

The term 'Blackdot Solutions Ltd' or 'us' or 'we' refers to the owner of the website whose registered office is:

Viola House  
Maris Lane  
Cambridge  
CB2 9LG

Our company registration number is 07617704. The term 'you' refers to the user or viewer of our website.

This privacy policy explains how we, Blackdot Solutions Ltd, use any personal information we collect about you when you use this website.

## 1. Introduction

Welcome to the website of Blackdot Solutions Ltd ("Blackdot", "us", "we" or "our"). This website is operated by Blackdot and has been created to provide information about our company, including its products and services (together with the website, the "Services"). This privacy policy ("Privacy Policy") sets forth Blackdot's policy with respect to how it collects and uses personal data of any individual that uses our Services and/or which we collect to improve and manage these Services, in accordance with applicable data protection legislation.

## 2. Controller responsible for personal data we process

For the purposes of data protection legislation in the United Kingdom and the European Economic Area ("EEA"), Blackdot, whose registered office is: Viola House, Maris Lane, Cambridge, CB2 9LG United Kingdom, is the controller of your personal data. This means that we determine the purposes for, and ways in which, we collect and use personal data in accordance with applicable data protection legislation, such as the UK Data Protection Act 2018 or the EU General Data Protection Regulation 2016/679, as applicable.

Please note that when we process personal data on behalf of our customers, we are a processor under EEA and United Kingdom data protection laws, and for that reason this Privacy Policy does not govern how we process such data

## 3. What personal data we collect

When individuals interact with our Services, we may collect personal data as further described below:

- **Personal data that you provide through the Services:** we collect personal data from individuals when they voluntarily provide such information, such as when they contact us with

enquiries, when they register with us, book a demo to see Videris in action, place an order for our products or services, or when individuals voluntarily complete customer surveys and provide feedback.

- **Communications with us in relation to transactions in connection with our Services:** we collect personal data from individuals in connection with transactions carried out between customers, including customer representatives, and us.
- **Communication via our website:** we collect Personal Data when you provide it to us through communications via our website. This includes as you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this Personal Data by using cookies and other similar technologies. For further details please see our Cookies Policy.
- **Marketing:** we collect contact email addresses when an individual chooses to subscribe with Blackdot and get the latest news and insights in respect of Blackdot's Services. Please see further information in the "Marketing" section below.
- **When you provide services to us:** when you engage with us to provide us with services we may collect certain details in respect of you or other representatives of your business.

The personal data we collect may include: personal details (such as full name, gender, date of birth, nationality); contact details (such as, email address, physical address, location, telephone number); employment details (such as, company, job title); information contained in correspondence; technical details (such as, IP address, system operating device, username).

When we carry out testing to improve the quality of our Services, plan and develop new product functionality, develop content for the purposes of producing demonstrations for our products or carry out training in respect of our Services, we may also access certain publicly available personal data (such as name, gender, date of birth, nationality, geolocation details, relationship status, directorship details, criminal activity records and political exposure, to the extent any of these are in the public

domain) from third party sources, such as search engines, corporate records databases, adverse media / sanctions / PEP databases, social network platforms, and caller ID / domain / IP address / DNS databases (together "Live Internet Searches"). We may access certain personal data from third party sources such as social network platforms (such as Google, Bing, Yahoo, Startpage, DuckDuckGo, OpenCNAM, Bureau van Dijk, OpenCorporates, ICIJ, OCCRP, Companies House, Refinitiv World-Check One, Dow Jones Factiva, WhoisXML, Hexillion, Facebook, Twitter, Instagram, VKontakte, LinkedIn, ShadowDragon SocialNet) when we do we may have access to your social media details (such as name, gender, date of birth, nationality, geolocation details, relationship status, directorship details) (together "Live Internet Searches").

#### 4. How will we use the information about you?

Under applicable data protection laws, we are required to specify the legal basis under which we are allowed to process certain personal data we process. Generally, we may process personal data to perform a contract, for the establishment, exercise or defence of legal claims or proceedings, to comply with our legal and regulatory obligations, or for our legitimate interests.

We may use personal data we collect as follows:

- to administer the website;
- to enable us to carry out our obligations arising from an engagement or to take steps to enter into an agreement;
- to manage accounts;
- to enable us to respond to an enquiry or other request via our Services or directly and to improve the quality of our communications and interactions with our visitors;
- to notify about changes to our Services;
- to carry out testing to improve the quality of our Services;
- to plan and develop new product functionality;
- to develop content for the purposes of producing demonstrations for our products;
- to carry out training in respect of our Services both internally and for prospective and/or existing customers;
- to protect the security of and managing access to our premises, IT and communication systems, online platforms, website and other systems, preventing and detecting security threats, fraud or other criminal or malicious activities;
- to comply with our legal and regulatory obligations and requests, including reporting to and/or being audited or investigated by national and international regulatory bodies;
- to comply with court orders and to exercise and/or defend our legal rights;
- to understand how you visit our website, how you interact with us and to enrich you user experience by personalising the website;
- to email information about other products and services which we think may be of interest to the recipient.

## 5. Marketing

We may send information about products and services of ours which may be of interest to you, by email. Where required, we will obtain your consent before we send marketing communications to you.

You have a right at any time to opt out of receiving marketing communications by following the details to unsubscribe in each email or by contacting us at [enquiries@blackdotsolutions.com](mailto:enquiries@blackdotsolutions.com)

## 6. Our disclosure of personal data

There are certain circumstances in which we may share personal data we collect with certain third parties without further notice to you, as set forth below:

- **Business transfers:** as we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganisation, dissolution or similar event, personal data may be part of the transferred assets.
- **Agents, consultants and related third parties:** Blackdot, like many businesses, sometimes hires other companies to perform certain business-related functions. Examples of such functions include mailing information, marketing services, email hosting providers, maintaining databases, data integration partners and hosting and cloud computing services. When we employ another

entity to perform a function of this nature, we only provide them with the information that they need to perform their specific function.

- **Legal requirements:** Blackdot may disclose personal data if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, (ii) protect and defend the rights or property of Blackdot, (iii) act in urgent circumstances to protect the personal safety of users of the Services or the public, or (iv) protect against legal liability.
- **Prospective customers:** we may share personal data with prospective customers for the purposes of providing a demo of our Videris product. Such personal data will be limited to Live Internet Searches data (as defined above).

## 7. Data transfers

Blackdot is based in the United Kingdom and therefore Blackdot will process all personal data in this location. In addition, we use service providers, such as email hosting providers and cloud computing and hosting services, who may have access to personal data outside the European Economic Area (“EEA”) and/or the United Kingdom in third countries such as, Australia, India, Singapore and/or the United States. These jurisdictions may have data protection laws which are less adequate than data protection laws within the EEA and/or the United Kingdom.

If personal data is transferred outside the EEA or the United Kingdom, we will ensure appropriate safeguards are in place to safeguard personal data in line with EEA and United Kingdom data protection laws, including ensuring the recipient country has received a positive finding of adequacy from the European Commission or, where required, implementing appropriate safeguards such as European Commission approved standard contractual clauses. If you have any questions please contact us using the details provided below in the “How to contact us” section.

## 8. Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of

harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## 9. Your rights

The following rights may be exercised in respect of the personal data Blackdot processes:

- **Right of access:** if asked by the relevant individual, we will confirm whether we are processing personal data and, if so, provide a copy of that personal data along with certain other details. If additional copies are required, we may need to charge a reasonable fee.
- **Right to correct or request deletion:** individuals may ask us to correct, delete or remove their personal data.
- **Right to object to or restrict processing:** individuals may object to the processing of their personal data and. Individuals may also ask us to restrict or 'block' the processing of their personal data in certain circumstances, such as where they contest its accuracy or object to us processing it. If these rights are exercised, we will consider these requests in accordance with our legal obligations.

- **Right to data portability:** individuals have the right to receive personal data in a structured, commonly used and machine-readable format and (if certain conditions are satisfied), transmit that personal data to a third party, if we have the technical means.
- **Right to lodge a complaint with the data protection authority:** if an individual has a concern about our privacy practices, including the way we handled personal data in relation to this Privacy Policy, they can report it to their local data protection authority. We hope anyone will be able to address any concerns with us directly in the first instance so we are able to respond to them.

You may exercise your rights under applicable data protection laws by contacting us as indicated under the "How to contact us" section below.

## 10. Children

Blackdot does not knowingly collect personal data from children under the age of 16. If you have reason to believe that a child under the age of 16 has provided personal data to Blackdot through the Services, please contact us, and we will endeavor to delete that information from our databases.

## 11. Other websites

Our website contains links to other websites. This Privacy Policy only applies to our Services, which includes this website. So when you link to other websites you should read their own privacy policies.

## 12. Changes to our Privacy Policy

We keep our privacy policy under regular review, and we will place any updates on this web page.

This privacy policy was last updated on  
1st March 2021

## 13. How to contact us

Please contact us if you have any questions about our Privacy Policy or information we hold about you via:

**Email:** enquiries@blackdotsolutions.com      **Post:**  
Viola House, Maris Lane, Cambridge, CB2 9LG, UK