

# LIKEZERO Limited: Privacy Policy

Last updated: 21st March 2023

## 1 Introduction

Welcome to our Privacy Policy.

Your personal data is collected by LIKEZERO Limited when you visit this website and when you engage with us in connection with our services. LIKEZERO Limited is the "data controller" in relation to the collection and processing of your personal data for this purpose. "We", "us", "our" and "LIKEZERO" are used in this notice to refer to LIKEZERO Limited.

If you have any questions in relation to our use of your personal data or this Privacy Policy, please contact us using the contact details given at Section 11 (*Contact us*) below.

We respect your privacy and are committed to protecting your personal data. This Privacy Policy explains how we collect and process your personal data when you:

1. use our website;
2. contact us directly or enquire with us about our services;
3. engage us or purchase a service from us; and
4. sign up to receive updates and newsletters from us.

It also explains the purposes for which we process your personal data, who your personal data may be shared with and the rights to which you may be entitled and your choices about our use of your personal data.

This website, and the services we offer, are not intended for children. We do not knowingly collect data about children. If you become aware that we may have been given data about a child, please contact us as soon as possible.

## 2 The data we collect about you

Personal data means any information about an individual from which that person can be identified. It does not include data from which it is no longer possible to identify who it relates to (anonymous data).

We have identified below the types of personal data about you we may collect, use, store and transfer in conducting our business:

- (a) **Identity Data:** your full name, title, name of organisation, and role at organisation;
- (b) **Contact Data:** your billing address, email address and telephone numbers;
- (c) **Transaction Data:** details and records about the services you have purchased from us;
- (d) **Information from public sources:** e.g. LinkedIn and similar professional networks, directories or internet publications;
- (e) **Customer Relationship Data:** details of your relationship with us (including how we manage and administer that relationship), the services we think you might be interested, information

relating to any queries or service issues that arise in connection with our relationship with you, and details of contact we might have with you;

- (f) **Technical Data:** internet protocol (IP) address, 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;
- (g) **Usage Data:** information about how you use our website; and
- (h) **Marketing and Communications Data:** your preferences in receiving marketing from us, your communication preferences, and details and analysis regarding the communications you have received from us and how you have engaged with those communications.

We may also collect, use and share **aggregated data** such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data, but we will only consider it as aggregated data when it cannot directly or indirectly reveal your identity. For example, we may aggregate details about our engagement with you to understand how to improve our sales process. 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 Policy.

We do not collect any **special categories of personal data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

#### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **3 How is your personal data collected?**

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

- (a) **Direct interactions:** You may give us your Identity, Contact, Transaction, Customer Relationship and Marketing and Communication Data by filling in webforms or by corresponding with us by post, phone, email or in person. This includes personal data you provide or we collect from you when you:
  - (i) enquire about our services;
  - (ii) purchase any services from us;
  - (iii) engage or interact with us during the course of our relationship with you;
  - (iv) contact us about any query, complaint or service issue with us;
  - (v) request marketing to be sent to you; or
  - (vi) give us feedback or contact us.
- (b) **Third parties or publically available sources:** We will receive personal data about you from various third parties and public sources as set out below:

- (i) Identity and Contact Data from professional networks, directories or internet publications and other publically available sources;
- (ii) Technical Data from the following parties:
  - analytics providers;
  - advertising networks; and
  - search information providers;
- (iii) Contact and Transaction Data from providers of technical services;

(c) **Automated technologies and interactions:** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our Cookie Policy for further details.

LIKEZERO may supplement the information that you provide to us, or which we are given, with information that we receive or obtain from other sources, such as from our professional advisors, partners, and agents of LIKEZERO, and third parties with whom we interact.

## 4 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:

- (a) where we need to perform the contract we are about to enter into or have entered into with your organisation;
- (b) 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; or
- (c) where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data. Although, where required by law we will get your consent before sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

### Purposes for which we use your personal data

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

Please 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 if you need further 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, including any legitimate interests pursued
Onboarding customers	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of our contract with you (or your organisation).</li> </ul>

<p>When you engage with us about obtaining our services and to register you and your organisation as a new customer.</p>	<ul style="list-style-type: none"> <li>• Customer Relationship</li> <li>• Information from public sources</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests (to manage our relationship with you)</li> <li>• Necessary to comply with a legal obligation</li> </ul>
<p><b>Contract Management</b></p> <p>To provide our services with you and manage our contract with you, including:</p> <p>(a) arranging payment; and (b) managing any service issues that arise.</p>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Customer Relationship</li> <li>• Transaction</li> <li>• Marketing and Communications</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of our contract with you.</li> <li>• Necessary for our legitimate interests (providing service and client support and to recover debts due to us).</li> </ul>
<p><b>Relationship management</b></p> <p>To manage our relationship with you which may include:</p> <p>(a) communicating with you; (b) managing any queries, complaints or service issues that may arise; (c) engaging with you to understand your service feedback; (d) discussing our range of services with you; (e) assisting you in demonstrating how the functionality of our services can further assist you; and (f) notifying you about changes to our terms or Privacy Policy.</p>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Transaction</li> <li>• Customer relationship</li> <li>• Marketing and Communications</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of our contract with you.</li> <li>• Necessary to comply with a legal obligation.</li> <li>• Necessary for our legitimate interests (to manage our relationship with you, keep our records updated and to study how customers use our products/services).</li> </ul>
<p><b>Administration</b></p> <p>To administer and protect our business and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).</p>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Transaction</li> <li>• Customer relationship</li> <li>• Technical</li> <li>• Usage</li> <li>• Marketing and Communication</li> </ul>	<ul style="list-style-type: none"> <li>• 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).</li> <li>• Necessary to comply with a legal obligation.</li> </ul>
<p><b>Website and online advertising</b></p> <p>To deliver relevant website content and advertisements to</p>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Usage</li> <li>• Technical</li> </ul>	<p>Necessary for our legitimate interests (to study how service users use our products/services, to develop them, to</p>

you and measure or understand the effectiveness of the advertising we serve to you.	<ul style="list-style-type: none"> <li>• Marketing and Communication</li> </ul>	develop our business and to inform our marketing strategy).
<p><b>Improving our website and products/services</b></p> <p>To use customer usage and experience and data analytics to improve our website, services, marketing, customer relationships and experiences.</p>	<ul style="list-style-type: none"> <li>• Technical</li> <li>• Usage</li> <li>• Transaction</li> <li>• Customer relationship</li> </ul>	Necessary for our legitimate interests (to define types of service users for our services, to keep our website updated and relevant, to develop our business and services, and to inform our business and marketing strategy).
<p><b>Keeping you informed</b></p> <p>To make suggestions and recommendations to you about services that may be of interest to you or your organisation.</p>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Technical</li> <li>• Transaction</li> <li>• Usage</li> <li>• Customer relationship</li> <li>• Marketing and Communications</li> </ul>	<ul style="list-style-type: none"> <li>• Consent (where you have opted-in to receive updates and promotional materials from us, for example, by signing up to our mailing list).</li> <li>• Necessary for our legitimate interests (to develop our products/services and grow our business).</li> </ul>

## Marketing

We may use your personal data to identify what services we think may assist, or be of interest to, you or your organisation. This is how we decide which updates, services and offers may be relevant for you.

You may receive marketing communications from us if you have requested information from us, or subscribed to or purchased services from us where we are entitled to send these you to in accordance with applicable law. Alternatively, you may receive marketing communications where you have specifically opted-in to receive these (for example, by signing up for updates or newsletters on our website).

You can ask us to stop sending you marketing at any time by clicking "unsubscribe" on any email marketing sent to you or alternatively by contacting our Director of Operations on the details given below in Section 11 (*Contact us*).

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

## Cookies

This website uses cookies to improve your experience while you navigate through the website. Out of these cookies, the cookies that are categorised as "necessary" are stored on your browser as they are essential for the working of basic functionalities of the website. We also use third-party cookies that help us analyse and understand how you use this website. These cookies will be stored in your browser only with your consent.

For more information about the cookies we use and how you can control what cookies we set, please see our Cookie Policy.

## Change of purpose

We will only process your personal data for the purposes for which we collect it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

## 5 Disclosure and transfer of your personal data

We may share your personal data with the third parties set out below for the purposes set out in the table at Section 4 (*How we use your personal data?*) above:

- (a) to other companies in the LIKEZERO group, who will act as independent data controllers, joint controllers, or data processors (depending on the purpose for which the group entity receives the data), and who are based in the United Kingdom, and who provide IT and system administration services and undertake leadership reporting;
- (b) vendors who will process your personal data on our behalf and under our written instructions to carry out their services during the course of our business, such as [IT service providers, financial institutions, customer relationship management vendors and other cloud-based solutions providers that are used by us in conducting our business. We contract with such vendors to ensure that they only process your personal data under our instructions and ensure the security and confidentiality of your personal data by implementing the appropriate technical and organisational measures for such processing;
- (c) our professional advisors (e.g. lawyers, accountants, auditors, etc);
- (d) third parties to whom we are required to transfer personal data by law, such as law enforcement bodies, governmental and regulatory bodies, the courts and other competent authorities that may request personal data in connection with any inquiry, court order, or other legal or regulatory procedures which we would need to comply with;
- (e) we may share personal data to establish or protect our legal rights, property or safety, or the rights, property or safety of others, or to defend against legal claims; and
- (f) any third party connected with business transfers; we may transfer your personal data to third parties, in connection with a reorganisation, restructuring, merger, acquisition, or transfer of our business or assets, provided that the receiving party agrees to treat your personal data in a manner consistent with data protection law.

## 6 International transfers

We will transfer the personal data we collect about you to countries outside the United Kingdom and/or European Union (such as the USA) in order to perform our contract with you and for the legitimate interests identified above in Section 4 (*How we use your personal data?*). In certain cases, there will not be an adequacy decision by the United Kingdom authorities and/or the European Commission in respect of those countries (for example, for the USA). This means that the countries to which we transfer your data may not be deemed to provide an adequate level of protection for your personal data.

However, where those countries are deemed not to provide an adequate level of protection, to ensure your personal data is properly protected in line with UK data protection law, the transfer of this information is governed by a contract including Standard Contractual Clauses.

We may also rely on any other international transfer mechanisms that are available to us under UK and/or EU data protection law to ensure that the transfer of your personal data outside of the United Kingdom and/or European Union will comply with applicable data protection laws.

If you would like to obtain copies of the regulator-approved Standard Contractual Clauses or further information on any other international transfer mechanism used by us please contact us at the details given in Section 11 (*Contact us*) below.

## 7 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.

## 8 Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

When we no longer need to use your personal data, we will remove it from our systems and records, and or take steps to anonymise it so that you can no longer be identified from it (unless we need to keep your information to comply with legal or regulatory obligations we are subject to).

In some circumstances you can ask us to delete your data (please see Section 9 (*Your legal rights*) below for further information).

## 9 Your legal rights

Under data protection law, you have certain rights in relation to your personal data. Please note that many of these rights are not absolute, and we may have grounds not fully complying with your request to exercise them (for example, where we are (a) required or permitted by law to process your personal data in a way that is incompatible with your request, or (b) able to rely on exemptions under data protection law which entitle us to process your personal data in a way that is incompatible with your request). Where such circumstances apply, we will inform you of this at the time you make a request to exercise your rights.

1. **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.

2. **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.
3. **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where we do not have a basis for continuing to hold 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 applicable law. Please 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.
4. **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.
5. **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 don't 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.
6. **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.
7. **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

### **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). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

### **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 access someone else's personal data on their behalf (or to exercise any of the 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 could 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.

## 10 Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website we encourage you to read the privacy policy of every website you visit.

## 11 Contact us

Our CISO is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions in relation to this Privacy Policy, including any requests to exercise your legal rights (or someone else's legal rights on their behalf), please contact the CISO using the details below.

Chief Information Security Officer  
LIKEZERO Limited  
4th floor,  
WeWork The Monument,  
51 Eastcheap,  
London EC3M 1DT  
United Kingdom

Email: [privacy@likezero.co.uk](mailto:privacy@likezero.co.uk)

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 (Tel: 0303 123 1113 or at [www.ico.org.uk](http://www.ico.org.uk)). Alternatively, you can also make a complaint to the supervisory authority in the Member State of the European Union in which you are resident. We would however appreciate the chance to deal with your concerns before you approach the ICO or a supervisory authority, so please contact us in the first instance.

## 12 Keeping your information up to date

To help LIKEZERO keep accurate information, you must tell us about changes to information or personal details relating to you, in particular, any changes to contact or financial details. If you know that LIKEZERO holds any personal details about you that are out of date or inaccurate, please let us know as soon as possible by contacting us on the details in Section 11 (*Contact us*) above.

## 13 Notification of changes

LIKEZERO may update this Privacy Policy from time to time as our privacy practices change, or as required by applicable legal or regulatory requirements. Where it is practicable, we will notify you of any significant changes. However, the last update date is given at the start of this Privacy Policy, and we encourage you to review this Privacy Policy periodically so you remain informed of how we use your personal data.