

# **Privacy Policy**

## **Introduction**

Reality Zero One Limited is committed to protecting the privacy and security of your personal information.

This privacy policy describes how we collect and use personal information about you during and after your relationship with us, in accordance with the applicable data protection legislation (the General Data Protection Regulations (GDPR)).

Reality Zero One Limited is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy policy.

It is important that you read this privacy policy when we are collecting or processing personal information about you so that you are aware of how and why we are using such information.

## **Data protection principles**

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

## **The type of information we collect**

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).

There are special categories of more sensitive personal data which require a higher level of protection.

We may collect, store and use the following categories of personal information about you:

1. Personal contact details such as name, title, company name and personal email addresses.
2. Your communication preferences.

## **How your information is collected**

We will collect information through the information you give to us. This may be by using the website or by contacting us directly.

## **How we will use your information and the legal basis for processing your information**

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

1. To perform the services that you have requested from us or in order to take steps at your request prior to undertaking the services requested.
2. To comply with a legal obligation.
3. Where it is necessary for our legitimate interests and your interests and the fundamental rights do not override those interests.
4. Where you have consented to the processing.

We may also use your personal information where we need to protect your interests.

### **Situations in which we will use your information**

We need all categories of information in the list above (see: the type of information we collect) primarily to allow us to perform the services for you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own, provided your interests and fundamental rights do not override those interests. The situations in which we will process your information are listed below:

1. To provide you with information and services that you request from us.
2. To provide and maintain the user platform.
3. To notify you about changes to the user platform.
4. To provide customer care and support.
5. To provide analysis or valuable information so that we can improve the user platform.
6. To monitor the usage of the user platform.
7. To detect, prevent and address technical issues.

### **Failure to provide information**

If you fail to provide certain information when requested, we may not be able to perform the services or to respond to any enquiries.

### **Change of purpose**

We will only use your personal information 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 we need to use your information 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 information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **Data sharing**

We may have to share your personal information with third parties, including third-party service providers.

We require third parties to respect the security of your personal information and to treat it in accordance with the law.

We may transfer or store your personal information on computers located outside of the EU. We will take all reasonably necessary steps to ensure that your personal information is treated securely and in accordance with this privacy policy and that no transfer of your personal information will take place

to an organisation or a country unless there are adequate controls in place including the security of your data and personal information.

## **Data Security**

We have put in place measures to protect the security of your information.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidential and to keep it secure.

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

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

## **Data retention**

We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements. Where you have consented to receive marketing from us we will keep your contact details indefinitely unless you withdraw your consent.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

## **Your rights**

Under certain circumstances, by law you have the right to:

1. **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are processing it lawfully.
2. **Request correction** of the personal information we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
3. **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing.
4. **Object to processing** of your personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

5. **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
6. **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data or request that we transfer a copy of your personal information to another party please contact us in writing.

#### **No fee usually required**

You will not have to pay a fee to access your personal information, however we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively we may refuse to comply with the request in such circumstances.

#### **Contact us**

If you have any questions about the privacy policy please contact us at [[support@reality01.com](mailto:support@reality01.com)].

#### **Changes to this privacy policy**

We reserve the right to update this privacy notice at any time and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

#### **[Internet cookies**

We use cookies on this website to provide you with a better user experience. We do this by placing a small text file on your device/computer hard drive to track how you use the website, to record or log whether you have seen particular messages that we display, to keep you logged into the website where applicable, to display relevant adverts or content, refer you to a third party website.

Some cookies are required to enjoy and use the full functionality of this website.

We use a cookie control system which allows you to accept the use of cookies, and control which cookies are saved to your device/computer. Your web browser should provide you with the controls to manage and delete cookies from your device, please see your web browser options.]