provide and of the various options in relation to them;

- Details of your visits to any of our websites including, but not limited to, the times you log on and log off, traffic data, data stored on our servers, the applications that you use, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access;

IP ADDRESSES AND COOKIES

We may collect information about your computer including, where available, your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about browsing actions and patterns, and does not identify any individual.

For the same reason, we may obtain information about your general usage of our websites by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. We use two different types of cookie. The first type is known as a "session-based" cookie and is allocated to your computer only for the duration of your visit to our websites. It helps you to move around the websites more quickly and, if you have subscribed to our services, it allows us to give you information relevant to the services that you are using. This cookie automatically expires when you close down your browser.

The second type of cookie, known as a "persistent" cookie, is allocated to your computer only if you agree by selecting the "Remember Me" function. This cookie, if chosen, will remain on your computer for a period of time.

This cookie allows us to:

- welcome you as an individual when you log on to our websites;
- limit how often you see particular advertisements or announcements on our websites;
- identify your defaults for the control panel relevant to your use of our services;
- provide you with relevant self-help information;
- track where you have come from if you have come to our websites from another website;
- track how many times you visit a page or advertisement.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies:

However, if you select this setting you may be unable to access certain parts of our websites. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our websites.

Please note that other companies which advertise or offer their products or services on our websites may also use cookies, over which we have no control.

WHAT DO WE USE YOUR PERSONAL INFORMATION FOR?

We use information held about you in the following ways:

- to ensure that content from our websites is presented in the most effective manner for you and for your computer;
- to communicate with you about your access to, or use of, our services;
- to check that you are a registered customer if you call our support line. For security reasons we may ask you for some of the information you gave us when you registered and check this against our records;
- to carry out our obligations arising from any contracts entered into between you and us, particularly if you are one of our resellers or introducers;
- to collect subscription payments from you;
- to notify you about changes to our services or our policies or our website;
- to contact you to ask whether you would like to join in one of our research groups to help us improve our service to you;
- to improve our understanding of the type of customers we're attracting to our services and how they use our services;

- to provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.

If you are an existing customer, we will only contact you by electronic means (email or SMS) with information about goods and services similar to those which were the subject of a previous supply to you.

If you are a new customer, we will contact you by electronic means about goods and services which we think might interest you only if you have consented to this.

WHERE WE STORE YOUR PERSONAL DATA

We will not, except as agreed with you or in accordance with your instructions, carry out any processing of personal data on equipment situated outside the European Economic Area ("EEA") or transfer any personal data outside of the EEA.

However, we do not have any control over where our licensors (such as Microsoft and RIM) and your airtime provider may process such of your personal data that is essential to the provision of some of the services we provide, for example BlackBerry connectivity. They will process personal data in accordance with their own privacy policies and such processing may take place in a country outside of the EEA. As a result, that country's courts, governments or law enforcement agencies could obtain disclosure of such information under that country's laws. By submitting your personal data to us, you indicate that you are aware of this and that you consent to the transmission of your personal data to a country outside of the EEA and the use, storage and processing of your personal data in that country.

However, we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

SECURITY MATTERS

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you to choose a password you can remember but others will not guess, change it regularly and, if you do write it down, keep it somewhere safe and secure. We advise you not to share a password with anyone.

When you have finished your online session using any of the services we provide, make sure that you prevent your details being seen by anyone that you do not wish to see them. So, if you've logged in, remember to log off. We also recommend that you then close your browser, so any history of the session is cleared.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our websites; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

DISCLOSURE OF YOUR INFORMATION

We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We may disclose your personal information to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- if we or substantially all of our assets are acquired by a third party, in which case personal data held by it about our customers will be one of the transferred assets;

- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use ([http://online.intercept-it.com/acceptable use policy/](http://online.intercept-it.com/acceptable%20use%20policy/) or services terms and conditions [http://online.intercept-it.com/services terms/](http://online.intercept-it.com/services%20terms/) or other agreements; or to protect the rights, property, or safety of Intercept our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

NO DIRECT MARKETING

We will not use your personal data for direct marketing purposes; only to be able to introduce you to products or services that we think you might be interested in.

If you do not wish us to do this, please contact our data subject access manager at the address shown below.

Our websites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

ACCESS TO INFORMATION

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to:

Data Subject Access Manager
Intercept IT
The Baltic Exchange
38 St Mary Axe
London
EC3A 8BH