



More Than Now Ltd

Company Number 09877855

First Floor, Telecom House, 125-135 Preston Road, Brighton, BN1 6AF, United Kingdom

29 July 2021

Website Privacy Policy

1 INTRODUCTION

1.1 Important information and who we are

Welcome to More Than Now Ltd's Privacy and Data Protection Policy ("**Privacy Policy**").

At More Than Now Ltd ("**we**", "**us**", or "**our**") we are committed to protecting and respecting your privacy and Personal Data in compliance with the United Kingdom General Data Protection Regulation ("**GDPR**"), the Data Protection Act 2018 and all other mandatory laws and regulations of the United Kingdom.

This Privacy Policy explains how we collect, process and keep your data safe. The Privacy Policy will tell you about your privacy rights, how the law protects you, and inform our employees and staff members of all their obligations and protocols when processing data.

The individuals from which we may gather and use data can include:

- Customers
- Employees/Staff Members

and any other people that the organisation has a relationship with or may need to contact.

This Privacy Policy applies to all our employees and staff members and all Personal Data processed at any time by us.

1.2 Who is Your Data Controller and Data Protection Officer

More Than Now Ltd is your Data Controller and responsible for your Personal Data.

We have appointed a data protection officer ("**DPO**") who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights surrounding your Personal Data please contact the DPO using the details set out below:

Full name: James Elfer

Email address: jameselfer@morethannow.co.uk

Postal address: First Floor, Telecom House, 125-135 Preston Road, Brighton, BN1 6AF, United Kingdom

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.

1.3 Processing Data on Behalf of a Controller and Processors' responsibility to you

In discharging our responsibilities as a Data Controller we have employees who will deal with your data on our behalf (known as "**Processors**"). Therefore, the responsibilities described below may be assigned to an individual, or may be taken to apply to the organisation as a whole. The Data Controller and our Processors have the following responsibilities:

- Ensure that all processing of Personal Data is governed by one of the legal bases laid out in the GDPR (see 2.2 below for more information on those bases);
- Ensure that Processors authorised to process Personal Data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality;
- Implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk associated with the processing of Personal Data;
- Obtain the prior specific or general authorisation of the Controller before engaging another Processor;
- Assist the Controller in the fulfilment of the Controller's obligation to respond to requests for exercising the data subject's rights;
- Make available to the Controller all information necessary to demonstrate compliance with the obligations laid down in the GDPR and allow for and contribute to audits, including inspections, conducted by the Controller or another auditor mandated by the Controller;
- Maintain a record of all categories of processing activities carried out on behalf of a Controller;
- Cooperate, on request, with the supervisory authority in the performance of its tasks;
- Ensure that any person acting under the authority of the Processor who has access to Personal Data does not process Personal Data except on instructions from the Controller;

- Notify the Controller without undue delay after becoming aware of a Personal Data Breach;
- Designate a data protection officer where required by the GDPR, publish their details and communicate them to the supervisory authority; and
- Support the data protection officer in performing their tasks by providing resources necessary to carry out those tasks and access to Personal Data and processing operations, and to maintain their expert knowledge;

2 LEGAL BASIS FOR DATA COLLECTION

2.1 Types of Data / Privacy Policy Scope

“Personal Data” 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 below. Not all of the following types of data will necessarily be collected from you but this is the full scope of data that we collect and when we collect it from you:

We also collect, use and share Aggregated Data such as Social Science Research. Aggregated Data could be derived from your Personal Data but is not considered Personal Data in law as this data will not directly or indirectly reveal your identity. However, 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 may also aggregate data to enable research or analysis so that we can better understand and serve you and others. For example, we may conduct research on your demographics and usage. Although this aggregated data may be based in part on Personal Data, it does not identify you personally. We may share this type of anonymous data with others, including service providers, our affiliates, agents and current and prospective business partners.

For the purposes of our business we also collect what is known under the GDPR as special categories of Personal Data. We collect the following types of special Personal Data:

- **Political Data:** Information about race, or ethnicity, religious beliefs, sexual orientation and political opinions

In order to collect this special kind of data we need enhanced legal justifications beyond the ordinary legal justifications under the GDPR. We explain which justifications we rely on in paragraph 2.2 below.

2.2 The Legal Basis for Collecting That Data

There are a number of justifiable reasons under the GDPR that allow collection and processing of Personal Data. The main avenues we rely on are:

- **“Consent”:** Certain situations allow us to collect your Personal Data, such as when you tick a box that confirms you are happy to receive email newsletters from us, or ‘opt in’ to a service.

- **“Contractual Obligations”**: We may require certain information from you in order to fulfil our contractual obligations and provide you with the promised service.
- **“Legal Compliance”**: We’re required by law to collect and process certain types of data, such as fraudulent activity or other illegal actions.
- **“Legitimate Interest”**: We might need to collect certain information from you to be able to meet our legitimate interests - this covers aspects that can be reasonably expected as part of running our business, that will not have a material impact on your rights, freedom or interests. Examples could be your address, so that we know where to deliver something to, or your name, so that we have a record of who to contact moving forwards.

For the special categories of data that we collect, the enhanced legal justification we rely on is:

- (a) the data subject has given explicit consent to the processing of such Personal Data for one or more specified purposes (**“Explicit Consent”**)
- (b) processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject (**“Necessity”**);

3 HOW WE USE YOUR PERSONAL DATA

3.1 Our Uses

We will only use your Personal Data when the law allows us to. Set out below is a table containing the different types of Personal Data we collect and the lawful basis for processing that data. Please refer to section 2.2 for more information on the lawful basis listed in the table below.

Examples provided in the table below are indicative in nature and the purposes for which we use your data may be broader than described but we will never process your data without a legal basis for doing so and it is for a related purpose. For further inquiries please contact our Data Protection Officer.

3.2 Marketing and Content Updates

You will receive marketing and new content communications from us if you have created an account and chosen to opt into receiving those communications. From time to time we may make suggestions and recommendations to you about goods or services that may be of interest to you.

3.3 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 our Data Protection Officer.

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.

4 YOUR RIGHTS AND HOW YOU ARE PROTECTED BY US

4.1 How Does More Than Now Ltd Protect Customers' Personal Data?

We are concerned with keeping your data secure and protecting it from inappropriate disclosure. We implement a variety of security measures to ensure the security of your Personal Data on our systems, including Data Minimisation: We follow the UK-GDPR principles, and as such will always seek to minimise the data requested within the confines of project needs. Personal Information/Data: MoreThanNow's policy is not to request personally identifiable information unless absolutely necessary. Secure Data Storage: MoreThanNow stores project on a Microsoft Office 365 Sharepoint drive. Sharepoint uses encryption of data both at rest and in transit between data centres and users, and End User Pseudonymous Information (EUPI) is hashed following FIPS140-2 requirements. MoreThanNow stores data in purpose-specific folders, and restricts access to these folders to members of staff directly involved. We do not keep hard copy back-ups of any data. The cloud offering location is the United Kingdom, and data will not leave the EEA. Data Usage: We download data for analysis onto encrypted devices via Microsoft BitLocker, with up-to-date network security software via BitDefender. Data Retention: MoreThanNow's policy is to store data for 2 years after the date of transfer unless agreed otherwise. If you would like us to remove your data, please let us know at experiment@morethannow.co.uk. Escalation: Any issues, concerns, or questions should be raised with MoreThanNow's Founder and CEO, James Elfer (jameselfer@morethannow.co.uk). Any Personal Data collected by us is only accessible by a limited number of employees who have special access rights to such systems and are bound by obligations of confidentiality. If and when we use subcontractors to store your data, we will not relinquish control of your Personal Data or expose it to security risks that would not have arisen had the data remained in our possession. However, unfortunately no transmission of data over the internet is guaranteed to be completely secure. It may be possible for third parties not under the control of More Than Now Ltd to intercept or access transmissions or private communications unlawfully. While we strive to protect your Personal Data, we cannot ensure or warrant the security of any Personal Data you transmit to us. Any such transmission is done at your own risk. If you believe that your interaction with us is no longer secure, please contact us.

4.2 Opting Out Of Marketing Promotions

You can ask us to stop sending you marketing messages at any time by clicking the unsubscribe button included on all marketing communications..

Where you opt out of receiving these marketing messages, we will continue to retain other Personal Data provided to us as a result of interactions with us not related to your marketing preferences.

4.3 How to Request your Data and the Process for Obtaining it

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, if your request is clearly unfounded, we could refuse to comply with your request.

We may need to request specific information from you to help us confirm your identity and ensure you have the 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.

5 YOUR DATA AND THIRD PARTIES

5.1 Will We Share Your Data With Third Parties?

We may share non-Personal Data with third parties. We may share your Personal Data with subcontractors (only when necessary and with your consent) or affiliates (subject to confidentiality obligations to use it only for the purposes for which we disclose it to them and pursuant to our instructions).

We may also share Personal Data with interested parties in the event that More Than Now Ltd anticipates a change in control or the acquisition of all or part of our business or assets or with interested parties in connection with the licensing of our technology.

If More Than Now Ltd is sold or makes a sale or transfer, we may, in our sole discretion, transfer, sell or assign your Personal Data to a third party as part of or in connection with that transaction. Upon such transfer, the Privacy Policy of the acquiring entity may govern the further use of your Personal Data. In all other situations your data will still remain protected in accordance with this Privacy Policy (as amended from time to time).

We may share your Personal Data at any time if required for legal reasons or in order to enforce our terms or this Privacy Policy.

6 HOW LONG WILL WE RETAIN YOUR DATA FOR?

We will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for. We may retain your Personal Data for a longer period than usual in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

7 AGE LIMIT FOR OUR USERS

You must not use More Than Now Ltd unless you are aged 18 or older. If you are under 18 and you access More Than Now Ltd by lying about your age, you must immediately stop using More Than Now Ltd.

This website is not intended for children and we do not knowingly collect data relating to children.

8 INTERNATIONAL TRANSFER OF DATA

Your information may be stored and processed in the US or other countries or jurisdictions outside the US where More Than Now Ltd has facilities. We are currently storing data in the EU and so, by

using More Than Now Ltd, you are permitting and consenting to the transfer of information, including Personal Data, outside of the US.

9 NOTIFICATION OF CHANGES AND ACCEPTANCE OF POLICY

We keep our Privacy Policy under review and will place any updates on this webpage. This version is dated 29 July 2021. By using More Than Now Ltd, you consent to the collection and use of data by us as set out in this Privacy Policy. Continued access or use of More Than Now Ltd will constitute your express acceptance of any modifications to this Privacy Policy.

10 INTERPRETATION

All uses of the word "including" mean "including but not limited to" and the enumerated examples are not intended to in any way limit the term which they serve to illustrate. Any email addresses set out in this policy may be used solely for the purpose for which they are stated to be provided, and any unrelated correspondence will be ignored. Unless otherwise required by law, we reserve the right to not respond to emails, even if they relate to a legitimate subject matter for which we have provided an email address. As a matter of common sense, you are more likely to get a reply if your request or question is polite, reasonable and there is no relatively obvious other way to deal with or answer your concern or question (e.g. FAQs, other areas of our website etc.).

Our staff are not authorised to contract on behalf of More Than Now Ltd, waive rights or make representations (whether contractual or otherwise). If anything contained in an email from a More Than Now Ltd address contradicts anything in this policy, our terms or any official public announcement on our website, or is inconsistent with or amounts to a waiver of any More Than Now Ltd rights, the email content will be read down to grant precedence to the latter. The only exception to this is genuine correspondence expressed to be from the More Than Now Ltd legal department.