

SPUTNIK INTERNET LTD PRIVACY POLICY**Last Updated: August 2021****1. INTRODUCTION AND GENERAL TERMS**

This privacy policy sets out how we use data relating to you that you provide to us, or that we may collect, through our website (the “**Website**”). The Website is owned and operated by Sputnik Internet Ltd, a company registered in England and Wales under company number 04679930 and with our registered address at 20 Edge Lane, Chorlton, Manchester, M21 9JF (“**Sputnik**”, “**we**”, “**us**” or “**our**”).

If you have any questions or comments about this Privacy Policy please contact us on info@sputnikinternet.com.

We are committed to protecting and respecting your privacy. This policy explains what personal information we collect from you and how that information will be processed. Where we decide the purpose or means for which personal data you supply through these online services is processed, we are the “data controller.” We will comply with all applicable data protection laws, including the General Data Protection Regulation 2016/679.

This policy explains the following:

- What information we may collect about you
- How we will use information we collect about you
- Whether we will disclose your details to anyone else
 - Your choices and rights regarding the personal information you have provided to us.

This privacy policy should be read in conjunction with our **Terms of Website Use**.

The Website may contain hyperlinks to websites owned and operated by third parties. They will govern the use of personal information you submit or which is collected by cookies whilst visiting these websites. We do not accept any responsibility or liability for

the privacy practices of such third party websites and your use of them is at your own risk.

2. **INFORMATION WE MAY COLLECT ABOUT YOU**

We collect and process the following information which may include your personal data.

(“Submitted Information”)

You may give us information about you by filling in forms when using our services and our Website.

This can include:

- your name;
- your username;
- your e-mail address;
- your password;
- your telephone number;
- your postal address; and
- your billing address.

We may also obtain sensitive personal data about you if you voluntarily supply it through the Website. For example, when you communicate with us via the contact page on the Website.

Your Browsing Activities

In relation to your activity on our online services, we may collect information relating to the web address that you arrive from or click through to, pages viewed, page response times, download errors, the length of time you spend on certain pages, page interaction information such as scrolling, clicks, and methods used to browse away from our Website.

How you use our Website (“Analytics”)

We may collect technical information about your computer and/or device that may identify you, including your IP address, operating system, browser type, time-zone and browser plug-in details through third party analytics providers. These third party analytics providers may collect analytics on our behalf and in accordance with our instructions, and their applicable privacy notice.

Information about you collected from Third Parties (“Content Information”)

We may collect information about you from third party service providers (like social media companies, marketing partners or public databases) to use along with the information that we collect from you.

Other companies may set their own cookies or similar technologies when you visit the Website. This includes third parties that we have engaged to provide services on our behalf (like website analytics), as well as third parties that deliver content (like videos from YouTube).

3. WHY WE COLLECT INFORMATION ABOUT YOU

To provide the Website

We will use information about you for providing the website and delivering our services to you.

To Understand how our Website is used

We process information to understand how visitors use our Website. This processing is necessary for us to pursue our legitimate interest of (i) ensuring that our Website functions properly so that you and other users have the best experience when using it, and (ii) improving the quality of our Website and providing a better experience to our users.

As Data Processor for our Clients.

As a technical partner for our Clients, we are involved in the handling and processing of data controlled by the Client.

This information varies from time to time, but can include name, address, email address, vehicle details and criminal convictions.

4. DATA SHARING

We will share your information with third parties only in the ways that are described in this privacy policy. If you would like to find out more about how the third parties listed in this policy use your information, this should be set out in their respective privacy policies.

Personnel, Suppliers or Subcontractors: We keep your information confidential, but may disclose it to our personnel, suppliers or subcontractors insofar as it is reasonably necessary

for the purposes set out in this privacy policy. However, this is on the basis that they do not make independent use of the information, and have agreed to safeguard this information.

Required by law: In addition, we may disclose your information to the extent that we are required to do so by law (which may include to government bodies and law enforcement agencies); in connection with any legal proceedings or prospective legal proceedings; and in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention).

Merger or acquisition: If we are involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email, account message and/or a prominent notice on our website of any change in ownership or uses of this information, as well as any choices you may have regarding this information.

Enforcement: We may also disclosure your personal information to third parties in order to enforce or apply the terms of agreements, to investigate potential breaches, or to protect the rights, property or safety of Rowan, Rook & Decard, our customers or others.

5. YOUR RIGHTS IN RELATION TO PERSONAL DATA WHICH WE PROCESS RELATING TO YOU

You have the right to access, modify, rectify and delete any data that concerns you over the way we process personal data relating to you. We aim to comply without undue delay, and within one month at the latest.

To make a request, please let us know at via the info@sputnikinternet.com.

If you do provide us with personal information we generally retain it for as long as is otherwise necessary for us to provide the Website to you, or as otherwise described in this privacy policy.

6. CHILDREN

You should be at least 13 to use our Website. We do not use the Website to knowingly solicit data from or market to children under the age of 13. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should

contact us via the contact details detailed at the top of this privacy policy. We will delete such information from our files within a reasonable time.

7. SECURITY

We will take reasonable physical, technical and organisational precautions to protect your personal information from unauthorised access, use or disclosure. For example, we use computer systems with limited access in controlled facilities to store personal info. We also use technologies like encryption and hashing to protect some of the info we collect.

Please be aware that, although we endeavour to provide reasonable security for information we process and maintain, no security system can prevent all potential security breaches. By choosing to share your personal information with us you agree and accept that you do so at your own risk.

8. INTERNATIONAL DATA TRANSFERS

Where we transfer your data outside of the EEA, we have agreements in place with those parties which include standard data protection clauses adopted by a data protection regulator and approved by the European Commission to ensure that appropriate safeguards are in place to protect your personal data. If you would like to find out more about these safeguards, please let us know by writing to us through the Support Services.

9. COOKIES

A cookie is a text file placed onto your device when you access the Website. We use cookies and other online tracking devices such as web beacons, and flash object storage to deliver, improve and monitor the Website, including in the following ways:

Authentication	To log you into your account on the Website and keep you logged in.
Preferences	To remember information about you such as your preferred language and configuration.

Analytics	To help us understand how you use the Website, and how often, so we can improve it to deliver a better experience for our users.
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The information we obtain from our use of cookies will not usually contain your personal data. Although we may obtain information about your device such as your IP address, your browser and/or other internet log information, this will not usually identify you personally.

Please note that if you choose to disable cookies, or similar technologies, on your device you may be unable to make full use of the Website.

10. **CHANGES**

We may make changes to this policy from time to time, and such changes will be posted on this page. You should check this page from time to time to ensure that you are aware of any changes. Where appropriate we may notify you of any changes by email.

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