

**WESSEX TECHNOLOGY OPTO-ELECTRONIC PRODUCTS LIMITED (WE) ARE COMMITTED TO PROTECTING AND RESPECTING YOUR PRIVACY.**

**1. SCOPE OF POLICY**

This policy (together with our end-user licence agreement (EULA) available when you download the App and any additional terms of use incorporated by reference into the EULA, together our Terms of Use) applies to your use of:

- 1.1 Our COUNTERMARK® website at [countermark.com](https://countermark.com) (Website) and any linked site under our control.
- 1.2 Our COUNTERMARK® Office add-in (Add-in), once installed as an addition to your Microsoft® Word software.
- 1.3 Our COUNTERMARK® mobile application software (App) available on our site or via several third-party application stores (App Site), once you have downloaded or streamed a copy of the App onto your mobile telephone or handheld device (Device).
- 1.4 Any of the services accessible through the App, the Add-in and Website, (Services).

This policy 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. Any words with capital letters which are not defined when you first see them are defined in the EULA.

For the purpose of General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018, the data controller is Wessex Technology Opto-Electronic Products Limited of Wellesley House, 204 London Road, Waterlooville, Hants, PO7 7AN, United Kingdom.

**2. INFORMATION WE COLLECT FROM YOU**

We will collect and process the following data about you:

- 2.1 Information you give us (Submitted information): This is information you give us about you by filling in forms on the App Site and the Services Sites (together Our Sites), or by corresponding with us (for example, by e-mail or chat). It includes information you provide when you search for our App or Service, register to use the App Site, download the App, subscribe to any of our Services

or use the App and when you report a problem with the App, our Services, or any of our Sites. If you contact us, we will keep a record of that correspondence. The information you give us may include your name, address, e-mail address and phone number, the Device's phone number, age, username, password and other registration information, financial and credit card information, personal description and photograph.

- 2.2 Information we collect about you and your device: Each time you visit one of our Sites or use the App or Add-in we may automatically collect the following information:
- (a) technical information, including the type of mobile device you use, a unique device identifier (for example, your Device's IMEI number, ICCID (SIMID), GUID (Globally Unique Identifier), the MAC address of the Device's wireless network interface, or the mobile phone number used by the Device), mobile network information, your mobile operating system, the type of mobile browser you use, time zone setting, contact information and login information (Device Information);
  - (b) Location information: We also use your Device's location services to determine your current location when you read a Countermark. Some of our location-enabled Services require your personal data for the feature to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose. You can withdraw your consent at any time by disabling location services on your Device and if you do so, you may not be able to read any Countermark;
  - (c) Image information from the cameras: We collect images of scanned Countermarks which can identify the item carrying the Countermark and other information, for example where the item was purchased.
- 2.3 Information provided to us by Customers for Private Countermarks: Our Customer can designate a Countermark as "Private" allowing the data associated with the Countermark to be accessed by identifiable users / mobile phones. When our Customer does this they will provide us with the authorised user's name, email address and phone number or similar data. This information is used by us to verify the identity of the person attempting to read the Private Countermark.
- 2.4 Association of Categories of Information: We may associate any category of information with any other category of information and will treat the combined information as personal data in accordance with this policy for as long as it is combined.

### **3. COOKIES**

We use cookies to distinguish you from other users of the App, App Site, Appstore, Add-in or Service Site. This helps us to provide you with a good experience when you use the App or browse any of the sites and also allows us to improve the App and Our sites. For detailed information on the cookies we use and the purposes for which we use them, see our Cookie Policy.

### **4. USES MADE OF THE INFORMATION**

The App, Website and Add-in do not display adverts from third parties. We will never use your information for the purpose of advertising. The App will normally provide information from our Customer who issues the Countermark, such as an image, Snippet text or link to a website they nominate (Associated Data).

We require our Customers not to submit Associated Data content as Snippets which is offensive, illegal, immoral, prejudicial to health, in breach of third party intellectual property rights, infringes any person's right to privacy or which contains any form of malware. However please be aware that we do not audit or control what data a Customer chooses to make into Associated Data.

If you provide financial information such as credit card details, this is used only as a form of identity verification. We do not charge you for using the App. Credit card details supplied via the Website may be used to charge for Services.

We use information held about you in the following ways:

#### **4.1 Public Countermarks**

If you use the App to read a public Countermark, we will share anonymised Submitted, Device and Location Information with our Customer which issued the Countermark. No information which specifically identifies you will be provided to our Customer.

We may however provide our Customer with anonymous aggregate information about Users (for example, we may inform them that 100 women in a particular US state read the Countermark in any given month).

#### **4.2 Private Countermarks**

If you use the App to read a Private Countermark, we will share such of your Submitted, Device and Location Information with our Customer which issued the Countermark as is necessary to confirm your identify, location and device you are using in order to determine if you are authorised to retrieve the Snippet, text, data or hyperlink to which the Countermark relates.

#### **4.3 Registered Countermarks**

If you use the App to read a Registered Countermark, we will share such of your Submitted, Device and Location Information with our Customer which issued the

Countermark as is necessary to confirm your identify, location and device you are using in order to retrieve the Associated Data.

#### **5. OUR CUSTOMER'S USE OF INFORMATION**

We provide your information to Customers strictly for the purposes set out above in Uses made of the information. However, we do not control or manage how Customers use your information and we accept no responsibility for our Customers' use of the information for any other purposes.

Without prejudice to the foregoing, if you believe a Customer has misused your information, you can notify us in accordance with the Contact section below. We will pass on your concern to our Customer and we may, in our absolute discretion, agree to assist an investigation into any mis-use although we shall have no legal obligation to do so.

#### **6. OUR OWN USE OF YOUR INFORMATION**

You agree that we have the right to 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 Companies Act 2006.

We will disclose your personal information to third parties:

- 6.1 In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- 6.2 If Wessex Technology Opto-Electronic Products Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- 6.3 If we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request, in order to:
  - (a) enforce or apply our Terms of Use and any other agreements with you or to investigate potential breaches; or
  - (b) protect the rights, property or safety of Wessex Technology Opto-Electronic Products Limited, our Customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

These permissions will only be activated during the Countermark read process.

## **7. WHERE WE STORE YOUR PERSONAL DATA**

The data that we collect from you will generally be transferred to, and stored at, destinations, and processed by staff who work for us or for one of our suppliers, inside the European Economic Area (EEA). These staff will be engaged in the fulfilment of your request to retrieve Associated Data and the provision of support services. We may occasionally need to transfer data outside the EEA and have staff outside the EEA process it where this is necessary to ensure we can provide you with our services. You consent to us transferring your data outside EEA in these circumstances.

### **7.1 Your consent to processing**

By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

### **7.2 Cloud storage and backup**

All information we hold about you is stored on secure servers managed and operated by world-class cloud services such as Microsoft Azure.

Countermark data and Customers Associated Data is automatically and frequently backed up on secure servers managed and operated by world-class services such as Microsoft Azure. The backup data is retained only for sufficient time to enable reasonable recovery of data in case of loss or corruption of data.

### **7.3 If you have a password**

Where we have given you (or where you have chosen) a password that enables you to access certain parts of Our Sites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

### **7.4 Inherent risk of internet transmission**

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 Sites and 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.

## **8. ACCESS TO INFORMATION**

The Data Protection Act 2018 (GDPR) gives you the right to access information held about you. Your right of access can be exercised in accordance with that Act. Any routine access request will be processed free of charge, but charges may apply for repeat or excessive requests.

If you believe that any information we hold about you is incorrect, incomplete or out of date, you may request us to update it by contacting us through the email or phone numbers displayed on our website, [countermark.com](https://countermark.com).

**9. CHANGES TO 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 SMS, by e-mail or when you next start the App. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the App or the Services.

**10. CONTACT**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to us via the email displayed on our website at [countermark.com](https://countermark.com).