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## PRIVACY POLICY

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### **BACKGROUND:**

DisplayNote Technologies Limited understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website [www.displaynote.com](http://www.displaynote.com) and uses our products or service and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Services and. If you do not accept and agree with this Privacy Policy, you must stop using Our Services immediately.

### **1. Definitions and Interpretation**

In this Policy, the following terms shall have the following meanings:

<b>“Account”</b>	means an account required to access and/or use certain areas and features of Our Services;
<b>“Cookies”</b>	means a small text file placed on your computer or device by Our Services when you visit certain parts of Our Services and/or when you use certain features of Our Services. Details of the Cookies used by Our Services are set out in section 13, below;
<b>“Our Services”</b>	means collectively the software products, online services and websites owned and operated by the company.
<b>“personal data”</b>	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Services. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”); and
<b>“We/Us/Our”</b>	Means DisplayNote Technologies Limited, a limited company registered in Northern Ireland under company number NI610261, whose registered address is The Concourse 3 Building, Queens Road, Belfast, Northern Ireland, BT3 9DT, and whose main trading address is The Concourse 3 Building, Queens Road, Belfast, Northern Ireland, BT3 9DT.

### **2. Information About Us**

- 2.1 Our Services is owned and operated by DisplayNote Technologies Limited, a limited company registered in Northern Ireland under company number NI610261, whose registered address is The Concourse 3 Building, Queens Road, Belfast, Northern Ireland, BT3 9DT and whose main trading address is The Concourse 3 Building, Queens Road, Belfast, Northern Ireland, BT3 9DT.
- 2.2 Our VAT number is GB125654319.

### 3. **What Does This Policy Cover?**

This Privacy Policy applies only to your use of Our Services. Our Services may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

### 4. **Your Rights**

4.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:

4.1.1 The right to be informed about Our collection and use of personal data;

4.1.2 The right of access to the personal data We hold about you (see section 12);

4.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 14);

4.1.4 The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 14);

4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;

4.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);

4.1.7 The right to object to Us using your personal data for particular purposes; and

4.1.8 Rights with respect to automated decision making and profiling.

4.2 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 14 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

4.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

### 5. **What Data Do We Collect?**

Depending upon your use of Our Services, We may collect some or all of the following personal data (please also see section 13 on Our use of Cookies and similar technologies):

5.1 name;

5.2 date of birth;

5.3 business/company name

5.4 job title;

5.5 contact information such as email addresses and telephone numbers;

- 5.6 demographic information such as post code, preferences, and interests;
- 5.7 financial information such as credit / debit card numbers;
- 5.8 IP address;
- 5.9 web browser type and version;
- 5.10 operating system;
- 5.11 a list of URLs starting with a referring site, your activity on Our Services, and the site you exit to;

## 6. How Do We Use Your Data?

- 6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 7, below.
- 6.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:
  - 6.2.1 Providing and managing your Account;
  - 6.2.2 Providing and managing your access to Our Services;
  - 6.2.3 Personalising and tailoring your experience on Our Services;
  - 6.2.4 Supplying Our products and services to you (please note that We require your personal data in order to enter into a contract with you);
  - 6.2.5 Personalising and tailoring Our products and services for you;
  - 6.2.6 Replying to emails from you;
  - 6.2.7 Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by clicking on the unsubscribed link within all emails or contacting [privacy@displaynote.com](mailto:privacy@displaynote.com));
  - 6.2.8 Market research;
  - 6.2.9 Analysing your use of Our Services to enable Us to continually improve Our Services and your user experience;
- 6.3 With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email, telephone or post with information, news and offers on Our products and services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.
- 6.4 Third parties (including Mailchimp and HubSpot) whose content appears on Our Services may use third party Cookies, as detailed below in section 13. Please refer to section 13 for more information on controlling Cookies. Please note that We do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.

- 6.5 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.
- 6.6 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):
  - 6.6.1 Personal data that you have submitted and opted into within a website form or marketing mailing list be retained within our marketing mailing lists held in our marketing automation platforms, Mailchimp and HubSpot. By opting into a marketing list, you acknowledge that the information you provide will be transferred to Mailchimp for processing in accordance with their [Privacy Policy](#) and [Terms](#).
  - 6.6.2 By downloading whitepapers and eBooks from our resources page on Our Services and opting into a marketing list, you acknowledge that the information you provide will be transferred to HubSpot for processing in accordance with their [Privacy Policy](#) and [Terms](#).
  - 6.6.3 If you submit a form request to be contacted by our sales team or to book a demo, your personal data will be held within Zoho.com our CRM systems. You acknowledge that the information you provide will be transferred to Zoho.com for processing in accordance with their [Privacy Policy](#) and [Terms](#).
  - 6.6.4 Your data will be held for a minimum of 5 years or more and will be retained unless you choose to unsubscribe from our lists. You can unsubscribe at any time by clicking on the unsubscribe button in all emails from us or sending an email to [privacy@displaynote.com](mailto:privacy@displaynote.com).

## 7. **How and Where Do We Store Your Data?**

- 7.1 We only keep your personal data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it.
- 7.2 Some or all of your data may be stored outside of the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). You are deemed to accept and agree to this by using Our Services and submitting information to Us. If We do store data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR.
- 7.3 Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Services.

## 8. Do We Share Your Data?

- 8.1 We may sometimes contract with third parties to supply services to you on Our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.
- 8.2 We may compile statistics about the use of Our Services including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.
- 8.3 The third-party data processors used by Us and listed below are located outside of the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). Where We transfer any personal data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR including:
- 8.3.1 Mailchimp – is used as our marketing automation platform. By opting into a marketing list, you acknowledge that the information you provide will be transferred to Mailchimp for processing in accordance with their [Privacy Policy](#) and [Terms](#).
- 8.3.2 HubSpot – is used as our second marketing automation platform. By downloading whitepapers and eBooks from our resources page on Our Services and opting into a marketing list, you acknowledge that the information you provide will be transferred to HubSpot for processing in accordance with their [Privacy Policy](#) and [Terms](#).
- 8.3.3 Zoho.com – Zoho CRM is used for our customer relationship management system. If you submit a form request to be contacted by our sales team or to book a demo, your personal data will be held within Zoho.com our CRM systems. You acknowledge that the information you provide will be transferred to Zoho.com for processing in accordance with their [Privacy Policy](#) and [Terms](#).
- 8.4 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

## 9. What Happens If Our Business Changes Hands?

- 9.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.
- 9.2 In the event that any of your data is to be transferred in such a manner, you will

be contacted in advance and informed of the changes. When contacted you will be given the choice to have your data deleted or withheld from the new owner or controller.

## 10. **How Can You Control Your Data?**

- 10.1 In addition to your rights under the GDPR, set out in section 4, when you submit personal data via Our Services, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details to [privacy@displaynote.com](mailto:privacy@displaynote.com) and by managing your Account.
- 10.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

## 11. **Your Right to Withhold Information**

- 11.1 You may access Our Services without providing any data at all. However, to use all features and functions available on Our Services you may be required to submit or allow for the collection of certain data.
- 11.2 You may restrict Our use of Cookies. For more information, see section 13.

## 12. **How Can You Access Your Data?**

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable, and We will provide any and all information in response to your request free of charge. Please contact Us for more details at [privacy@displaynote.com](mailto:privacy@displaynote.com), or using the contact details below in section 14.

## 13. **Our Use of Cookies**

- 13.1 Our Services may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Services and to provide and improve Our products and services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.
- 13.2 By using Our Services you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. Third party Cookies are used on Our Services for website analytics only. For more details, please refer to section 6, above, and to section 13.6 below. These Cookies are not integral to the functioning of Our Services and your use and experience of Our Services will not be impaired by refusing consent to them.
- 13.3 All Cookies used by and on Our Services are used in accordance with current

Cookie Law.

13.4 Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Services may not function fully or as intended.

13.5 The following first party Cookies may be placed on your computer or device:

<b>Name of Cookie</b>	<b>Purpose</b>	<b>Strictly Necessary</b>
SESS#	Preserves users states across page requests	Yes

and the following third-party Cookies may be placed on your computer or device:

<b>Name of Cookie</b>	<b>Provider</b>	<b>Purpose</b>
_cfduid	hs-analytics.net	Used by the content network, Cloudflare, to identify trusted web traffic.
_cfduid	hs-scripts.com	Used by the content network, Cloudflare, to identify trusted web traffic.
_cfduid	Hubspot.com	Used by the content network, Cloudflare, to identify trusted web traffic.
_cfduid	Zopim.com	Used by the content network, Cloudflare, to identify trusted web traffic.
_cfduid	Zopim.io	Used by the content network, Cloudflare, to identify trusted web traffic.
Lang	Cdn.syndication.twimg.com	Remembers the user's selected language version of a website.

- 13.6 Our Services uses analytics services provided by Google Analytics, HubSpot, Zopim, Pubmatic and Casalemedia. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Services is used. This, in turn, enables Us to improve Our Services and the products and services offered through it. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Services, it does enable Us to continually improve Our Services, making it a better and more useful experience for you.
- 13.7 The analytics service(s) used by Our Services use(s) Cookies to gather the required information.
- 13.8 The analytics service(s) used by Our Services use(s) the following Cookies:

<b>Name of Cookie</b>	<b>First / Third Party</b>	<b>Provider</b>	<b>Purpose</b>
_ga	First	Displaynote.com	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.
_gat	First	Displaynote.com	Used by Google Analytics to throttle request rate.
_gid	First	Displaynote.com	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.
AWSALB	Third	Zopim.com	Unclassified
_hssc	First	Displaynote.com	Collects anonymous statistical data related to the user's website visits, such as the number of visits, average time spent on the website, what pages have been loaded. The purpose is the segment the website's users according to factors such as demographic and geographical location, in order to enable media and marketing agencies to structure and understand their target groups to enable customised online advertising.
_hssrc	First	Displaynote.com	Collects anonymous statistical data related to the user's website visits, such as the number of visits, average time spent on the website, what pages have been loaded. The purpose is the segment the website's users according to factors such as demographic and geographical location, in order to enable media and marketing agencies to structure and understand their target groups to enable customised online advertising.

_hstc	First	Displaynote.com	Collects anonymous statistical data related to the user's website visits, such as the number of visits, average time spent on the website, what pages have been loaded. The purpose is the segment the website's users according to factors such as demographic and geographical location, in order to enable media and marketing agencies to structure and understand their target groups to enable customised online advertising.
_ptq.gif	Third	Hubspot.com	Sends data to the marketing platform HubSpot about the visitor's device and behaviour. Tracks the visitor across devices and marketing channels.
_zlcmid	First	Displaynote.com	Preserves users states across page requests.
_hjIncludedInSample	First	Displaynote.com	Determines if the user's navigation should be registered in a certain statistical place holder.
ads/ga-audiences	Third	Google.com	Used by Google AdWords to re-engage visitors that are likely to convert to customers based on the visitor's online behaviour across websites.
Ads/user-lists/#	Third	Google.com	Unclassified
AdServer/Pug	Third	Pubmatic.com	Unclassified
c	Third	Rubicanproject.com	Unclassified
CMDD	Third	Casalemedia.com	Collects anonymous data related to the user's visits to the website, such as the number of visits, average time spent on the website and what pages have been loaded, with the purpose of displaying target ads.

CMID	Third	Casalemedia.com	Collects anonymous data related to the user's visits to the website, such as the number of visits, average time spent on the website and what pages have been loaded, with the purpose of displaying target ads
CMPRO	Third	Casalemdia.com	Unclassified
CMPS	Third	Casalemedia.com	Collects anonymous data related to the user's visits to the website, such as the number of visits, average time spent on the website and what pages have been loaded, with the purpose of displaying target ads.
CMRUM3	Third	Casalemedia.com	Collects anonymous data related to the user's visits to the website, such as the number of visits, average time spent on the website and what pages have been loaded, with the purpose of displaying target ads.
CMSC	Third	Casalemedia.com	Collects anonymous data related to the user's visits to the website, such as the number of visits, average time spent on the website and what pages have been loaded, with the purpose of displaying target ads
CMST	Third	Casalemedia.com	Collects anonymous data related to the user's visits to the website, such as the number of visits, average time spent on the website and what pages have been loaded, with the purpose of displaying target ads

13.9 In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

13.10 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Services more quickly and efficiently including, but not limited to, login and personalisation settings.

13.11 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

**14. Contacting Us**

If you have any questions about Our Services or this Privacy Policy, please contact Us by email at [privacy@displaynote.com](mailto:privacy@displaynote.com), by telephone on 02890 730 480, or by post at The Concourse 3 Building, Queens Road, Belfast, Northern Ireland, BT3 9DT. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 12, above).

**15. Changes to Our Privacy Policy**

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Services and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Services following the alterations. We recommend that you check this page regularly to keep up-to-date.