



Kittiwake Labs Ltd Privacy Policy: 23 February 2020

Kittiwake Labs Ltd is a UK company, established in August 2018, company number 11520217. This privacy policy will explain how our organization uses the personal data we collect from you when you contact us direct, use our website, and take part in our customer surveys.

Topics:

- What data do we collect?
- How do we collect your data?
- How will we use your data?
- How do we store your data?
- What are your data protection rights?
- Cookies
- Privacy policies of other websites
- Changes to our privacy policy
- How to contact us
- How to contact the appropriate authorities

What data do we collect?

Kittiwake Labs Ltd is currently at proof of concept stage and is collecting the following data:

- Personal identification information:
 - ❖ email address - this is collected by us if you provide your email address voluntarily to enable us to enter you in our prize draw for our market survey, or if you contact us directly by email.
 - ❖ Phone number - this is collected by us if you contact us direct and voluntarily provide your phone number.
 - ❖ Your name - this is collected by us if you contact us direct and voluntarily provide your name.
 - ❖ Your organisation name and your role - this is collected by us if you contact us direct and voluntarily provide your organisation name and role.
- Your responses to our Surfing survey (anonymised).

How do we collect your data?



Kittiwake Labs Ltd

You directly provide Kittiwake Labs Ltd with the data we collect. We collect data and process data when you:

- Voluntarily complete a market survey.
- Use or view our website via your browser's cookies.
- Contact us directly by email, phone or mail.

How will we use your data?

Kittiwake Labs Ltd collects data that you voluntarily provide so that we can:

- Place you in a prize draw after completing our market survey.
- Respond to you by email and / or phone.

How do we store your data?

Kittiwake Labs Ltd securely stores your data at Hubspot.com and for surveys on Google Forms (<https://docs.google.com/forms>). Sessions between Kittiwake Labs Ltd and our Hubspot portal are protected with in-transit encryption, advanced TLS (1.0, 1.1, and 1.2) protocols, and 2,048-bit keys. Your data is protected by a Web Application Firewall and network firewall, and Hubspot incorporates security into its software development lifecycle (SDLC). Hubspot bring in 3rd party penetration testing firms 4 times a year to test the HubSpot products and corporate infrastructure.]. For Google Forms, Google use encryption to keep data private while in transit. They regularly review their information collection, storage, and processing practices, including physical security measures, to prevent unauthorized access to their systems. For more info visit: <https://policies.google.com/privacy#infosecurity>

- Email addresses provided by you for entry into customer survey prize draws: Kittiwake Labs Ltd will keep your email address provided by you for entry in survey prize draws until the expiration date of the draw (usually a maximum of a 3 month period). Once this time period has expired, we will delete your data by performing a GDPR-compliant delete in Google Forms and/or HubSpot.
- Email addresses and phone number/s provided by you in direct communication with Kittiwake Labs Ltd: Kittiwake Labs Ltd will retain your email address and phone number/s for a period of 5 years or until you request us to remove your details, whichever comes soonest. Once this time period has expired, we will delete your data by performing a GDPR-compliant delete in HubSpot.
- Your name, organisation name and your role provided by yourself in direct communication with Kittiwake Labs Ltd: Kittiwake Labs Ltd will retain your name, organisation name and your role for a period of 5 years or until you request us to remove your details, whichever comes soonest. Once this time period has expired we will delete your data by performing a GDPR-compliant delete in HubSpot.



Kittiwake Labs Ltd

What are your data protection rights?

Kittiwake Labs Ltd would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

The right to access – You have the right to request Kittiwake Labs Ltd for copies of your personal data. We may charge you a small fee for this service.

The right to rectification – You have the right to request that Kittiwake Labs Ltd correct any information you believe is inaccurate. You also have the right to request Kittiwake Labs Ltd to complete the information you believe is incomplete.

The right to erasure – You have the right to request that Kittiwake Labs Ltd erase your personal data, under certain conditions.

The right to restrict processing – You have the right to request that Kittiwake Labs Ltd restrict the processing of your personal data, under certain conditions.

The right to object to processing – You have the right to object to Kittiwake Labs Ltd's processing of your personal data, under certain conditions.

The right to data portability – You have the right to request that Kittiwake Labs Ltd transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email: info@kittiwakelabs.com

Or write to us: Data Protection Officer, Kittiwake Labs Ltd, Pool Innovation Centre, Redruth, Trevenson Road, TR15 3PL.

Cookies

Kittiwake Labs do not use cookies but if you want any more info about cookies, see the following website:

www.allaboutcookies.org

Privacy policies of other websites

The Kittiwake Labs Ltd website contains limited links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.



Kittiwake Labs Ltd

Changes to our privacy policy

Kittiwake Labs Ltd keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 23 February 2020.

How to contact us

If you have any questions about Kittiwake Labs Ltd's privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

Email us at: info@kittiwakelabs.com

Or write to us at: Data Protection Officer, Kittiwake Labs Ltd, Pool Innovation Centre, Redruth, Trevenson Road, TR15 3PL.

How to contact the appropriate authority

Should you wish to report a complaint or if you feel that Kittiwake Labs Ltd has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office.

<https://ico.org.uk/make-a-complaint/>