# Privacy and Cookies Notice

Last updated: 11/09/2024

Version 1.4

## 1. About this privacy and cookies notice

The websites https://manholemetrics.com and https://porthole.manhole-metrics.com (the Sites) are operated by ManholeMetrics LTD ("we", "us", "our"), We are ManholeMetrics LTD incorporated in England and Wales under company registration number 13524548. Our registered office is at 14 Stanley Gardens, London W11 2NE.

We are committed to protecting your privacy and complying with our data protection obligations under the Data Protection Act 2018 (the **DPA 2018**), the General Data Protection Regulation 2016/679 (the **GDPR**) and any other applicable UK legislation (together, Data Protection Law).

When you interact with us or use the Sites, we act as the data controller of your personal data. This means that we are responsible for processing your personal data and deciding how to use it.

This privacy and cookies notice explains the types of personal data we may collect about you when you interact with us, why we collect it, what we use it for and what rights you have over that data. Personal data is any information about an identifiable person. Processing is anything we do with your personal data, including using, storing, sharing and deleting it.

This notice was last updated on the date shown at the top. We may change this notice at any time by posting an updated version on the Sites and will make reasonable efforts to bring any material changes to your attention. You may wish to check it before using the Sites as any changes will be effective from the date that they are made

## 2. Contact Information

If you have any concerns or would like further information about our use of data or this notice in general, you can contact Will Dubin at *contact@manholemetrics.com*

## 3. What information do we collect?

We collect, store and use the types of personal data set out in the table at the end of this notice.

## 4. How will we use your personal data?

We will use your personal data for the purposes set out in the table at the end of this notice.

## 5. How do we share your personal data?

When we share personal data, we do so in accordance with Data Protection law. We may share certain personal data:

- with parties who provide products or services to us, such as, email services, payment processing, health insurance, payroll etc;
- if the Company or part of the business is sold, transferred or integrated with another business, with our advisers, a prospective purchaser, a prospective purchaser's advisers or the new owner of the Company to facilitate the process;

We may also provide third parties with aggregated but anonymised information and analytics about our customers. Before we do so we will make sure that it does not identify you.

## 6. Use of cookies and similar technologies

We and our third-party service providers use cookies and similar technologies to collect information about, and relevant to, your usage of the Sites. Cookies are small text files that are stored on your computer when you visit the Sites. It is standard practice to use cookies to make your experience better when using a website.

We use the following categories of cookies and similar technologies on this Sites:

- **Strictly necessary cookies**: These cookies are essential to enable you to move around the Sites and use its features. Without these cookies, services you have asked for (such as remembering your login details or the items you placed in your basket) cannot be provided.
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- **Analytics cookies:** These cookies collect information about how you use the Sites, for instance which pages you go to most often, what searches you perform and if you get error messages from web pages. Information these cookies collect can be used to improve how the Sites work.

When you visit the Sites for the first time (and periodically after that), we will request your consent to the setting of all cookies other than strictly necessary cookies. You can delete existing cookies and disable some or all types of cookies in future if you wish.

To disable some or all types of cookies, you will have to change the settings on your browser. If you change your mind, you can enable cookies again at any time. Disabling cookies on your browser may stop the Sites from working properly.

To find out more about cookies please visit *allaboutcookies.org*



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## 7. Third party links

This Sites contain links to other websites over which we have no control. We are not responsible for and do not review or endorse the privacy policies or practices of other sites which you choose to access from these Sites. We encourage you to review the privacy policies of those other sites, so you can understand how they collect, use and share your personal information.

## 8. Your rights

We respect your rights to privacy and will respond to requests for access or control over information about you in accordance with Data Protection Law. We may require you to verify your identity before we take any action.

Depending on the reason we have your personal data, you have a right to:

- access the personal information we hold about you (commonly known as subject access);
- request that we correct or complete personal information we hold about you that is inaccurate or incomplete;
- request that we erase your personal information in some circumstances, or object to our processing it as detailed at section 4;
- restrict how we use your personal information, in certain circumstances;
- request that we provide you with copies of your personal information in a machine-readable format or transfer it across different services; and
- where we have asked for your consent to process your data, to withdraw this consent.

These rights are limited in some situations under Data Protection Law – for example, where we can demonstrate that we are under a legal obligation to process your data.

If you wish to exercise any of these rights, please contact us using the details in section 2.

## 9. Your right to object

You have a right to object to our processing of your personal data and ask us to stop doing so. If we are processing your personal data or direct marketing purposes (which includes profiling to the extent that it is related to such direct marketing) and you object to this, we will stop processing your personal data immediately. If our processing of your personal data is in the public interest or pursuant to our legitimate interests and you object to this, we will stop processing your personal data unless we have compelling reasons which override your interests, or our use of your personal data is for the establishment, exercise or defence of legal claims.

We hope that we can satisfy any queries you may have about the way we process your data. However, if you have unresolved concerns you also have the right to complain to



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data protection authorities (in the UK, the Information Commissioner's Office). You can call the ICO on 0303 123 1113 or go to their website: *https://ico.org.uk/make-a-complaint/*).

## 10. Data retention

Your personal data will only be kept for as long as necessary for our purposes. Specific periods are set out in the table at the end of this notice.

## 11. Data protection

We process your personal data in accordance with the following principles:

- we process your personal data lawfully, fairly and in a transparent way;
- we collect your personal data for specified, explicit and legitimate purposes; any further processing we do is compatible with the original purposes for which for which we collected it;
- we only process personal data which is adequate, relevant and limited to what is necessary to achieve the purpose for which it is processed;
- we take reasonable steps to ensure that all personal data is accurate and kept up to date where necessary;
- we do not store personal data in a form which identifies you for any longer than is necessary for the purposes of processing; and
- we process personal data securely and in a way that protects against unauthorised or unlawful processing, accidental loss, destruction or damage.
    - When we ask for your personal data we will tell you whether you are required by law or contract to provide it, and what will happen if you do not provide the data.
    - Any request for consent to the processing of your personal data will be made directly to you and will include information about why we require the personal data and what will be done with it.

## 12. What is our lawful basis for processing?

We will only process personal data when we have a lawful basis for doing that processing. The table at the end of this notice sets out the lawful basis we rely on for each type of data we process.

We will choose one of the lawful bases in the GDPR to justify how we use your personal data. These are:

- Consent: You have given consent to the processing of your personal data for one or more specific purposes.
- Contract: The processing is necessary for the performance of a contract with you or in order to take steps at your request before entering into a contract.



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- Legal obligation: We need to process your personal data to comply with a legal obligation.
- Vital interests: The processing is necessary to protect the vital interests of you or another person.
- Public interest: Processing is necessary for the performance of a task carried out in the public interest or in the exercise of some official authority.
- Legitimate interests: Processing is necessary for the purposes of legitimate interests pursued by us or someone else, except where such interests are overridden by your interests or fundamental rights and freedoms requiring the protection of your personal data.

## 13. Table of personal information we use

The table below sets out detailed information about our purposes for processing, the basis for processing and the retention period for the personal data.

| **Category of personal data** | **Purpose of processing** | **Lawful basis for processing** | **Retention Period** |
|---|---|---|---|
| Name, contact details, address, immigration status, national insurance number, date of birth | To deliver services, to offer support, and to provide relevant information to our clients or in conjunction with a job application or employment or consultancy | Performance of contract<br>Consent<br>Legal obligation | Six years following the conclusion of a contract or for job applicants, 2 years since obtaining this information via your consent |
| Browser, device, location and site usage information | To improve the Sites and our Services, to protect the Sites against fraud, and to set default options for you, such as language | Performance of contract | Three years since you last accessed the site |
| Information generated in the course of the use of our products and services or application | For internal research and development purposes, and to improve and test the features and functions of our Sites and Services | Performance of contract | Six years following the end of a contract |

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