Privacy Policy

This policy applies to all personal information collected, processed, shared and stored by Web Behaviour Specialists Ltd (WBS). The policy is to ensure that WBS is compliant with the EU General Data Protection Regulation (GDPR) of 2018, and specifically applies to:

(a) all websites owned and operated by WBS;

(b) all information gathered and processed by WBS in order to provide services to our customers, for example, IP addresses for analytics and improving our customers' websites;

(c) all other personal information that is acquired, processed, shared and stored in order to do business, such as business contacts, personnel information, potential customers, etc..

This privacy policy does not cover how our users may use or share data that they collect using our services.

The principle concepts of our policy are as follows:

1. Definition of personal data

The GDPR applies to personal data meaning any information relating to an identifiable person who can be directly or indirectly identified from that data, for example: name, home address, private email address, bank account details, payment information, support queries, community comments, as well as on-line identifiers, such as IP addresses and cookies.

If you cannot be identified, for example, when personal data has been aggregated or anonymised, then this policy does not apply.

2. How we collect personal data

When you visit our websites or use our services, we collect personal data. The ways we collect it can be broadly categorised into the following:

**Information you provide to us directly:** When you visit or use some parts of our websites and/or services we might ask you to provide personal data. For example, we ask for your contact information when you sign up for a free white paper or email offer, participate in community forums, join us on social media, take part in training and events, contact us with questions or request support. If you don’t want to provide us with personal data, you don’t have to, but it might mean you can’t use some parts of our websites or services.
Information we collect automatically: We collect some information about you automatically when you visit our websites or use our services, like your IP address and device type. We also collect information when you navigate through our websites and services, including what pages you look at and what links you click on. This information is useful for us as it helps us get a better understanding of how you use our websites and services so that we can continue to provide the best experience possible.

Some of this information is collected using cookies and similar tracking technologies. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy.

Information we get from third parties: Most information we collect, we collect directly from you. Sometimes we might collect personal data about you from other sources, such as publicly available materials or trusted third parties like our marketing and research partners. We use this information to supplement the personal data that we already have, in order to better inform, personalise and improve our services, and to validate the personal data you provide.

Social Media: Information from third party social networking sites, including information that social networking sites provide to us if you use your credentials at such social networking sites to log into some of our services (such as your name and email address to pre-populate our sign-up form).

The information you allow us to access varies by social networking site and depends on the level of privacy settings you have in place at the social networking site. You can control and find out more about these privacy settings at the applicable social networking site.

Aggregated and Anonymised data. We also use information we receive in aggregated and anonymised formats to produce reports on trends and statistics, such as mobile search trends, email open rates by industry, campaign best practices or the number of users that have been exposed to, or clicked on, our websites or evaluated or purchased our products and services.

3. How we use your personal data

First and foremost, we use your personal data to operate our websites, to manage our relationship with you and to provide you with any services you have requested. We also use your personal data for other purposes, which may include the following:

(a) To communicate with you. This may include:
(i) providing you with information you have requested from us (like training or education materials) or information we are required to send to you;

(ii) operational communications, like changes to our websites and services, or assistance with using our websites and services;

(iii) marketing communications (about WBS or another product or service we think you might be interested in) in accordance with your marketing preferences;

(iv) asking you for feedback or to take part in any research we are conducting (for which we may engage a third party to assist).

(b) To support you: This may include assisting with the resolution of technical support issues or other issues relating to the websites or services, whether by email or otherwise.

(c) To enhance our websites and services and develop new ones: For example, by tracking and monitoring your use of websites and services so that we can keep improving, or by carrying out technical analysis of our websites and services so that we can optimise your user experience and provide you with more efficient tools.

(d) To protect: So that we can detect and prevent any fraudulent or malicious activity, and make sure that everyone is using our websites and services fairly and in accordance with our terms and conditions

(e) To market to you. You may periodically receive marketing communications from us to keep you apprised of business developments and how WBS may be able to assist you in these. You always have the opportunity to opt out of our marketing communications or change your preferences by following a link in the footer of all non-transactional email messages or by emailing us at admin@web-behaviour.com. Some communications from us are considered transactional or service communications (for example, important notifications and billing information). These cannot be stopped unless our business relationship has terminated.

In addition to sending you marketing communications, we may also use your personal data to display targeted advertising to you online – through our own websites and services or through third party websites and their platforms. Such targeting is only performed with your permission where your consent is required by applicable law.

(f) To analyse, aggregate and report: We may use the personal data we collect about you and other users of our websites and services (whether obtained directly or from third parties) to produce aggregated and anonymised analytics and reports, which we may share publicly or with third parties.
4. How we share your personal data

There will be times when we need to share your personal data with third parties. We will only disclose your personal data to:

(a) third party service providers and partners who assist and enable us to use the personal data to, for example, support delivery of or provide functionality on the website or services, or to market or promote our goods and services to you;

(b) regulators, law enforcement bodies, government agencies, courts or other third parties where we think it is necessary to comply with applicable laws or regulations, or to exercise, establish or defend our legal rights. Where possible and appropriate, we will notify you of this type of disclosure

(c) other people where we have your consent.

If you are located in a jurisdiction where such sharing requires your permission, we will only do so with your consent.

5. International Data Transfers

When we share data, it may be transferred to, and processed in, countries other than the country you live in. These countries may have laws different from what you are used to. If we disclose personal data to a third party in another country, we put safeguards in place to ensure your personal data remains protected.

Under the European Union Data Protection Directive 95/46/EC, companies must ensure certain safeguards when transferring personal data from the European Union and the European Economic Area (EEA) to other countries. Where your personal data is transferred outside the EEA, it will only be transferred to countries that have been identified as providing adequate protection for EEA data, or to a third party where approved transfer mechanisms are in place to protect your personal data – i.e., by entering into the European Commission’s Standard Contractual Clauses, or by ensuring the entity is Privacy Shield certified (for transfers to US-based third parties under the EU-US Privacy Shield Framework). Adhering to the Privacy Shield Principles ensures an organization provides adequate privacy protection under the EU data protection directive.

6. Security

Security is a priority when it comes to personal data. We are committed to protecting personal data and have appropriate technical and organisational measures in place to make sure that happens.
We store personal data in a variety of places within our infrastructure, including system log files, back-end databases (e.g. Dropbox, Google Cloud, Sales Force, Xero), and analytics systems.

The transmission of information via the internet, email or text message is not completely secure. Although we will endeavour to protect your personal information, we cannot guarantee the security of information transmitted via the internet, including by email, and any transmission is at your own risk. Once we have received your information, we will take appropriate technical and organizational measures to safeguard your personal information against loss, theft and unauthorized use, access or modification.

7. Retention

How long we keep your personal data depends on what it is and whether we have an ongoing business need to retain it (for example, to provide you with a service you have requested or to comply with applicable legal or tax requirements.

We will retain your personal data for as long as we have a relationship with you and for a period of time afterwards where we have an ongoing business need to retain it, in accordance with our data retention policies and practices. Following that period, we will delete or anonymise it.

8. Your rights

It’s your personal data and you have certain rights relating to it. With respect to marketing communications, you may notify us to stop these at any time. This can be done by following the unsubscribe instructions in the marketing communication, or by sending your request to admin@web-behaviour.com

You also have rights to:

(a) know what personal data we hold about you, and to make sure it is correct and up to date;

(b) request a copy of your personal data, or ask us to restrict processing your personal data or delete it;

(c) object to our continued processing of your personal data

You may exercise these rights at any time by sending an email to admin@web-behaviour.com

If you’re not happy with how we are processing your personal data, please let us know by sending an email to admin@web-behaviour.com. We will review and investigate your
concerns and try to get back to you within a reasonable period of time. You can also lodge a complaint to your local data protection authority. They will be able to advise you how to submit a complaint.

9. How to contact us

If you are curious about what personal data we have or have a question or feedback for us on this policy, our websites or services, please contact us.

We prefer to communicate with you by email – this ensures that you’re put in contact with the right person. Our email is admin@web-behaviour.com. Alternatively, current telephone numbers and postal addresses, please consult our website, www.web-behaviour.com.

This policy may be updated from time to time. Updated policies will be posted on our website.

Last updated: 10 November 2020