



# POLICY: SMS518 Privacy

REVISION RECORD				
REV	DATE	DESCRIPTION OF REVISION	PREPARED BY	AUTHORISED BY
C	07-10-2024	Full review and template update	Andy Oakes	Shaun Tolfree

## POLICY STATEMENT

Thank you for choosing to be part of our community at Sanctus Limited (“company”, “we”, “us”, or “our”). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us at [info@sanctusltd.co.uk](mailto:info@sanctusltd.co.uk).

When you visit our website [www.sanctusltd.com] and use our services, you trust us with your personal information. We take your privacy very seriously. In this privacy notice, we describe our privacy policy. We seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important.

This privacy policy applies to all information collected through our website or our Social Media (LinkedIn, Twitter & Facebook) and/or any related services, sales, marketing or events (we refer to them collectively in this privacy policy as the “Sites”).

### WHAT INFORMATION DO WE COLLECT?

#### Personal information you disclose to us

We collect personal information that you voluntarily provide to us when expressing an interest in obtaining information about us or our services, when participating in activities on the Sites (such as posting messages on our social media pages) or otherwise contacting us.



The personal information that we collect depends on the context of your interactions with us and the Sites, the choices you make and the features you use. The personal information we COLLECT can include the following:

**Name and Contact Data.** We collect your first and last name, email address, postal address, phone number, and other similar contact data.

**Social Media Login Data.** If you choose to contact us through social media we will collect the Information described in the section called "Social Logins" below.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

#### **Information collected from other Sources**

We may obtain information about you from other sources, such as public databases, joint marketing partners, social media platforms, as well as from other third parties. Examples of the information we receive from other sources include: social media profile information (your name, gender, birthday, email, current city and country, user identification numbers for your contacts, profile picture URL and any other information that you choose to make public).

#### **HOW DO WE USE YOUR INFORMATION?**

We use personal information collected via our Sites for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests ("Business Purposes"), in order to enter into or perform a contract with you ("Contractual"), with your consent ("Consent"), and/or for compliance with our legal obligations ("Legal Reasons"). We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- **To send you marketing and promotional communications** for Business Purposes. You can opt-out of our marketing emails at any time.
- **To send administrative information to you** for Business Purposes, Legal Reasons and/or possibly Contractual. We may use your personal information to send you service and new feature information and/or information about changes to our terms, conditions, and policies.
- **Request Feedback** for our Business Purposes. We may use your information to request feedback and to contact you about your use of our Sites.

**To protect our Sites** for Business Purposes and/or Legal Reasons. We may use your information as part of our efforts to keep our Sites safe and secure (for example, for fraud monitoring and prevention).



- **To enable user-to-user communications** with your consent. We may use your information in order to enable user-to-user communications with each user's consent.
- **To respond to legal requests and prevent harm** for Legal Reasons. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- **For other Business Purposes.** We may use your information for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Sites, services, marketing and your experience.

## WILL YOUR INFORMATION BE SHARED WITH ANYONE?

We only share and disclose your information in the following situations:

- **Compliance with Laws.** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests and Legal Rights.** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.
- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy policy. Affiliates include our sister companies Sanctus Training Limited and Kingsthorpe Limited.
- **With your Consent.** We may disclose your personal information for any other purpose with your consent.
- **Other Users.** When you share personal information (for example, by posting comments, contributions or other content to the Sites, such personal information may be viewed by all users and may be publicly distributed outside the Site and our App in perpetuity. If you interact with other users of our Sites and register through a social network such as LinkedIn, your contacts on the social network will see your name, profile photo, and descriptions of your activity. Similarly, other users will be able to view descriptions of your activity, communicate with you within our Sites, and view your profile.



## **HOW DO WE HANDLE YOUR SOCIAL LOGINS?**

Where you choose to contact us through social media sites, we can view certain profile information. The profile Information we receive may vary depending on the social media provider concerned, but will often include your name, e-mail address, friends list, profile picture as well as other information you choose to make public.

Please note that we do not control, and are not responsible for, other uses of your personal information by your third party social media provider. We recommend that you review their privacy policy to understand how they collect, use and share your personal information, and how you can set your privacy preferences on their sites and apps.

## **HOW LONG DO WE KEEP YOUR INFORMATION?**

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this policy will require us keeping your personal information for longer than 2 years past the termination of your active works with us.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **HOW DO WE KEEP YOUR INFORMATION SAFE?**

We have implemented appropriate technical and organisational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Sites is at your own risk. You should only access the services within a secure environment.

## **WHAT ARE YOUR PRIVACY RIGHTS?**

You have the right to withdraw your consent to your information at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal.



**Opting out of email marketing:** You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list. You can also opt-out by contacting us using the contact information provided below.

If you have questions or comments about this policy, email us at [info@sanctusltd.co.uk](mailto:info@sanctusltd.co.uk)

Reviewed & Signed, for and on behalf of  
Sanctus Ltd:

A handwritten signature in blue ink, appearing to read "Shaun", written in a cursive style.

Shaun Tolfree – 07/10/24