

PRIVACY POLICY

Cap-It Issuer Limited is committed to protecting the privacy of the users of www.capit.co.uk and the purchasers of a Cap-It Certificate. This Privacy Policy is designed to help you understand what information is gathered, how it is used, how it is protected, and to assist you in making informed decisions when using this website or purchasing a Cap-It Certificate.

For purposes of this Privacy Policy, the terms "**we**", "**us**", and "**our**" refers to Cap-It Issuer Limited. "**You**" refers to you as a user of this website or purchaser of a Cap-It Certificate.

The "**Website**" refers to www.capit.co.uk.

We may need to update this Privacy Policy from time to time. An up-to-date version of this Privacy Policy will always be available on the Website. If we make any material changes to the Website, we will notify you by posting a notice on the Website or by sending you an updated version to your registered email address.

1 CONSENT

- 1.1 By accessing the Website or using any service provided on the Website, you accept our Privacy Policy and Website Terms of Use, and you consent to our collection, storage, use and disclosure of your personal information as described in this Privacy Policy. Each time you visit the Website, or use any service provided on the Website, and any time you voluntarily provide us with information, including the information we receive during your purchase of a Cap-It Certificate, you agree that you are consenting to our collection, use and disclosure of the information that you provide, as described in this Privacy Policy. Whether or not you register or create any kind of account with us, this Privacy Policy applies to all users of the Website.

2 INFORMATION WE COLLECT

- 2.1 We may collect both "Non-Personal Information" and "Personal Information" about you. "Non-Personal Information" includes information that cannot be used to personally identify you, such as anonymous usage data, general demographic information we may collect, referring/exit pages and URLs, platform types, preferences you submit and preferences that are generated based on the data you submit and number of clicks. "Personal Information" includes information that can be used to personally identify you, such as your name, address and email address.
- 2.2 In addition, we may also track information provided to us by your browser when you view or use the Service, such as the website you came from (known as the "referring URL"), the type of browser you use, the device from which you connected to the Service, the time and date of access, and other information that does not personally identify you. We use this information for, among other things, the operation of the Website, to maintain the quality of the Website, to provide general statistics regarding use of the Website and for other business purposes. We track this information using cookies, or small text files which include an anonymous unique identifier. Cookies are sent to a user's browser from our servers and are stored on the user's computer hard drive. Sending a cookie to a user of the Website's browser enables us to collect Non-Personal Information about that user and keep a record of the user's preferences when utilizing our services, both on an individual and aggregate basis. For more information see our Cookie Policy.

3 HOW WE USE AND SHARE INFORMATION

3.1 Personal Information:

In general, we do not sell, trade, rent or otherwise share your Personal Information with third parties without your consent. We may share your Personal Information with third-party providers who are performing services for us. In general, the third-party providers used by us will only collect, use and disclose your information to the extent necessary to allow them to perform the services they provide for us.

However, certain third-party service providers, such as payment processors, have their own privacy policies in respect of the information that we are required to provide to them in order to use their services. For these third-party service providers, we recommend that you read their privacy policies so that you can understand the way your Personal Information will be handled by such providers.

- 3.2 In addition, we may disclose your Personal Information if required to do so by law or if you violate our Website Terms of Use.

3.3 Non-Personal Information:

In general, we use Non-Personal Information to help us improve the Service and customize the user experience. We also aggregate Non-Personal Information in order to track trends and analyse use patterns of the Service. This Privacy Policy does not limit in any way our use or disclosure of Non-Personal Information and we reserve the right to use and disclose such Non-Personal Information to our partners, advertisers and other third parties at our sole discretion.

4 HOW WE PROTECT INFORMATION

- 4.1 We implement reasonable precautions and follow industry best practices in order to protect your Personal Information and ensure that such Personal Information is not accessed, disclosed, altered or destroyed. However, these measures do not guarantee that your information will not be accessed, disclosed, altered or destroyed by breach of such precautions. By using our Service, you acknowledge that you understand and agree to assume these risks.

5 YOUR RIGHTS REGARDING THE USE OF YOUR PERSONAL INFORMATION

- 5.1 Data protection is governed by the Data Protection Act 2018 ("**DPA**"). It is the UK's implementation of the General Data Protection Regulation ("**GDPR**"). It applies to all information or data about "identifiable living individuals" which is held by us. It is regulated by the Information Commissioner's Office ("**ICO**").
- 5.2 You can access certain personal information we hold about you by visiting your profile in the "Your Account" section of our website. This section of our website is password-protected to safeguard your personal information and as a registered member, you can, at any time, access the Your Account section and update your password. If you need to change any other information in your profile you should contact us at member@capit.co.uk.
- 5.3 Under DPA you have a right:

- (i) To know if data is held about you on a computer system and be able to get a copy and description of that data;
- (ii) To know the purpose(s) for which the data is being processed and who is going to receive the data;
- (iii) To inspect such data and to have it changed if it is incorrect;
- (iv) To ask for compensation if the data held is inaccurate or if unauthorised people have been given access to it;
- (v) To prevent the processing of data that is likely to cause damage or distress; and,
- (vi) To make sure that decisions made against you are not made only based on automatic processing.

5.4 You can make a request for information either verbally or in writing. We strongly recommend you email privacy@capit.ac.uk for any data requests. Also, it can be made to any part of the company (including by social media) and does not have to be to a specific person or contact point.

5.5 The company has a legal responsibility to identify the individual before providing any data. We must respond to the request within thirty (30) days, although this can be extended to two (2) months if the request is particularly complex.

5.6 You do not pay a fee for a request. However, if the request is "manifestly unfounded or excessive", we can charge a "reasonable fee". Under GDPR, we can withhold personal data if disclosing it would "adversely affect the rights and freedoms of others".

5.7 There are several exemptions to the subject access rules. You should consult the ICO website for more information; in particular: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/exemptions/>.

5.8 Cap-It Issuer Limited does not intend to send any marketing or promotional communications directly to members of the Website. If we do, you have the right at any time to prevent us from contacting you for marketing purposes. If we send a promotional communication to a user via email, the user can opt out of further promotional communications by following the unsubscribe instructions provided in each promotional e-mail. Please note that we may continue to send you administrative emails including, for example, periodic updates to our Privacy Policy.

6 LINKS TO OTHER WEBSITES

6.1 We may provide links to or be compatible with other websites or applications. However, we are not responsible for the privacy practices employed by those websites or the information or content they contain. This Privacy Policy applies solely to information collected by us through the Website and during the purchase of a Cap-It Certificate. Therefore, this Privacy Policy does not apply to your use of a third-party website accessed by selecting a link via our website or through any of our social media channels. To the extent that you access or use any service through or on another website or application, then the privacy policy of that other website or application will apply to your access or use of that site or application. We encourage our users to read the privacy statements of other websites before proceeding to use them.

7 AGE OF CONSENT

- 7.1 By using the Website or purchasing a Cap-It Certificate, you represent that you are at least 18 years of age.

8 CHANGES TO OUR PRIVACY POLICY

- 8.1 Cap-It reserves the right to change this Privacy Policy and the Website Terms of Use at any time. If we decide to change this Privacy Policy, we will post these changes on this page so that you are always aware of what information we collect, how we use it, and under what circumstances we disclose it. Any such modifications become effective upon your continued access to and/or use of the Website immediately after we first post the changes on the Website or otherwise provide you with notice of such modifications. It is your sole responsibility to check the Website from time to time to view any such changes to the terms of this Privacy Policy. If you do not agree to any changes you must cease access to the Website. If you have provided your email address to us, you give us permission to email you for the purpose of notification as described in this Privacy Policy.

9 MERGER OR ACQUISITION

- 9.1 In the event Cap-It Issuer Limited undergoes a business transaction such as a merger, acquisition by another company, or sale of all or a portion of our assets, your Personal Information may be among the assets transferred. You acknowledge and consent that such transfers may occur and are permitted by this Privacy Policy, and that any acquirer of assets may continue to process your Personal Information as set forth in this Privacy Policy. If our information practices change at any time in the future, we will post the policy changes here so that you may opt out of the new information practices. We suggest that you check this Privacy Policy periodically if you are concerned about how your information is used.

10 EMAIL COMMUNICATIONS & OPTING OUT

- 10.1 When it is necessary to do so we will send you service-related announcements. Generally, you may not opt-out of these communications, which are not promotional in nature. Based upon the Personal Information that you provide us, we may communicate with you in response to your inquiries or to manage your account. We may also use your Personal Information to send you updates and other promotional communications. If you no longer wish to receive those email updates, you may opt-out of receiving them by following the instructions included in each update or communication.

11 CONTACT US & WITHDRAWING CONSENT

- 11.1 If you have any questions regarding this Privacy Policy or the practices of the Website or wish to withdraw your consent for the continued collection, use or disclosure of your Personal Information, please contact us by sending an email to privacy@capit.co.uk.