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Privacy Policy.

This Privacy Policy sets out how we, Nimbus Hosting Ltd, collect, store and use information about you when you use or interact with our website, www.nimbushosting.co.uk (our website) and where we otherwise obtain or collect information about you. This Privacy Policy is effective from 27th April 2018.

Summary

This section summarises how we obtain, store and use information about you. It is intended to provide a very general overview only. It is not complete in and of itself and it must be read in conjunction with the corresponding full sections of this Privacy Policy.

• Data controller: Suzette Quinn

• How we collect or obtain information about you: o when you provide it to us (e.g. by contacting us, placing an order on our web site and signing up to our newsletter and by requesting a demo of the platform. o from your use of our website, using cookies, and o occasionally from third parties.

• Information we collect: name, contact details, payment information e.g. your credit or debit card details, IP address, information from cookies, information about your computer or device (e.g. device and browser type), information about how you use our website (e.g. which pages you have viewed, the time when you view them and what you clicked on, the geographical location from which you accessed our website (based on your IP address), company name or business name (if applicable) and VAT number (if applicable).

• How we use your information: for administrative and business purposes (particularly to contact you and process orders you place on our website), to improve our business, products and website, to fulfil our contractual obligations, to advertise our goods and services, to analyse your use of our website, and in connection with our legal rights and obligations.

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• Disclosure of your information to third parties: only to the extent necessary to run our business, to our service providers, to fulfil any contracts we enter into with you, where required by law or to enforce our legal rights.

• Do we sell your information to third parties (other than in the course of a business sale or purchase or similar event): No.

• How long we retain your information: for no longer than necessary, taking into account any legal obligations we have (e.g. to maintain records for tax purposes), any other legal basis we have for using your information (e.g. your consent, performance of a contract with you or our legitimate interests as a business). For specific retention periods in relation to certain information which we collect from you, please see the main section below entitled How long we retain your information.

• How we secure your information: using appropriate technical and organisational measures such as storing your information on secure servers, encrypting transfers of data to or from our servers using Secure Sockets Layer (SSL) technology, encrypting payments you make on or via our website using Secure Sockets Layer (SSL) technology, only granting access to your information where necessary.

• Use of cookies and similar technologies: we use cookies and similar information-gathering technologies such as web beacons on our website including essential, functional, analytical and targeting cookies. For more information, please visit our cookies policy here: http://www.nimbushosting.co.uk/docs/cookiepolicy.pdf

• Transfers of your information outside the European Economic Area: in certain circumstances we transfer your information outside of the European Economic Area, including to the following countries: United States of America. Where we do so, we will ensure appropriate safeguards are in place, the third parties we use who transfer your information outside the European Economic Area have self-certified themselves as compliant with theEUU.S. Privacy Shield.

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• Use of automated decision making and profiling: we use automated decision making and/or profiling. This may include Facebook Advertising, Google AdSense tracking which we may use for retargeting and/or online banner advertising.

• Your rights in relation to your information to access your information and to receive information about its use o to have your information corrected and/or completed to have your information deleted to restrict the use of your information o to receive your information in a portable format to object to the use of your information to withdraw your consent to the use of your information to complain to a supervisory authority

• Sensitive personal information: we do not knowingly or intentionally collect what is commonly referred to as 'sensitive personal information'. Please do not submit sensitive personal information about you to us. For more information, please see the main section below entitled Sensitive Personal Information

Our details

The data controller in respect of our website and business is Nimbus Hosting Ltd. (company registration number: 07366355 of Registered Address of 1 Centrus, Mead Lane, Hertford, SG13 7GX. You can contact the data controller by writing to Nimbus Hosting Ltd, 1 Centrus, Mead Lane, Hertford, SG13 7GX or sending an email to privacy@nimbushosting.co.uk. If you have any questions about this Privacy Policy, please contact the data controller.

Information we collect when you visit our website

We collect and use information from website visitors in accordance with this section and the section entitled Disclosure and additional uses of your information.

Web server log information

We use our own servers to host our website. Our website server automatically logs the IP address you use to access our website as well as other information about your visit such as the pages accessed, the date and time of the request, the source of your access to our website (e.g. the website or URL (link) which referred

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you to our website), and your browser version and operating system. Our server is located in the United Kingdom.

Use of website server log information for IT security purposes

We collect(s) and store(s) server logs to ensure network and IT security and so that the server and website remain uncompromised. This includes analysing log files to help identify and prevent unauthorised access to our network, the distribution of malicious code, denial of services attacks and other cyber-attacks, by detecting unusual or suspicious activity.

Legal basis for processing: compliance with a legal obligation to which we are subject (Article 6(1)(c) of the General Data Protection Regulation).

Legal obligation: we have a legal obligation to implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk of our processing of information about individuals. Recording access to our website using server log files is such a measure.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation). Legitimate interests: we have a legitimate interest in using your information for the purposes of ensuring network and information security.

Use of website server log information to analyse website use and improve our website

We use the information collected by our website server logs to analyse how our website users interact with our website and its features. For example, we analyse the number of visits and unique visitors we receive, the time and date of the visit, the location of the visit and the operating system and browser used.

We use the information gathered from the analysis of this information to improve our website. For example, we use the information gathered to change the information, content and structure of our website and individual pages based according to what users are engaging most with and the duration of time spent on particular pages on our website.

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Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: improving our website for our website users and getting to know our website users' preferences so our website can better meet their needs and desires.

Cookies and similar technologies

Cookies are data files which are sent from a website to a browser to record information about users for various purposes.

We use cookies and similar technologies on our website, including essential, functional, analytical and targeting cookies and web beacons. For further information on how we use cookies, please see our cookies policy which is available here: http://www.nimbushosting.co.uk/docs/cookiepolicy.pdf

You can reject some or all of the cookies we use on or via our website by changing your browser settings but doing so can impair your ability to use our website or some or all of its features. For further information about cookies, including how to change your browser settings, please visit www.allaboutcookies.org or see our cookies policy.

Information we collect when you contact us

We collect and use information from individuals who contact us in accordance with this section and the section entitled Disclosure and additional uses of your information.

Email

When you send an email to the email address displayed on our website, we collect your email address and any other information you provide in that email (such as your name, telephone number and the information contained in any signature block in your email).

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Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

Transfer and storage of your information

We use a third party email provider to store emails you send us. Our third party email provider is Google Their privacy policy is available here: https://cloud.google.com/security/gdpr/.

Emails you send us will be stored outside the European Economic Area on our third party email provider's servers in the United States of America. For further information please see the section of this privacy policy entitled Transfers of your information outside the European Economic Area.

Contact form

When you contact us using our contact form, we collect company name, contact name, phone number, email address as well as details of your enquiry.

If you do not provide the mandatory information required by our contact form, you will not be able to submit the contact form and we will not receive your enquiry.

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Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation). Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

Transfer and storage of your information

Messages you send us via our contact form will be stored within and outside the European Economic Area on our email provider's servers and our CRM provider, Freshsales, in the United States of America. Their privacy policies are available here: https://www.freshworks.com/privacy/gdpr/ and https://cloud.google.com/security/gdpr/.

Phone

When you contact us by phone, we collect your phone number and any information provided to us during your conversation with us.

We do not record phone calls.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation) Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

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Reason why necessary to perform a contract: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

Post

If you contact us by post, we will collect any information you provide to us in any postal communications you send us.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation) Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

Information we collect when you interact with our website

We collect and use information from individuals who interact with particular features of our website in accordance with this section and the section entitled Disclosure and additional uses of your information.

E-Newsletter

When you sign up for our e-newsletter on our website or opt to receive news, product updates from us by entering your email address and clicking subscribe or ticking a box at checkout indicating that they would like to receive your e-newsletter.

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Legal basis for processing: your consent (Article 6(1)(a) of the General Data Protection Regulation).

Consent: you give your consent to us sending you our e-newsletter by signing up to receive it using the steps described above.

Transfer and storage of your information

We use a third party service to send out our e-newsletter and administer our mailing list, MailChimp and Ortto. Their privacy policy is available here: https://ortto.com/privacy/ and https://mailchimp.com/legal/privacy/.

Information you submit to subscribe for our e-newsletter will be stored within and outside the European Economic Area on our MailChimp and Ortto servers in the United States of America. For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

Use of web beacons in emails

We use technologies such as web beacons (small graphic files) in the emails we send to allow us to assess the level of engagement our emails receive by measuring information such as the delivery rates, open rates and click through rates, time and date information. We will only use web beacons in our emails if you have consented to us doing so.

For more information on how we use web beacons in our e-newsletter emails, see our cookies policy which is available here: http://www.nimbushosting.co.uk/docs/cookiepolicy.pdf For more information about our third party mailing list provider and they use web beacons, please see their privacy policy which is available here: https://ortto.com/privacy/ and https://mailchimp.com/legal/privacy/.

Registering on our website

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When you register and create an account on our website, we collect the following information: and any other information you provide to us when you complete the registration form, including IP address and email address.

If you do not provide the mandatory information required by the registration form, you will not be able to register or create an account on our website.

Legal basis for processing: necessary to perform a contract or to take steps at your request prior to entering into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: creating an account on our website is necessary to allow you to access the goods and services you have purchased from us.

Transfer and storage of your information

Information you submit to us via the registration form on our website will be stored within the European Economic Area on our servers in the United Kingdom.

For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

Information we collect when you place an order on our website or over the phone.

We collect and use information from individuals who place an order on our website in accordance with this section and the section entitled Disclosure and additional uses of your information.

Information collected when you place an order Mandatory information When you place an order for goods or services on our website, we collect your name, email address, payment address, company name (if applicable) and VAT number (if applicable).

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If you do not provide this information, you will not be able to purchase goods or services from us on our website or enter into a contract with us.

Legal basis for processing: necessary to perform a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: we need the mandatory information collected by our checkout form to establish who the contract is with and to contact you to fulfil our obligations under the contract, including sending you receipts and order confirmations.

Processing your payment

After you place an order on our website you will need to make payment for the goods or services you have ordered. In order to process your payment we use a third party payment processors, including PayPal, Pay360 and WorldPay. Your payment maybe be processed by either provide depending on your choice of payment method.

PayPal, Pay360 or WorldPay collect, use and processes your information, including payment information, in accordance with their privacy policies. You can access their privacy policies via the following link(s):
https://www.paypal.com/en/webapps/mpp/ua/privacy-full,
https://www.pay360.com/about-us/privacy-policy,
https://www.worldpay.com/uk/privacy-policy.

Transfer and storage of your information

PayPal is located in the United States of America. Information relating to the processing of your payment is stored outside the European Economic Area on our third party payment processor's servers in the United States of America.

Pay360 is located in the United Kingdom. Information relating to the processing of your payment is stored within the European Economic Area on our third party payment processor's servers in the United Kingdom.

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WorldPay is located in the United Kingdom. Information relating to the processing of your payment is stored within the European Economic Area on our third party payment processor's servers in the United Kingdom.

For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

Legal basis for processing: necessary to perform a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: to fulfil your contractual obligation to pay for the goods or services you have ordered from us.

Marketing communications

At checkout you will have the option of receiving marketing communications from us.

Our similar goods and services

You can opt-out from receiving marketing communications in relation to our goods and which are similar to those which you purchase from us, by not ticking the marketing communication box on the checkout or by unsubscribing from our email marketing.

We will send you marketing communications in relation to similar goods and services if you do not opt out from receiving them.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: direct marketing and advertising our products and services. Transfer and storage of your information We use a third party service to administer our mailing list, MailChimp and Ortto. Information you submit to subscribe for our e-newsletter will be stored within and outside the European

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Economic Area on our third party mailing list provider's servers in the United States of America and the United Kingdom.

For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

Use of web beacons in emails We use technologies such as web beacons (small graphic files) in the emails we send to allow us to assess the level of engagement our emails receive by measuring information such as the delivery rates, open rates and click through rates time and date which our emails achieve. We will only use web beacons in our emails if you have consented to us doing so. For more information on how we use web beacons in our emails, see our cookies policy which is available here: https://www.nimbushosting.co.uk/docs/cookiepolicy.pdf

For more information about our third party mailing list provider and they use web beacons, please see their privacy policy which is available here: https://ortto.com/terms/ and https://mailchimp.com/legal/privacy/.

Information collected or obtained from third parties

This section sets out how we obtain or collect information about you from third parties.

Information received from third parties

Generally, we do not receive information about you from third parties. The third parties from which we receive information about you will generally include design agencies, digital agencies or affiliates/resellers.

It is also possible that third parties with whom we have had no prior contact may provide us with information about you. Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation). Legitimate interest: enforcing our legal rights and taking steps to enforce our legal rights.

In connection with a legal or potential legal dispute or proceedings

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We may need to use your information if we are involved in a dispute with you or a third party for example, either to resolve the dispute or as part of any mediation, arbitration or court resolution or similar process.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s): resolving disputes and potential disputes. For ongoing compliance with laws, regulations and other legal requirements We will use and process your information in order to comply with legal obligations to which we are subject. For example, we may need to disclose your information pursuant to a court order or subpoena if we receive one or to the National Crime Agency in connection with suspected or potential money laundering matters.

Legal basis for processing: compliance with a legal obligation (Article 6(1)(c) of the General Data Protection Regulation).

Legal obligation(s): legal obligations to disclose information which are part of the laws of England and Wales or if they have been integrated into the United Kingdom's legal framework (for example in the form of an international agreement which the United Kingdom has signed).

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation). Legitimate interest: where the legal obligations are part of the laws of another country and have not been integrated into the United Kingdom's legal framework, we have a legitimate interest in complying with these obligations.

How long we retain your information

This section sets out how long we retain your information. We have set out specific retention periods where possible. Where that has not been possible, we have set out the criteria we use to determine the retention period.

Retention periods

Server log information: we retain information on our server logs for up to 1 year. Order information: when you place an order for goods and services, we retain that

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information for six years following the end of the financial year in which you placed your order, in accordance with our legal obligation to keep records for tax purposes.

Correspondence and enquiries: when you make an enquiry or correspond with us for any reason, whether by email or via our contact form or by phone, we will retain your information for as long as it takes to respond to and resolve your enquiry, and for 6 further months, after which point, we will delete your information. Information we obtain from third parties will generally be your name and contact details but will include any additional information about you which they provide to us.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where a third party has passed on information about you to us (such as your name and email address) in order for us to provide services to you, we will process your information in order to take steps at your request to enter into a contract with you and perform a contract with you (as the case may be).

Legal basis for processing: consent (Article 6(1)(a) of the General Data Protection Regulation).

Consent: where you have asked that a third party to share information about you with us and the purpose of sharing that information is not related to the performance of a contract or services by us to you, we will process your information on the basis of your consent, which you give by asking the third party in question to pass on your information to us.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: where a third party has shared information about you with us and you have not consented to the sharing of that information, we will have a

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legitimate interest in processing that information in certain circumstances. For example, we would have a legitimate interest in processing your information to perform our obligations under a sub-contract with the third party, where the third party has the main contract with you.

Our legitimate interest is the performance of our obligations under our sub-contract. Similarly, third parties may pass on information about you to us if you have infringed or potentially infringed any of our legal rights. In this case, we will have a legitimate interest in processing that information to investigate and pursue any such potential infringement.

Where we receive information about you in error

If we receive information about you from a third party in error and/or we do not have a legal basis for processing that information, we will delete your information.

Information obtained by us from third parties

In certain circumstances (for example, to verify the information we hold about you or obtain missing information we require to provide you with a service) we will obtain information about you from certain publicly accessible sources, both EU and non-EU, such as Companies House, online customer databases, business directories, media publications, social media, and websites (including your own website if you have one).

In certain circumstances will also obtain information about you from private sources, both EU and nonEU.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where you have entered into a contract or requested that we enter into a contract with you, in certain circumstances, we will obtain information about you from public sources in order to enable us to understand your business and provide services to you or services to a sufficient standard.

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For example, we would obtain and/or verify your email address from your website or from a directory where you ask us to send you information by email, but we do not possess the information, or we need to confirm that we have recorded your email address correctly.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: in certain circumstances, we will have a legitimate interest in obtaining information about you from public and private sources.

For example, if you have infringed or we suspect that you have infringed any of our legal rights, we will have a legitimate interest in obtaining and processing information about you from such sources in order to investigate and pursue any suspected or potential infringement.

Our use of automated decision-making and profiling

We use automated decision making and profiling on our website. We do not consider that this has any legal effect on you or similarly significantly affects you.

You have the right to object to our use of automated decision making and profiling described in this section. You can do that by opting-out of cookies and similar technologies in accordance with the method described in the relevant section below. If you do not want us to process your actual IP address (usually the IP address assigned to you by your Internet Service Provider) when you visit our website, you can use a Virtual Private Network (VPN) or a free service such as Tor.

You can find out more about our use of cookies and similar technologies (including the legal basis on which we use them) and how to opt out from them in our cookies policy, which is available here: http://www.nimbushosting.co.uk/docs/cookiepolicy.pdf

Profiling

Profiling is any form of automated processing of your information to evaluate personal aspects about you, in particular to analyse or predict things like your

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performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

Use of profiling for web analytics

Our web analytics service, Google Analytics and FullStory, collects information such as your location (based on your IP address) and your behaviour (based on cookies) when you access our website (such as the pages you visit and what you click on). We will only process information from cookies if you have consented to us setting cookies on your computer in accordance with our cookies policy (http://www.nimbushosting.co.uk/docs/cookiepolicypdf).

Logic involved: by automatically analysing and categorising information such as the location (based on IP address) as well as the behaviour and devices of visitors to our website (using cookies), we are able to gain a better understanding of what our website visitors want (in terms of the content of our website and our products), how to improve our website and how to advertise and market our services to them.

Significance and envisaged consequences: cookies will be used to track and store information about your behaviour and device on our website (unless you have opted out from receiving such cookies by using the method in our cookie policy) and your location will be analysed based on your IP address. We may target advertisements based on the level of interest we receive from certain visitors and their behaviour on our website.

Use of profiling in marketing emails

We use web beacons in our marketing emails to analyse who opens our emails and what links are clicked. We will only process information from the web if you have consented to their use in accordance with our cookies policy (http://www.nimbushosting.co.uk/docs/cookiepolicy.pdf).

Logic involved: by analysing how our email recipients respond to our emails, we are able to improve the content and effectiveness of our emails and gauge who is most interested.

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Significance and envisaged consequences: your behaviour when you open our emails will be tracked using small gif files (web beacons) including open rates, click through rates.

How to object: You can object to this by unsubscribing from our email communications.

Legal basis for processing: legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: analysing the level of engagement and effectiveness of our marketing emails and content

Disclosure and additional uses of your information

This section sets out the circumstances in which will disclose information about you to third parties and any additional purposes for which we use your information.

Disclosure of your information to other third parties

We disclose your information to other third parties in specific circumstances, as set out below.

Providing information to third parties such as Google Inc. and FullStory.com. Google and FullStory.com collects information through our use of Google Analytics on our website. Google uses this information, including IP addresses and information from cookies, for a number of purposes, such as improving its Google Analytics service. Information is shared with Google on an aggregated and anonymised basis. To find out more about what information Google collects, how it uses this information and how to control the information sent to Google, please see the following page: https://www.google.com/policies/privacy/partners/ and FullStory, please see the following page: https://www.fullstory.com/legal/privacy/.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

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Legitimate interest(s): meeting our contractual obligations to Google under our Google Analytics Terms of Service (https://www.google.com/analytics/terms/us.html) You can opt out of Google Analytics by installing the browser plugin here: https://tools.google.com/dlpage/gaoptout or https://www.fullstory.com/optout/.

Transfer and storage of your information

Information collected by Google Analytics is stored outside the European Economic Area on Google's servers in the United States of America.

For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

Sharing your information with third parties, which are either related to or associated with the running of our business, where it is necessary for us to do so. These third parties include our accountants, advisors, and insurers. Further information on each of these third parties is set out below.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: running and managing our business efficiently.

Accountants

We share information with our accountants for tax purposes. For example, we share invoices weissue and receive with our accountants for the purpose of completing tax returns and our end of year accounts. Our accountants are Auria Accountancy (Herts) Ltd. Our accountants are located at Top Floor, Leeside Works, Lawrence Avenue, Stanstead Abbots, Hertfordshire, SG12 8DL.

Advisors

Occasionally, we obtain advice from advisors, such as financial advisors, lawyers and public relations professional. We will share your information with these third

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parties only where it is necessary to enable these third parties to be able to provide us with the relevant advice. Our advisors are insert names of advisors. Our advisors are located in England.

Insurers

We will share your information with our insurers where it is necessary to do so, for example in relation to a claim or potential claim we receive or make or under our general disclosure obligations under our insurance contract with them.

Our insurers are Hiscox. Our insurers are located in England.

Disclosure and use of your information for legal reasons

Indicating possible criminal acts or threats to public security to a competent authority

If we suspect that criminal or potential criminal conduct has been occurred, we will in certain circumstances need to contact an appropriate authority, such as the police. This could be the case,for instance, if we suspect that we fraud or a cyber-crime has been committed or if we receive threats or malicious communications towards us or third parties.

We will generally only need to process your information for this purpose if you were involved or affected by such an incident in some way.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: preventing crime or suspected criminal activity (such as fraud). In connection with the enforcement or potential enforcement our legal rights We will use your information in connection with the enforcement or potential enforcement of our legal rights, including, for example, sharing information with debt collection agencies if you do not pay amounts owed to us when you are contractually obliged to do so. Our legal rights may be contractual (where we have entered into a contract with you) or non-contractual (such as legal rights that we have under copyright law or tort law).

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E-Newsletter: we retain the information you used to sign up for our e-newsletter for as long as you remain subscribed (i.e. you do not unsubscribe) or if we decide to cancel our e-newsletter service, whichever comes earlier.

Criteria for determining retention periods

In any other circumstances, we will retain your information for no longer than necessary, taking into account the following:

• the purpose(s) and use of your information both now and in the future (such as whether it is necessary to continue to store that information in order to continue to perform our obligations under a contract with you or to contact you in the future);

• whether we have any legal obligation to continue to process your information (such as any record-keeping obligations imposed by relevant law or regulation);

• whether we have any legal basis to continue to process your information (such as your consent);

• how valuable your information is (both now and in the future);

• any relevant agreed industry practices on how long information should be retained.

• the levels of risk, cost and liability involved with us continuing to hold the information.

• how hard it is to ensure that the information can be kept up to date and accurate; and

• any relevant surrounding circumstances (such as the nature and status of our relationship with you).

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Transmission of information to us by email

Transmission of information over the internet is not entirely secure, and if you submit any information to us over the internet (whether by email, via our website or any other means), you do so entirely at your own risk.

We cannot be responsible for any costs, expenses, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of your decision to transmit information to us by such means.

Transfers of your information outside the European Economic Area

Your information will be transferred and stored outside the European Economic Area (EEA) in the circumstances set out below. We will also transfer your information outside the EEA or to an international organisation in order to comply with legal obligations to which we are subject (compliance with a court order, for example). Where we are required to do so, we will ensure appropriate safeguards and protections are in place.

Contact form

Information you submit to us via our contact form is transferred outside the EEA and stored on our third party Intercom, Freshsales or Google G-Suite provider's servers.

Country of storage: United States of America. This country is not subject to an adequacy decision by the European Commission.

Safeguard(s) used: our third party providers have self-certified its compliance with the EU-U.S. Privacy Shield.

Email

Information you submit to us by email is transferred outside the EEA and stored on our third party email provider's servers.

Our third party email provider is: Google G-Suite. You can access their privacy policy here: https://cloud.google.com/security/gdpr/.

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Country of storage: United States of America. This country is not subject to an adequacy decision by the European Commission.

Safeguard(s) used: our third party email provider has self-certified its compliance with the EU-U.S. Privacy Shield

E-Newsletter

Information you submit to us when you sign up for our e-newsletter is transferred outside the EEA and stored on our third party mailing list provider's servers.

Our third party mailing list provider is: MailChimp. You can access their privacy policy here: https://mailchimp.com/legal/privacy/

Country of storage: United States of America. This country is not subject to an adequacy decision by the European Commission.

Safeguard(s) used: our third party mailing list provider has self-certified its compliance with the EU-U.S. Privacy Shield.

Google Analytics

Information collected by Google Analytics (your IP address and actions you take in relation to our website) is transferred outside the EEA and stored on Google's servers.

You can access Google's privacy policy here: https://www.google.com/policies/privacy/ Country of storage: United States of America. This country is not subject to an adequacy decision by the European Commission.

Safeguard(s) used: Google has self-certified its compliance with the EU-U.S. Privacy Shield which is available here: https://www.privacyshield.gov/welcome. The EU-U.S. Privacy Shield is an approved certification mechanism under Article 42 of the General Data Protection Regulation, which is permitted under Article 46(2)(f) of the General Data Protection Regulation. You can access the European Commission decision on the adequacy of the EU-U.S.

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Privacy Shield here: http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm

Freshworks

Information you submit to us, is transferred outside the EEA and stored on our Freshworks' servers.

Our CRM provider is: Freshworks.

You can access their privacy policy here: https://www.freshworks.com/privacy/.

Country of storage: United States of America. This country is not subject to an adequacy decision by the European Commission.

Safeguard(s) used: our third party provider has self-certified its compliance with the EU-U.S. Privacy Shield.

Your rights in relation to your information

Subject to certain limitations on certain rights, you have the following rights in relation to your information, which you can exercise by writing to Nimbus Hosting Ltd, 1 Centrus, Mead Lane, Hertford, SG13 7GX or sending an email to privacy@nimbushosting.co.uk:

• to request access to your information and information related to our use and processing of your information;

• to request the correction or deletion of your information;

• to request that we restrict our use of your information;

• to receive information which you have provided to us in a structured, commonly used and machine-readable format (e.g. a CSV file) and the right to have that information transferred to another data controller (including a third party data controller);

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• to object to the processing of your information for certain purposes (for further information, see the section below entitled Your right to object to the processing of your information for certain purposes); and

• to withdraw your consent to our use of your information at any time where we rely on your consent to use or process that information. Please note that if you withdraw your consent, this will not affect the lawfulness of our use and processing of your information on the basis of your consent before the point in time when you withdraw your consent.

• **the right not to be subject to a decision based solely on automated processing, including profiling which produces legal affects concerning you or similarly significantly affects you**

In accordance with Article 77 of the General Data Protection Regulation, you also have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or of an alleged infringement of the General Data Protection Regulation.

For the purposes of the UK, the supervisory authority is the Information Commissioner's Office (ICO), the contact details of which are available here: https://ico.org.uk/global/contact-us/

Further information on your rights in relation to your personal data as an individual The above rights are provided in summary form only and certain limitations apply to many of these rights.

For further information about your rights in relation to your information, including any limitations which apply, please visit the following pages on the ICO's website: •https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulationGDPR/individual-rights/; and

• https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/

You can also find out further information about your rights, as well as information on any limitations which apply to those rights, by reading the underlying

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legislation contained in Articles 12 to 22 and 34 of the General Data Protection Regulation, which is available here: http://ec.europa.eu/justice/dataprotection/reform/files/regulation_oj_en.pdf

Verifying your identity where you request access to your information

Where you request access to your information, we are required by law to use all reasonable measures to verify your identity before doing so.

These measures are designed to protect your information and to reduce the risk of identity fraud, identity theft or general unauthorised access to your information.

How we verify your identity

Where we possess appropriate information about you on file, we will attempt to verify your identity using that information.

If it is not possible to identity you from such information, or if we have insufficient information about you, we may require original or certified copies of certain documentation in order to be able to verify your identity before we are able to provide you with access to your information.

We will be able to confirm the precise information we require to verify your identity in your specific circumstances if and when you make such a request.

Your right to object to the processing of your information for certain purposes

You have the following rights in relation to your information, which you may exercise in the same way as you may exercise by writing to Nimbus Hosting Ltd, 1 Centrus Mead Lane, Hertford, SG13 7GX or sending an email to privacy@nimbushosting.co.uk:

• to object to us using or processing your information where we use or process it in order to carry out a task in the public interest or for our legitimate interests, including 'profiling' (i.e. analysing or predicting your behaviour based on your information) based on any of these purposes; and

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• to object to us using or processing your information for direct marketing purposes (including any profiling we engage in that is related to such direct marketing).

You may also exercise your right to object to us using or processing your information for direct marketing purposes by:

• clicking the unsubscribe link contained at the bottom of any marketing email we send to you and following the instructions which appear in your browser following your clicking on that link.

• sending an email to privacy@nimbushosting.co.uk, asking that we stop sending you marketing communications or by including the words "OPT OUT".

For more information on how to object to our use of information collected from cookies and similar technologies, please see the section entitled How to accept or reject cookies in our cookies policy, which is available here: http://www.nimbushosting.co.uk/docs/cookiepolicy.pdf

Sensitive Personal Information

'Sensitive personal information' is information about an individual that reveals their racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic information, biometric information for the purpose of uniquely identifying an individual, information concerning health or information concerning a natural person's sex life or sexual orientation.

We do not knowingly or intentionally collect sensitive personal information from individuals, and you must not submit sensitive personal information to us.

If, however, you inadvertently or intentionally transmit sensitive personal information to us, you will be considered to have explicitly consented to us processing that sensitive personal information under Article 9(2)(a) of the General Data Protection Regulation. We will use and process your sensitive personal information for the purposes of deleting it.

Changes to our Privacy Policy

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We update and amend our Privacy Policy from time to time.

Minor changes to our Privacy Policy.

Where we make minor changes to our Privacy Policy, we will update our Privacy Policy with a new effective date stated at the beginning of it. Our processing of your information will be governed by the practices set out in that new version of the Privacy Policy from its effective date onwards.

Major changes to our Privacy Policy or the purposes for which we process your information

Where we make major changes to our Privacy Policy or intend to use your information for a new purpose or a different purpose than the purposes for which we originally collected it, we will notify you by email (where possible) or by posting a notice on our website.

We will provide you with the information about the change in question and the purpose and any other relevant information before we use your information for that new purpose.

Wherever required, we will obtain your prior consent before using your information for a purpose that is different from the purposes for which we originally collected it.

Children's Privacy

Because we care about the safety and privacy of children online, we comply with the Children's Online Privacy Protection Act of 1998 (COPPA). COPPA and its accompanying regulations protect the privacy of children using the internet. We do not knowingly contact or collect information from persons under the age of 18. The website is not intended to solicit information of any kind from persons under the age of 18.

It is possible that we could receive information pertaining to persons under the age of 18 by the fraud or deception of a third party. If we are notified of this, as soon as we verify the information, we will, where required by law to do so, immediately obtain the appropriate parental consent to use that information or, if

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we are unable to obtain such parental consent, we will delete the information from our servers. If you would like to notify us of our receipt of information about persons under the age of 18, please do so by sending an email to privacy@nimbushosting.co.uk.

California Do Not Track Disclosures

"Do Not Track" is a privacy preference that users can set in their web browsers. When a user turns on a Do Not Track signal in their browser, the browser sends a message to websites requesting that they do not track the user.

For information about Do Not Track, please visit www.allaboutdnt.org

To opt out of FullStory and Google Analytics please use the following links.
https://www.fullstory.com/optout/

https://tools.google.com/dlpage/gaoptout

For information on how to opt out from tracking technologies used on our website, see our cookies policy which is available here:
https://www.nimbushosting.co.uk/docs/cookiepolicy.pdf