



Privacy Policy

www.ulysses.co.uk



1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how Ulysses collects and processes your personal data through your use of our website (www.ulysses.co.uk) or any personal data you may provide when the Customer (as defined in the software licence) signs up to use our Ulysses Risk Management software ("**Software**").

It is important that you read this privacy notice together with any other privacy notice or fair processing notice 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 data. This privacy notice supplements the other notices and is not intended to override them.

Controller

ULYSSES (2000) LIMITED, a company incorporated in England and Wales with company number 03371318, whose registered office is at Station House, North Street, Havant, Hampshire, PO9 1QU is the controller and is responsible for your personal data (collectively referred to as "**Ulysses**", "**we**", "**us**" or "**our**" in this privacy notice).

Our contact details

Our contact details should you wish to contact us in respect of this policy are as follows:

Email address: info@ulysses.co.uk

Postal address: To the Directors, Ulysses (2000) Limited, A7 Endeavour Business Park, Penner Road, Havant, Hampshire, PO9 1QN

Telephone number: 02392 440540

You have the right to make a complaint at any time to the Information Commissioner's Office ("**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 the privacy notice and your duty to inform us of changes

This version was last updated on 6th November 2020 and historic versions can be obtained by contacting 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.

2. The data 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 as follows:

- **Identity Data** includes your first name and last name.
- **Contact Data** includes your email address and telephone number(s).
- **Technical Data** includes [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.
- **Profile Data** includes your username and password, purchases or orders made by you, your preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, Software and ancillary services.

We do not collect any **Special Categories of Personal Data** about you (this includes 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 as part of us licensing the Software to the Customer (including us providing any ancillary services to the Customer), and you fail to provide that data when requested, we may not be able to grant access to our website and/or the Software, or perform any ancillary services to the Customer. In this case, we may have to cancel your account on our website and licence with the Customer to use the Software but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity and Contact Data by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply to set up an account on our website;
 - enquire about using the Software (and any ancillary services we can provide); or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform our obligations under the Software licence we are about to enter into or have entered into with the Customer.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

We will be relying upon our legitimate interest as the legal basis for processing your personal data.

Purpose for which we will use your personal data

Below is a description of all the ways we plan to use your personal data:

- for the purpose of Risk Management and to enable Ulysses to perform its obligations under the Software licence Ulysses is about to enter into, or has entered into, with the Customer so you can use the Software for this purpose;
- to provide additional ancillary support services to the Customer, where requested by the Customer, in respect of the Software which are not included in the Software licence, including any Customer who has purchased a perpetual browse only licence from us;
- where you are no longer a Customer but return to us in the future with an enquiry, to assist us in identifying you to help us to deal with, and respond to, your enquiry effectively and appropriately; and/or
- to grant you access to use our website, including access to our member forums and documentation we may upload onto the website from time to time.

Marketing

We may use your personal data to form a view on what other Software modules and/or ancillary services we think may be of interest to you. We call this marketing.

You may receive marketing communications from us if you have requested information from us on other Software modules and/or ancillary services and you have not opted out of receiving that marketing.

Opting out

You can ask us to stop sending you marketing messages by [contacting us](#) at any time.

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](#).

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 paragraph 4 above:

- accountants who provide accounting services to us; or
- 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 notice.

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.

6. International transfers

We do not transfer your personal data outside the European Economic Area.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

8. Data retention

How long will you use my personal data for?

We will retain your personal data for so long as the Software licence, or a perpetual browse only licence (as the case may be), between Ulysses and the Customer is in place, and for a period of 30 years thereafter for the purposes set out in paragraph 4 (How we use your personal data) above.

In some circumstances you can ask us to delete your data. Please see paragraph 9 (Your legal rights) below for further information.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. A summary of these rights are as follows:

- **Request access** to your personal data (commonly known as a "data 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. This enables you to have any incomplete or inaccurate data we hold about you corrected, though 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:
 - if you want us to establish the data's accuracy;
 - where our use of the data is unlawful but you do not want us to erase it;
 - 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
 - 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.

If you wish to exercise any of the rights set out above, please [contact us](#).

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.