

# Privacy notice

Last updated: 8 March 2024

honeypotdb.com ('Website') is provided by HoneyPotDB ('we'/us/'our'). In doing so, we may be in a position to receive and process personal information relating to you. As the controller of this information, we're providing this Privacy Notice ('Notice') to explain our approach to personal information. This Notice forms part of our Terms and conditions, which govern the use of this Website.

We intend only to process personal information fairly and transparently as required by data protection law including the UK General Data Protection Regulation (UK GDPR). In particular, before obtaining information from you (including through use of cookies) we intend to alert you to this Notice, let you know how we intend to process the information (including through use of cookies) and that we'll only process the information as permitted by law. The UK GDPR also defines certain 'special categories' of personal information that's considered more sensitive. These categories require a higher level of protection, as explained below.

Of course, you may browse parts of this Website without providing any information about yourself and without accepting cookies. In that case, it's unlikely we'll possess and process any information relating to you.

We'll start this Notice by setting out the conditions we must satisfy before processing your data. However, you may wish to start with the table at clause 4, which summarises what we intend to collect, or the table at clause 8.5, which summarises our use of cookies. The Notice also explains some of the security measures we take to protect your personal information, and tells you certain things we will or won't do. You should read this Notice in conjunction with the Terms and conditions.

Sometimes, when you take a new service or product from us, or discuss taking a new service or product but decide against it, we might wish to provide you with further information about similar services or products by email or other written electronic communication. In that situation, we will always give you the opportunity to refuse to receive that further information and if you change your mind please let us know. We'll endeavour to remind you of your right to opt-out on each occasion that we provide such information.

## 1. Identity and contact details

- 1.1 Registered number: 15074385
- 1.2 Registered office: HoneyPotDB Ltd, DiSH MCR, 47 Lloyd St, Manchester, M2 5LE
- 1.3 support@honeypotdb.com

## 2. When we're allowed to collect information from you

We will only collect personal information relating to you if one of the following conditions has been satisfied:

- 2.1 You have clearly told us that you are content for us to collect that information for the particular purpose or purposes that we will have specified.
- 2.2 The processing is necessary for the performance of a contract that we have with you.
- 2.3 The processing is necessary so that we can comply with the law.
- 2.4 The processing is necessary to protect someone's life.
- 2.5 The processing is necessary for the performance of a task that's in the public interest.
- 2.6 The processing is necessary for our or another's legitimate interests - but in this case, we'll balance those interests against your interests.

## 3. How to consent

- 3.1 If we need your consent to collect and use certain information, we'll provide you with the opportunity to tell us that you're happy to provide that information at the point of collecting it.
- 3.2 If at any point in time you change your mind and decide that you want to withdraw your consent, please let us know and we'll endeavour to stop processing your information in the specified manner, or we'll delete your data if there is no continuing reason for possessing it.

3.3 If you don't consent to a particular bit of processing, we'll endeavour to ensure that the Website and our service continue to operate without the need for that information.

#### 4. Information we expect to collect from you

4.1 We envisage collecting the following types of information from you:

Information type	Purpose and related details	Justification
Name(s)	<ul style="list-style-type: none"> <li>We collect this to manage and personalise your account, enable billing and to provide our services.</li> </ul>	<ul style="list-style-type: none"> <li>It's necessary for the performance of a contract with you</li> </ul>
Address(s)	<ul style="list-style-type: none"> <li>We collect this to We collect this to manage and personalise your account, enable billing and to provide our services.</li> </ul>	<ul style="list-style-type: none"> <li>It's necessary for the performance of a contract with you</li> </ul>
Phone number(s)	<ul style="list-style-type: none"> <li>We collect this to We collect this to manage and personalise your account, enable billing and to provide our services.</li> </ul>	<ul style="list-style-type: none"> <li>It's necessary for the performance of a contract with you</li> </ul>
Date of birth	<ul style="list-style-type: none"> <li>We collect this to We collect this to manage and personalise your account, enable billing, provide our services, marketing and to collect usage analytics for our product.</li> </ul>	<ul style="list-style-type: none"> <li>It's necessary for the performance of a contract with you</li> </ul>
Sex/Gender Identity	<ul style="list-style-type: none"> <li>We collect this to We collect this to manage and personalise your account, enable billing, provide our services, marketing and to collect usage analytics for our product.</li> </ul>	<ul style="list-style-type: none"> <li>It's necessary for the performance of a contract with you</li> </ul>
Profile picture(s)	<ul style="list-style-type: none"> <li>We collect this to manage and personalise your account, enable billing and to provide our services.</li> </ul>	<ul style="list-style-type: none"> <li>It's necessary for the performance of a contract with you</li> </ul>
Employment information	<ul style="list-style-type: none"> <li>We collect this to We collect this to manage and personalise your account, enable billing, provide our services, marketing and to collect usage analytics for our product.</li> </ul>	<ul style="list-style-type: none"> <li>It's necessary for the performance of a contract with you</li> </ul>
Payment/Billing Information	<ul style="list-style-type: none"> <li>We collect this to We collect this to We collect this to manage and personalise your account, enable billing and to provide our services.</li> </ul>	<ul style="list-style-type: none"> <li>It's necessary for the performance of a contract with you</li> </ul>

4.2 We may collect personal information about you from a number of sources, including the following:

- a. From you when you agree to take a service or product from us, in which case this may include your contact details, date of birth, how you will pay for the product or service and your bank details.
- b. From you when you contact us with an enquiry or in response to a communication from us, in which case, this may tell us something about how you use our services.
- c. As you interact with this Website, we may automatically collect technical information about your equipment, browsing actions and patterns (such as your 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). We may collect this personal information by using cookies and other similar technologies.
- d. From documents that are available to the public, such as the electoral register.
- e. From third parties to whom you have provided information with your consent to pass it on to other organisations or persons - when we receive such information we will let you know as soon as is reasonably practicable.

4.3 If you refuse to provide information requested, then if that information is necessary for a service we provide to you we may need to stop providing that service.

- 4.4 If at any point you think we've invited you to provide information without explaining why, feel free to object and ask for our reasons.

## 5. Using your personal information

- 5.1 Data protection, privacy and security are important to us, and we shall only use your personal information for specified purposes and shall not keep such personal information longer than is necessary to fulfil these purposes. The following are examples of such purposes. We have also indicated below which UK GDPR justification applies, however it will depend on the circumstances of each case.
- a. To help us to identify you when you contact us. This will normally be necessary for the performance of our contract.
  - b. To help us to identify accounts, services and/or products which you could have from us or selected partners from time to time. We may do this by automatic means using a scoring system, which uses the personal information you've provided and/or any information we hold about you and personal information from third party agencies (including credit reference agencies). We will only use your information for this purpose if you agree to it.
  - c. To help us to administer and to contact you about improved administration of any accounts, services and products we have provided before, do provide now or will or may provide in the future. This will often be necessary, but sometimes the improvements will not be necessary in which case we will ask whether you agree.
  - d. To allow us to carry out marketing analysis and customer profiling (including with transactional information), conduct research, including creating statistical and testing information. This will sometimes require that you consent, but will sometimes be exempt as market research.
  - e. To help to prevent and detect fraud or loss. This will only be done in certain circumstances when we consider it necessary or the law requires it.
  - f. To allow us to contact you by written electronic means (such as email, text or multimedia messages) about products and services offered by us where:
    - i. these products are similar to those you have already purchased from us,
    - ii. you were given the opportunity to opt out of being contacted by us at the time your personal information was originally collected by us and at the time of our subsequent communications with you, and
    - iii. you have not opted out of us contacting you.
  - g. To allow us to contact you in any way (including mail, email, telephone, visit, text or multimedia messages) about products and services offered by us and selected partners where you have expressly consented to us doing so.
  - h. To keep you up to date with our member benefit scheme under which, as part of your membership benefits, we will give you membership information and details of discounts and offers we negotiate from time to time on behalf of our members. We will only do this if you have told us that you would like this benefit.
  - i. We may monitor and record communications with you (including phone conversations and emails) for quality assurance and compliance.
    - i. Before doing that, we will always tell you of our intentions and of the specific purpose in making the recording. Sometimes such recordings will be necessary to comply with the law. Alternatively, sometimes the recording will be necessary for our legitimate interest, but in that case we'll only record the call if our interest outweighs yours. This will depend on all the circumstances, in particular the importance of the information and whether we can obtain the information another way that's less intrusive.
    - ii. If we think the recording would be useful for us but that it's not necessary for our legitimate interest, we'll ask whether you consent to the recording, and will provide an option for you to tell us that you consent. In those situations, if you don't consent, the call will either automatically end or will not be recorded.

- j. When it's required by law, we'll check your details with fraud prevention agencies. If you provide false or inaccurate information and we suspect fraud, we intend to record this.
- 5.2 We will not disclose your personal information to any third party except in accordance with this Notice, and then only in one of the following circumstances:
- a. They will be processing the data on our behalf as a data processor (where we'll be the data controller). In that situation, we'll always have a contract with the data processor as set out in the UK GDPR. This contract provides significant restrictions as to how the data processor operates so that you can be confident your data is protected to the same degree as provided in this Notice.
  - b. Sometimes it might be necessary to share data with another data controller. Before doing that we'll always tell you. Note that if we receive information about you from a third party, then as soon as reasonably practicable afterwards we'll let you know; that's required by the UK GDPR.
  - c. Alternatively, sometimes we might consider it to be in your interest to send your information to a third party. If that's the case, we'll always ask whether you agree before sending.
- 5.3 Where you give us personal information on behalf of someone else, you confirm that you have provided them with the information set out in this Notice and that they have not objected to such use of their personal information.
- 5.4 In connection with any transaction which we enter into with you:
- a. We may carry out one or more fraud prevention checks with licensed fraud prevention agencies.
  - b. We and they may keep a record of the search. Information held about you by these agencies may be linked to records relating to other people living at the same address with whom you are financially linked. These records may also be taken into account in credit and fraud prevention checks. Information from your application and payment details of your account will be recorded with one or more of these agencies and may be shared with other organisations to help make credit and insurance decisions about you and members of your household with whom you are financially linked and for debt collection and fraud prevention. This includes those who have moved house and who have missed payments.
  - c. If you provide false or inaccurate information to us and we suspect fraud, we will record this and may share it with other people and organisations. We, and other credit and insurance organisations, may also use technology to detect and prevent fraud.
  - d. If you need details of those fraud prevention agencies from which we obtain and with which we record information about you, please write to our Data Protection Manager at HoneypotDB, HoneypotDB Ltd, DiSH MCR, 47 Lloyd St, Manchester, M2 5LE.
  - e. We may need to transmit the payment and delivery information provided by you during the order process for the purpose of obtaining authorisation from your bank or from PayPal.
- 5.5 We may allow other people and organisations to use personal information we hold about you in the following circumstances:
- a. If we, or substantially all of our assets, are acquired or are in the process of being acquired by a third party, in which case personal information held by us, about our customers, will be one of the transferred assets.
  - b. If we have been legitimately asked to provide information for legal or regulatory purposes or as part of legal proceedings or prospective legal proceedings.
  - c. We may employ companies and individuals to perform functions on our behalf and we may disclose your personal information to these parties for the purposes set out above, for example, for fulfilling orders, delivering packages, sending postal mail and email, removing repetitive information from customer lists, analysing data, providing marketing assistance, providing search results and links (including paid listings and links) and providing customer service. From time to time, these other people and organisations to whom we may pass your personal information may be outside the European Economic Area. We will take all steps reasonably necessary to ensure that your personal

information is treated securely and in accordance with this Notice and the UK GDPR. We require all third-party service providers processing your personal information for us (as our data processor) to respect the security of your personal data and to treat it in accordance with the law. We do not allow them 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.

## 6. Protecting information

- 6.1 We have strict security measures to protect personal information.
- 6.2 We work to protect the security of your information during transmission by using Secure Sockets Layer (SSL) software to encrypt information you input.
- 6.3 We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of personally identifiable customer information. Our security procedures mean that we may occasionally request proof of identity before we disclose personal information to you.
- 6.4 It is important for you to protect against unauthorised access to your password and to your computer. Be sure to sign off when you finish using a shared computer.

## 7. The internet

- 7.1 If you communicate with us using the internet, we may occasionally email you about our services and products. When you first give us personal information through the Website, we will normally give you the opportunity to say whether you would prefer that we don't contact you by email for that purpose. You can also always send us an email (at the address set out below) at any time if you change your mind.
- 7.2 Please remember that communications over the internet, such as emails and webmails (messages sent through a website), are not secure unless they have been encrypted. Your communications may go through a number of countries before they are delivered - this is the nature of the internet. We cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.

## 8. Cookies and other internet tracking technology

- 8.1 When we provide services, we want to make them easy, useful and reliable. This sometimes involves placing small amounts of information on your computer, which is sent back to us at a later time. These are called 'cookies'. These cookies are listed in the table at clause 8.5. Some websites don't use cookies but use related technology for gaining information about website users such as JavaScript, web beacons (also known as action tags or single-pixel gifs), and other technologies to measure the effectiveness of their ads and to personalise advertising content. Multiple cookies may be found in a single file depending on which browser you use.
- 8.2 Where applicable, this section of the Notice also relates to that technology but the term 'cookie' is used throughout.
- 8.3 Some of these cookies are essential to services you've requested from us, whereas others are used to improve services for you, for example through:
  - a. Letting you navigate between pages efficiently
  - b. Enabling a service to recognise your computer so you don't have to give the same information during one task
  - c. Recognising that you have already given a username and password so you don't need to enter it for every web page requested
  - d. Measuring how many people are using services, so they can be made easier to use and that there is enough capacity to ensure they are fast
- 8.4 To learn more about cookies, you may wish to visit: [www.allaboutcookies.org](http://www.allaboutcookies.org), [www.youronlinechoices.eu](http://www.youronlinechoices.eu) or [www.google.com/policies/technologies/cookies/](http://www.google.com/policies/technologies/cookies/)
- 8.5 This Website uses, or allows use of, the following cookies:

Cookie name	Cookie qualities	Consent needed
Authentication	<ul style="list-style-type: none"> <li>Manages and enables the authentication of users logging in and out of our website to use our product(s).</li> <li>Category 1 - essential</li> <li>First party: we're placing the cookie</li> <li>Session cookie</li> </ul>	No
Google Analytics	<ul style="list-style-type: none"> <li>For the purposes of advertising, marketing, engagement tracking and platform usage tracking.</li> <li>Category 4 - targeting and advertising</li> <li>Third party: another website is placing the cookie</li> <li>Persistent cookie, expiry: 2 years</li> </ul>	Yes

8.6 The distinctions referred to in the above table are as follows:

- a. First party versus third party cookies - we set first party cookies ourselves; third party cookies are set by other entities via our Website.
- b. Session versus persistent cookies - session cookies only persist for the duration of that visit; persistent cookies last for longer.
- c. Categories 1-4 found in the ICC UK Cookie guide, as explained below. Category 1 cookies don't require your consent, though we must still tell you about those cookies. Categories 2-4 do require your specific and informed consent.

Category 1	Strictly necessary	<p>These cookies are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website. Without these cookies services you have asked for, like shopping baskets or e-billing, cannot be provided.</p> <p>We include in this category cookies that are used only for electronic communication. (The ICC doesn't refer to these cookies, but the law is the same.)</p>
Category 2	Performance	<p>These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. This information is only used to improve how a website works.</p>
Category 3	Functionality	<p>These cookies allow the website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. For instance, a website may be able to provide you with local weather reports or traffic news by storing in a cookie the region in which you are currently located. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as a live chat session.</p>
Category 4	Targeting and advertising	<p>These cookies are used to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by advertising networks with the website operator's permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.</p>

8.7 As with any other information we may collect from you, we'll work to protect the security of your information during transmission by using Secure Sockets Layer (SSL) software to encrypt information you input.

8.8 The Website may include third-party advertising and links to third-party websites. We do not provide any personally identifiable customer personal information to these third-party advertisers or third-party websites except where permitted in accordance with this privacy notice, however as to cookies please see above clause 8.

- 8.9 We exclude all liability for loss that you may incur when interacting with this third-party advertising or using these third-party websites.

## 9. Your legal rights

- 9.1 Under certain circumstances, you have rights under data protection laws in relation to your personal information.
- 9.2 You have the right to:
- a. Request access to your personal information (commonly known as a 'data subject access request'). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
  - b. Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected, though we may need to verify the accuracy of the new information you provide to us.
  - c. Request erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we're required to erase your personal information to comply with the law. Note, however, that we may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
  - d. Object to processing of your personal information where we're 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're processing your personal information 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.
  - e. Request restriction of processing of your personal information. This enables you to ask us to suspend the processing of your personal information in the following situations:
    - i. if you want us to establish the information's accuracy;
    - ii. where our use of the information is unlawful but you do not want us to erase it;
    - iii. where you need us to hold the information even if we no longer require it as you need it to establish, exercise or defend legal claims; or
    - iv. you have objected to our use of your information but we need to verify whether we have overriding legitimate grounds to use it.
  - f. Request the transfer of your personal information to you or to a third party. We will provide to you, or a third party you have chosen, your personal information 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.
  - g. Withdraw consent at any time where we're relying on consent to process your personal information. 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.
- 9.3 You will not have to pay a fee to access your personal information (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 may refuse to comply with your request in these circumstances.
- 9.4 We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information 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.

- 9.5 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.

#### **10. Further information**

- 10.1 If you would like any more information or you have any comments about this Notice, or if you wish to exercise any of your legal rights, please either write to us at Data Protection Manager, HoneypotDB, HoneypotDB Ltd, DiSH MCR, 47 Lloyd St, Manchester, M2 5LE, or email us at [support@honeypotdb.com](mailto:support@honeypotdb.com).
- 10.2 Please note that we may have to amend this Notice on occasion, for example if we change the cookies that we use. If we do that, we will publish the amended version on the Website. In that situation we will endeavour to alert you to the change, but it's also your responsibility to check regularly to determine whether this Notice has changed.
- 10.3 You can ask us for a copy of this Notice by writing to the above address or by emailing us at [support@honeypotdb.com](mailto:support@honeypotdb.com). This Notice applies to personal information we hold about individuals. It does not apply to information we hold about companies and other organisations.