

OUR PRIVACY POLICY

Teamgenie Limited trading as teamSalient® (“we/us/our”) respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit this website – www.teamsalient.com – (regardless of where you visit it from), or use our services, and tell you about your privacy rights and how the law protects you.

There is a Glossary in section 10 to help you understand the meaning of some of the terms used in this privacy policy.

1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY POLICY

This privacy policy aims to give you information on how we collect and process your personal data through your interactions with us (e.g., engaging with us, making enquiries, or browsing the website).

It is important that you read this privacy policy, together with any other privacy notice or fair processing notice that we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your personal data. This privacy policy supplements the other notices and is not intended to override them.

CONTROLLER

We are Teamgenie Limited trading, a company incorporated and registered in England and Wales under company number 08598084 and with its registered office at St. Alban Tower, Wood Street, London, EC2V 7AF trading as teamSalient®. We are the controller of your personal data and are responsible to you for its protection. We have paid the data protection fee to the Information Commissioner’s Office (ICO).

We have appointed one of our executive directors to be responsible for overseeing our compliance with data protection legislation and to deal with questions in relation to this privacy policy. If you have any such questions about this privacy policy, including any requests to exercise your legal rights (please see section 9 for more information on these), please contact us using the details below.

CONTACT DETAILS

Our full contact details are:

Full name of legal entity: Teamgenie Limited trading as teamSalient®

Contact: Executive Director

Email address: info@teamsalient.com

Postal address: St. Alban Tower, Wood Street, London, EC2V 7AF

Telephone number: Office: +44 (0)203 950 8402 (Office)

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

CHANGES TO THIS PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

While this policy is compliant with the law as it stands at the date of publication, data protection is an area that is subject to frequent consultation and refinement as to perceived best practice. We may therefore have to update this privacy policy from time to time to remain compliant with the law. We will not always inform you of any changes to this policy, so we recommend that you check this document before further interacting with us.

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

THIRD-PARTY LINKS

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow those third parties to collect or share data about you. Save for links to www.teamgenie.com which is a website that is also owned and operated by us, we do not control these third-party websites and are not responsible for their privacy statements. When you leave our website via one of these links, we encourage you to read the privacy notice(s) of the website(s) that you visit.

2. THE PERSONAL DATA THAT WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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

- Identity Data. This is your full name and title.
- Contact Data. This is your postal address, billing address (if different from your postal address) email address and telephone numbers and may also include your job title and professional interests.
- Technical Data. This is 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. This information may be collected via small data files called “cookies” – please see our cookie policy for more information.
- Usage Data. This is information about how you use our website, products and services. This information may also be collected via cookies – again, please see our [cookie policy](#) for more information.
- Marketing and Communications Data. This is your preferences in receiving marketing from us and third parties and your communication preferences.

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

We do not collect any Special Categories of Personal Data (i.e. details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, or provide incomplete or inaccurate data, we may not be able to perform the contract we have, or are trying to enter into, with you. In this case, we may have to cancel the applicable arrangement, but we will notify you if this is the case at the time.

3. HOW WE COLLECT YOUR PERSONAL DATA

We use different methods to collect data from and about you as set out in this section:

- Direct interactions. You may give us your Identity and Contact Data by filling in and submitting forms online, or by otherwise corresponding with us. This includes personal data provided when you:
 - use our services (either in person, via the website or over email/ the telephone);
 - enquire about our services (either in person, via the website or over email/the telephone); or
 - give us some feedback.
- Automated technologies or interactions. As you interact with the website, we may automatically collect Technical and Usage Data. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy for further details.
- Third party sources. We may receive personal data about you from various third parties as set out below:
- Technical and Usage Data from analytics providers (we use Google Analytics – please see sections 5 and 6 below for more information).
- Contact, Identity and Marketing and Communications Data from social media and professional networking websites and applications.

4. HOW WE USE YOUR PERSONAL DATA

We can only use your personal data when the law allows us to – the “lawful bases”. The lawful bases are as follows:

1. The data subject has consented to such use.
2. The use is necessary for the performance of a contract with the data subject.

3. The use is necessary for compliance with a legal obligation that we owe.
4. The use is necessary to protect the vital interests of the data subject or another person.
5. The use is necessary for the performance of a task carried out in the public interest, or in the exercise of official authority.
6. The use is necessary for the purposes of legitimate interests of us or a third party (except where such interests are overridden by your fundamental rights and interests).

For more information on what some of these lawful bases mean, please see the Glossary in section 10. Most commonly, we will use your personal data under the lawful bases identified in 2 and 6 above.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us using the details given above or by using the functionality contained in the emails that we may send.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

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

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

Purpose/Activity	Data Required	Lawful Basis
To register you as a customer	(a) Identity (b) Contact	Performance of a contract

To store your contact information on our customer database.	(a) Identity (b) Contact	Legitimate interests (to enable us to have an accurate record of our customers)
To process and perform our contract with you. This includes managing payments, fees and charges; and collecting money owed	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract (b) Legitimate interests (to recover debts due to us)
To manage our relationship with you. This includes notifying you about changes to our terms or this privacy policy and asking you for feedback	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract (b) Compliance with a legal obligation (c) Legitimate interests (to keep our records updated, to ensure quality control of our products and to study how customers use our products/services)
To administer and protect our business and this website. This includes website troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data	(a) Identity (b) Contact (c) Technical (d) Usage	(a) Legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Compliance with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.	(a) Identity (b) Contact (c) Profile (d) Technical (e) Usage (f) Marketing and Communications	Legitimate interests (to study how our customers use our products and services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Legitimate interests (to define types of customers for our products and services, to keep our website updated and

		relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Profile (d) Technical (e) Usage	Legitimate interests (to develop our products and services and grow our business)

MARKETING AND PROMOTIONS

You may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You may receive marketing communications from us if you have requested information from us or purchased goods or services from us and, in each case, you have not opted out of receiving that marketing.

THIRD PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any company outside of Teamgenie Limited for marketing purposes.

OPTING OUT

You can ask us or third parties to stop sending your marketing messages at any time by contacting us. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a purchase of our products or services or any other transaction or interaction with us.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us using the details given above.

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

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in section 4 above. If any of these organisations are based, or have group or affiliated companies that are based, outside of the European Economic Area, then section 6 below sets out the basis on which your personal data is transferred to them.

- Our professional advisers acting as processors or joint controllers (as necessary) including lawyers, bankers, auditors and insurers based in the United Kingdom who provide professional services to us.
- HM Revenue & Customs, regulators and other public authorities acting as processors or joint controllers (as necessary) based in the United Kingdom who require reporting of processing activities in certain circumstances.
- The teamSalient application is managed by Rhapsody Limited. Rhapsody Limited is incorporated and registered in England and Wales.
- We use the Salesforce CRM to manage our customer database. Salesforce is incorporated and registered in the USA.
- We use the Zapier product to integrate customer data into the Salesforce CRM. Zapier is incorporated and registered in the USA.
- We use a company called MailChimp to operate our marketing communications system. MailChimp is a trading name of The Rocket Science Group LLC d/b/a, which is a company incorporated and registered in the USA.
- Google, Inc, which is a company incorporated and registered in the USA. We use analytics services provided by Google in the management of the website.

- Where your relevant profile settings allow it, we may link up with your social media or professional networking accounts. This includes your LinkedIn profile.
- Other third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We recommend that for the named third parties set out above, you visit their respective websites and read their privacy policies, which will set out in more detail these organisations' own approach to the protection of your personal data and privacy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. All disclosures are subject to the requirements of data protection law and confidentiality and non-disclosure obligations, whether arising under contract, law or professional conduct rules.

6. INTERNATIONAL TRANSFERS

Some of the third parties identified in section 5 above are based outside the European Economic Area (EEA), or have group or affiliated companies based outside of the EEA, so their processing of your personal data may involve a transfer of data outside the EEA.]

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection afforded to it by ensuring that at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).

- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in the EEA. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the US, we may transfer data to them if they are part of the EU-US Privacy Shield framework, which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see European Commission: EU-US Privacy Shield. MailChimp is part of the EU-US Privacy Shield.
- Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. DATA SECURITY

We have put in place appropriate technical and security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed, including firewalls and the use of encryption software. Electronic access to your personal data is password protected. All access, whether to electronic or hard copies, is limited only to those employees, agents, contractors and other third parties who have a business need to know. In the case of third parties, they will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

All our employees are trained in data protection and information security.

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

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

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

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. Please note that even when carrying out this exercise, we may keep certain of your data indefinitely.

By law we have to keep basic information about our customers (including Contact, Identity and Engagement Data) for 6 years after they cease being active customers.

[*Please see our cookie policy for information on the duration of the cookies that are involved in collecting your Technical and Usage Data. *]

After the relevant retention period has expired, we will securely delete or destroy your personal data and ensure that any third parties to whom we may have disclosed your personal data does so too.

In some circumstances you can ask us to delete your data before the relevant retention period has expired – the Right to Erasure. Please see section 9 below for more information. You can always opt-out or withdraw your consent to marketing at any time, which will remove you from our marketing lists but not from our customer database as a whole.

9. YOUR LEGAL RIGHTS

YOUR RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.

- Object to processing of your personal data.
- Request restriction of processing of your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us using the contact details given above.

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

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

TIME LIMIT TO RESPOND

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

10. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive

and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess out legitimate interests against any potential impact on you in respect of specific activities by contacting us using the details given above.

Performance of a Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with legal or regulatory obligations to which we are subject.

YOUR LEGAL RIGHTS

You have the right to:

- Request access to your personal data (commonly known as a “subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you that may be incomplete or inaccurate. Please note that we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons, which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.