

# Privacy Policy

Most recently updated – 1 September 2023

## Introduction

This Privacy Policy sets out how Engage Smarter Ltd (“us” / “we”) use and protect any information that you give us when you use our sites.

We understand that your privacy is important to you and that you care about how your information is used and shared online. We are committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using our sites, you can be assured that it will only be used in accordance with this Privacy Policy.

This policy explains the areas of our sites that may affect your privacy and personal details. It explains how we process, collect, manage and store those details, and how your rights under the GDPR (General Data Protection Regulation) are adhered to.

We encourage you to read this Privacy Policy carefully and ensure that you understand it. If you have any questions, feedback, or concerns, you can contact us directly at [info@engagesmarter.ai](mailto:info@engagesmarter.ai).

Your acceptance of this Privacy Policy is deemed to be given when you first use our site. If you do not accept and agree with this Privacy Policy, you must stop using our sites immediately.

## Information about us

Engage Smarter Ltd (also referred to as “we”, “us”, “our” in this Policy) refers to the limited company registered in England and Wales under registration 12602779 with registered address at International House, 101 Kings Cross Road, London, WC1X 9LP, United Kingdom.

Engage Smarter Ltd operates under the **Engage Smarter** brand. The scope of this Privacy Policy includes the site [engagesmarter.co](https://engagesmarter.co) and any online tools or content hosted on these sites or any subdomains of these sites. In this Privacy Policy we refer to all of these collectively as “our sites”.

We can be reached at [info@engagesmarter.ai](mailto:info@engagesmarter.ai) for any questions, comments or complaints.

# What information do we collect?

## Automatic data collection

Some data will be collected automatically by our sites when you use them. We collect some or all of the following data:

- IP address
- Web browser type and version
- Operating system
- A list of URLs which indicates your activity on our sites, a referring site you came from, and the site you exit to

This automatic data collection is achieved by using cookies to distinguish you from other users of our website.

## Cookies

A cookie is a small file of letters and numbers that is stored on your browser or the hard drive of your computer.

We use the following types of cookies:

- Strictly necessary cookies - these are cookies that are required for the operation of our sites and questionnaire tools
- Analytical/performance cookies - these allow us to recognise and count the number of visitors and to see how visitors move around our sites. This helps us to improve the way our sites work
- Functionality cookies - these are used to recognise you when you return to our sites
- Targeting cookies - these cookies record your visit to our sites, the pages you have visited and the links you have followed. We will use this information to make our sites and communications with you more relevant to your interests

You can block cookies by activating the setting on your browser that allows you to refuse the setting of cookies. However, if you use your browser settings to block all cookies, including essential cookies, then you may not be able to access all of our sites.

## Voluntarily submitted data

Some data will only be collected if you voluntarily submit it to us and consent to us using it.

We collect voluntarily submitted data from you using web forms that you fill in, and also from information that you send to us via email, text message, web-chat, on paper or phone call.

We may collect some or all of the following data through these voluntarily submitted methods:

- Your name
- Contact information such as email addresses and telephone numbers
- Location information such as your address
- Demographic information including your age, gender and family situation
- Business details including job title, your profession and company name
- Details of your requests and communications with us

## Data collected by our online tools

Some other data may be collected by our online tools hosted on or sites. These online tools are recommendation engines and questionnaires that use your submitted data to provide you with personal insights and recommendations.

Data will only be collected by these tools if you voluntarily submit data into the tool and consent to how we use that data in the tool.

We may collect and use some or all of the following data in our questionnaire tools:

- Demographic information about you or your family
- Business and employment information about you or your family
- Behavioural information including your preferences and interests that you tell us about
- Summarised financial information you submit to the tools
- Information about your existing financial products and services that you tell us about
- Any other information about your situation or preferences which are submitted by you into the tools

We recognise that this data you submit to us is sensitive personal data to you. We handle this data carefully and securely as outlined in the section below on how we secure your data.

Note that we do not confirm the accuracy of any of the information you submit to us in our online tools. Any recommendations and insights you receive from these online tools will be based only on the information you submit.

The outputs from these tools are not intended to amount to advice on which you should rely. You must obtain separate professional or specialist advice before taking, or refraining from, any action on the basis of the content on our sites or

recommendations from our online tools. This important warning is also covered in our [Terms of Use](#).

## Email marketing list and marketing messages

We operate an email mailing list to inform users about relevant information and news, and to support our services.

Email messages may contain tracking beacons and tracked clickable links or similar technologies. These items track user activity within email marketing messages, including measuring if emails have been opened or if links have been clicked. We use this data to enable us to understand our interactions with you better and to provide you with more timely and more relevant information.

## How do we use personal information?

We use your data to provide the best possible products and services to you. This includes:

- Responding to communications from you
- Identifying products and services appropriate for you
- Personalising and tailoring your experience on our sites
- Market research
- Supporting our internal research and development of our online tools
- Analysing your use of our site and questionnaire tools to enable us to continuously improve our sites and your user experience
- Your account setup and administration
- Carrying out polls and surveys
- With your permission, communicating with you about products, services, offers or information which we think will be of interest to you
- With your permission, connecting you with third-party suppliers of products and services that have been identified as valuable to you
- Meeting our legal obligations, including prevention of fraud
- Meeting our own internal audit requirements
- Carrying out any other purpose indicated to you at the time the information was collected

We will not sell or rent your data to any third party.

We will share this data only with third-party service providers that are necessary to administer our services.

We may compile statistics about the use of our sites, including data on traffic, usage patterns, user numbers, sales and other information. All such data will be anonymised and will not include any personal identifying information.

# What legal basis do we have for processing your personal data?

## Legal basis of data processing

We will only process your personal data when at least one of the following legal bases applies:

- You have given consent to the processing of your personal data for one or more specific purposes
- Data processing is necessary for the performance of a contract with you or in order to take steps at the request of you prior to entering into a contract
- Data processing is necessary for compliance with a legal obligation that applies to us
- Data processing is necessary to protect the vital interests of you or another natural person
- Data processing is necessary for the performance of a task carried out in the public interest
- Data processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by your fundamental rights and freedoms

## Withdrawal of your consent

You may withdraw your consent for us to use your personal data as set out in this Privacy Policy at any time.

We will add a link to our communications to you that enables you to easily unsubscribe from future communications or adjust the details of the consent you have provided to us.

Alternatively you can withdraw your consent by contacting us at [info@engagesmarter.ai](mailto:info@engagesmarter.ai).

## When do we share personal data?

We may share your data with other companies within our group. This includes our holding company and its subsidiaries.

We may share your data with third-party service providers to supply some of our services or products on our behalf. These may include payment processing, delivery services, advertising and marketing services. These third-parties may require

access to some or all of your data. Where this is required, we will take reasonable steps to ensure that your data is handled safely, securely, and in accordance with your rights and our legal obligations.

In certain circumstances we may be legally required to share some personal data held by us where we are involved in legal proceedings, complying with legislation, a court order or a government authority. We do not require any further consent from you in order to share your data in such circumstances and will comply with any legally binding request that is made of us.

We currently contract with the following third-parties, where we may need to share some of your personal data:

- **Google Analytics** (<https://analytics.google.com/>) - for tracking how visitors use our sites, and the type of visitors, so that we can improve the user experience
- **DigitalOcean** (<https://www.digitalocean.com/>) - for storing and processing personal data
- **Hubspot** (<https://hubspot.com>) - for storing and processing personal data on clients and CRM services.

## Where do we store and process personal data?

Your personal data is stored and processed securely on a secure private cloud server, based in the United Kingdom.

For some services, some or all of your data may be transferred outside of the UK or the European Economic Area. If we do store or transfer data outside the UK or the EEA, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the UK data protection rules. Such steps may include, but not be limited to, the use of legally binding contractual terms between us and any third parties.

## How do we secure personal data?

Data security is of great importance to us and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected by us.

Our security measures include, but are not limited to:

- Data encryption and SSL on all of our sites and online tools
- Restricted access to servers and data to only essential staff

- Database encryption for all database that contain personal data
- Secure VPN gateways in order to prevent any unauthorised access, use or destruction of data on our secure servers
- Regular backups in order to enable us to recover personal data and ensure business continuity
- Training for any staff or contractors that may need to deal with personal data

## How long do we keep your personal data for?

We only keep your personal data for as long as we need it in order to use it as described in this Privacy Policy.

Personal data for business contacts will be retained for as long as we keep a relationship with a business contact or their organisation.

Some personal data may be held for longer periods where extended retention periods are required by law or regulation, or in order to establish, exercise or defend our legal rights.

When we delete your personal data, we will ensure that we remove the data that is personally identifiable to you.

Note that when we delete your personal data, the personal data may remain within our backups for some weeks until those backups rotate and are themselves removed.

## Your rights in relation to personal data

Under the GDPR, you have have the following rights:

- the right to request access to, deletion of or correction of, your personal data held by us
- the right to complain to a supervisory authority
- the right to be informed of what data processing is taking place
- the right to restrict data processing
- the right to data portability
- object to processing of your personal data
- rights with respect to automated decision-making and profiling (see following section)

Please contact us at [info@engagesmarter.ai](mailto:info@engagesmarter.ai) to make requests or find out more information.

## Complaints

If you wish to make a complaint, please contact us at [info@engagesmarter.ai](mailto:info@engagesmarter.ai) and we will respond to your complaint promptly.

If you wish to make a complaint to the supervisory authority, the relevant UK supervisory authority is the Information Commissioner's Office which can be contacted at <https://ico.org.uk/>.

## Use of automated decision-making and profiling

We may use automated decision-making and profiling in delivering the following services to you:

- Providing you with recommendations or tips based upon the data you voluntarily submit to us in our online tools. These recommendations and insights are generated by algorithms and models that we have developed.
- The timing and content of communications that we send out to you may be generated automatically by our marketing automation systems. These systems are supported by machine learning algorithms and campaign rules. This helps us provide you more relevant and timely information.
- Segmentation of customers is used to enable us to better predict your likely needs for specific products and services. This is performed using propensity models that we have developed. This helps us provide you with more relevant information, and enables us to allocate our own scarce resources towards users with a larger or more urgent need for our services

Our models and methods used in automated decision-making and profiling use standard statistical and machine learning techniques.

We use testing of models and analysis of features to minimise the risk of errors. We routinely exclude any variables from models that could be a source of discrimination, including in particular gender, race or sexual discrimination.

The majority of our automated decision-making models do not require personal data for development or running. They work well using only non-identifiable data.

## What happens if our business changes hands?

We may expand or reduce our business from time to time. This may involve the sale of all or part of our business, or the transfer of control. In this case, data we have collected will be transferred to the new controlling party, where that data is relevant



to that part of the business. Under the terms of this Privacy Policy, the new partner will be permitted to use the data for the purposes for which it was originally collected by us.

In the event that any of your data is to be transferred in this way, you will be contacted and informed of the changes. You will be given the choice to have your personal data deleted or withheld from the new owner or controller.

We may from time to time share anonymised statistics with third parties such as prospective investors, affiliates, partners and advertisers. Such information will not include personally identifiable information.

## How to contact us?

If you have any questions about this Privacy Policy or how it applies to our sites or our tools please contact us:

- By email at [info@engagesmarter.ai](mailto:info@engagesmarter.ai)
- Write to us at Data Protection, Engage Smarter Ltd, International House, 101 Kings Cross Road, London, WC1X 9LP, United Kingdom.

## Updates to this Privacy Policy

We may change this policy from time to time by updating this document. If we make modifications, we will notify you by revising the Most Recently Updated date at the top of this Policy. You should check this page from time to time to ensure you are happy with any changes.