**Cotrinity Ltd  
PRIVACY POLICY**

At Cotrinity Ltd, we respect your privacy and we are committed to protecting your personal data. This privacy notice informs you about how we look after your personal data when you visit our website, use our services or otherwise conduct business with us, and it explains your privacy rights and how the law protects you.

**Important information and who we are**

1. **Purpose of this privacy notice - This privacy notice aims to give you information on how we collect and process your personal data through your use of this website, use of service or other business you may conduct with us including any data you may provide through this website when you create an account.**

This website is not intended for children and we do not knowingly collect data relating to children.

**Controller**

We are Cotrinity Ltd and Cotrinity Ltd is the controller and is responsible for your personal data. Our registered address is **Fifth Floor, 11 Leadenhall Street, London, England, EC3V 1LP**, UK. We are registered with the Information Commissioner as a data controller and our registration number is ZA059890.

If you have any questions about this policy or about your rights regarding your personal data, you can contact us by sending us a message via our website.

**Changes to the privacy notice and your duty to inform us of changes**

This version of our privacy policy was last updated on 1st September 2022

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

1. **The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We collect only that personal data from you that we need in order to provide you with the products you request through our website and otherwise, in order to operate our business in the way that you would anticipate.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

|  |  |
| --- | --- |
| **Contact Data** | includes first name, last name and email address. |
| **Other Identifier Data** | Other Identifier Data includes role, username, company name. |
| **Financial Data** | includes business bank account and business payment card details, VAT number, billing address (unless you use Paypal to process any payment in which case we do not process or store that financial data). |
| **Transaction Data** | includes details about payments to and from you and other details of products you have purchased from us (including details of any payment you have made to us via Paypal). |
| **Technical Data** | includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website. |
| **Connection Data** | includes the type of device you use (**Device**), a unique device identifier (for example, your Device's IMEI number, the MAC address of the Device's wireless network interface, or the mobile phone number used by the Device), network information, your mobile operating system, screen type and resolution, the type of web browser you use, the time zone setting. |
| **Location Data** | includes details of your use of our service including, but not limited to, traffic data, statistics of content uploaded, downloaded and viewed. We may make use of location data sent from Devices. You can turn off this functionality at any time by turning off the location services settings for the mobile application on the Device. If you use these location services, you consent to us and our affiliates' and licensees' transmission, collection, maintenance, processing and use of your location data and queries to provide and improve location-based products and services. We may also use other technology (e.g. your time zone and IP address) to determine information regarding your current location. Some of our location-enabled services require your personal data for the feature to work. |
| **Usage Data** | includes information about your use of our service, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); elements you viewed or words you searched for; page response times; download errors; length of visits; interaction information (such as scrolling, clicks, and mouse-overs). |
| **Communications Data** | includes emails, note of conversations, and records of online chats through Cotrininty.com |

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

1. **How is your personal data collected?**

We use different methods to collect data from and about you including through:

* + **Direct interactions.** You may give us your Identity, Contact, Financial and Communications Data by submitting information on our website or by corresponding with us or other users by phone, email on our platform or otherwise (including when you use our support service). This includes personal data you provide when you:
    - enquire about our services;
    - create or use your account on with us;
    - collaborate and interact with other users of our services;
    - otherwise use our services
  + **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical, Usage, Connection and Location Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.
  + **Third parties or publicly available sources.** We may receive personal data about you from various third parties as set out below:
    - Technical Data from the following parties:
      1. analytics providers such as Google based outside the EU who provide server monitoring tools to monitor the status of our APIs and the type and volume of queries being made to them.
      2. advertising networks such as Twitter, Google, Adwords and Linkedin which may have servers based outside the EU; and
         * Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Paypal which may have servers outside the EU.

1. **How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

* + Where we need to perform the contract we are about to enter into or have entered into with you.
  + Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
  + Where we need to comply with a legal or regulatory obligation.

From time to time, we will send you marketing communications by email about the products we offer and how they are being updated and can offer new features and functionalities. We offer you the chance to opt out of receiving such emails at the point that you register your contact details with us and whenever we send such a communication, we include an option for you to unsubscribe from receiving further such communications.

**Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us at support@3drepo.org if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

|  |  |  |
| --- | --- | --- |
| **Purpose/Activity** | **Type of data** | **Lawful basis for processing** |
| To register you as a new user and maintain your account | * + Contact   + Other Identifier | Performance of a contract with you |
| To share your details with other users or collaborators who are involved on the same project (where you have opted in to this on your user account) | * + Contact   + Other Identifier | * + Performance of a contract with you   + Necessary for our legitimate interests (providing the means of collaboration between users on our platform) |
| To process and deliver your order including:   * + Manage payments, fees and charges   + Collect and recover money owed to us | * + Contact   + Financial   + Transaction   + Communications | * + Performance of a contract with you   + Necessary for our legitimate interests (to recover debts due to us) |
| To manage our relationship with you which may include notifying you about changes to our terms of working or relevant updates | * + Contact   + Financial   + Communications | * + Performance of a contract with you   + Necessary for our legitimate interests (to keep our records updated and to study how users use our products) |
| To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | * + Contact   + Financial   + Technical   + Communications | Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) |
| To deliver relevant website content and marketing messages to you | * + Contact   + Other Identifier   + Usage   + Communications   + Technical | Necessary for our legitimate interests (to study how customers use our products, to develop them, to grow our business and to inform our marketing strategy) |
| To use data analytics to improve our website, products/services, marketing, customer relationships and experiences | * + Technical   + Usage   + Location   + Connection | Necessary for our legitimate interests (to define types of customers for our products, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) |

**Cookies** You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see [Cookies Policy](https://www.3drepo.io/cookies)

1. **How is your personal data collected?**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

* + Amazon servers in London or Canada, depending on your user specified preference.
  + Paypal, Google Cloud Mapbox and Dropbox or other similar support service provider.
  + Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

1. **International transfers**

To support our business functions, we need to send your personal data to companies that may have servers based outside the EEA.

One of our hosting companies is located in Canada which you can opt to use for your account. This hosting company is based in a country that has been deemed to provide an adequate level of protection for personal data by the European Commission. You do not have to choose this Canada hosting option and you are free to choose another UK hosting company if you prefer.

Where we use certain other service providers (such as Google Cloud, Paypal and Dropbox), we may use specific contracts approved by the European Commission, which give personal data the same protection it has in Europe.

Please contact us via our website messaging service if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

1. **Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

1. **Data retention**

**How long will you use my personal data for?**

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| --- | --- | --- |
| **Request access to your personal data (commonly known as a "data subject access request").** | | This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. |
| **Request correction of the personal data that we hold about you.** | | This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. |
| **Request erasure of your personal data.** | | This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. |
|  |  |
| **Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.** | | You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms. |
| **Request restriction of processing of your personal data.** | | This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it. |
| **Request the transfer of your personal data to you or to a third party.** | | We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. |

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

As regards all personal data, we aim to hold this for no longer than 10 years and in respect of the personal data obtained through our consumer accounts, we delete all such personal data from our records 7 days following the closure of your account with us.

1. **Your legal rights**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns about data protection before you approach the ICO so please contact us in the first instance.

**You also have the right in certain circumstances to:**

**No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

**What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.