

PRIVACY POLICY

Introduction

Hello. We're Sabio. We are committed to respecting your privacy and protecting your personal data.

Sabio is made up of different trading companies, details of which can be found below. This privacy notice is issued on behalf of the Sabio Group, so when we mention "Sabio", "we" "us" or "our" in this privacy notice, we are referring to the relevant company in the Sabio Group responsible for processing your data.

Sabio Ltd is the controller and responsible for this website.

This privacy and cookie policy ("**privacy policy**") will inform you as to how we use, share and look after your personal data when you visit our websites (regardless of where you visit from), and which we may receive from other sources, and tell you about your privacy rights and how the law protects you.

If you have questions regarding this privacy policy, including any requests to exercise your legal rights, please contact:

The Legal Department
Sabio Group
12th floor, Blue Fin Building, 110 Southwark Street, London, SE1 0SU
Email: dataprotection@sabiogroup.com

For the purposes of the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) (UK GDPR) and the Data Protection Act 2018 (DPA 2018), the regulator for data protection issues for the Sabio Group is the Information Commissioner's Office (ICO) in the UK. You have the right to make a complaint at any time to the ICO, but we would appreciate the chance to deal with your concerns before you approach the ICO, so please approach us in the first instance.

Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on 04/04/2024. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

What privacy policy covers:

This policy covers the following:

- [Collection of Information](#)
- [Use of personal data](#)
- [Disclosure of your personal data](#)
- [International transfers](#)
- [Data Security](#)
- [Data retention](#)
- [Your legal rights](#)
- [Use of cookies](#)
- [Third party websites](#)
- [Group companies](#)
- [Glossary](#)

Collection of Information

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).

How we collect your personal data

We use different methods to collect data from and about you including through direct interactions, automated interactions and from or through third parties.

Direct interactions.

You may give us your **Identity Data** and **Contact Data** by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for or request contact to discuss our products or services;
- apply for a job;
- access Sabio content;
- subscribe to our services or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us feedback or contact us.

The sections “**Data required from you to allow you to access Sabio’s Content**” and “**Data required from you if you apply for a job**” below are examples of direct interactions. Further details below.

Data required from you to allow you to access Sabio’s Content

In order to access and use certain content on the website (including without limitation Sabio’s brochures, white papers, reports, eBooks, case studies, events and webinars) (together “**Content**”) we require you to provide us with:

Identity Data including your first name, last name and title; and **Contact Data** including your postal address, email address and telephone numbers.

Marketing and Communications Data including your preferences in receiving marketing from us, and any third parties (where relevant), and your communication preferences.

Data required from you if you apply for a job

If you apply for a job vacancy with us using our online application form, we require you to provide us with:

Identity Data including your first name, last name and title; and

Contact Data including your postal address, email address and telephone numbers.

Profile Data including your preferences for contact from us regarding future job vacancies, your current salary information, and the information contained in your CV and covering letter.

You may also give us information about you if you report any problems with the website.

Automated interactions/ data collected when you visit our website

On each of your visits to our website, you agree that we may automatically collect, use, store and transfer different kinds of personal data about you, your equipment browsing actions and patterns which we have grouped together as set out below.

We do this by using cookies, server logs and similar technologies. We may also receive **Technical Data** about you if you visit other websites employing our cookies. (Our cookie policy is set out below):

Technical Data, including the internet protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and **Profile Data**, including your interests, preferences, feedback and survey responses.

Usage Data including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time), information you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs), and methods used to browse away from the page.

Collection of Aggregated Data

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. 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. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. 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.

Third parties

We may receive personal data about you from various third parties:

We receive **Technical Data** from analytics providers (such as Google Analytics) as set out in our Cookies policy.

We receive Identity Data and Contact Data from a data analyst ContactBabel Limited, a direct mail and gifting platform.

We take **Identity Data** and **Contact Data** from publicly available data sources, for example LinkedIn or Companies House.

We do not collect any sensitive personal data (also known as **Special Categories of Personal Data**) about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, genetic or biometric data). We don't collect any information criminal convictions or offences.

As we only sell products and services to other businesses, this website is not intended for children or individual consumers and we do not knowingly collect data relating to children or individual consumers.

If you fail to provide your personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you or pursuant to a job application you make, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services) or to consider your job application. In this case, we may have to cancel a product or service you have with us or reject an application you have made or are trying to make with us but we will notify you if this is the case at the time.

Use of Personal Data

Most commonly, we will use your personal data in the following ways:

For Performance of Contract (see glossary) - Where we need to perform the contract we are about to enter into or have entered into with you.

Where it is necessary for our Legitimate Interests (see glossary) and your interests and fundamental rights do not override those interests.

Where we need to comply with a legal obligation (see glossary).

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, a description of all the ways we plan to use your personal data and which of the legal bases we rely on to do so:

Purpose / activity	To deliver website content to you when you have requested it from us
Type of data (described in more detail above)	Identity Data

	Contact Data Marketing and Communications Data
Lawful basis for processing personal data including basis of Legitimate Interest	We have a Legitimate Interest in understanding the products and services prospective customers may be interested in, in order to develop our products and services
Purpose / activity	To use data analytics to improve our website, products/services, marketing, customer relationships and experiences
Type of data (described in more detail above)	Technical Data Profile and Usage Data
Lawful basis for processing personal data including basis of Legitimate Interest	We have a Legitimate Interest in defining types of customers for our products and services, to keep our websites updated and relevant, to develop our business and to inform our marketing strategy
Purpose / activity	Marketing - to contact you, or show you advertising about products, services and/or events which may be of interest to you*
Type of data (described in more detail above)	Identity Data Contact Data Profile Data

<p>Lawful basis for processing personal data including basis of Legitimate Interest</p>	<p>We have a Legitimate Interest in developing our products and services and growing our business. Where we use your personal data to send you a gift, we may also rely on consent as the lawful basis for processing your personal data. Where this is the case, we will have requested your consent prior to sending the gift</p>
<p>Purpose / activity</p>	<p>To register you as an applicant for a job vacancy and to process your automated decisions about your application (such as if you have applied for a role which requires travel and you have indicated that you are unwilling to travel, your application may automatically be rejected)</p>
<p>Type of data (described in more detail above)</p>	<p>Identity Data Contact Data Profile and Usage Data</p>
<p>Lawful basis for processing personal data including basis of Legitimate Interest</p>	<p>(a) We have a Legitimate Interest in processing your application (b) If your application is successful, we will use your personal data to comply with a legal obligation as an employer</p>
<p>Purpose / activity</p>	<p>To administer our websites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes</p>
	<p>Profile Data</p>

Type of data (described in more detail above)	
Lawful basis for processing personal data including basis of Legitimate Interest	We have a Legitimate Interest in administering our website and optimising its functionality

*Marketing - If you do not want us to use your personal data in this way, you may contact us at marketing@sabiogroup.com to stop receiving marketing information from us. If you opt-out of receiving marketing information, this will not apply to our use of your personal data for the other purposes set out above.

Sabio may disclose aggregate statistics about our Website visitors, customers and sales in order to describe our services to prospective partners, advertisers and other reputable third parties and for other lawful purposes, but these statistics will include no personal data.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

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 us at dataprotection@sabiogroup.com.

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.

Disclosure of your personal data

We may also share your personal data with any members of the Sabio Group for the purposes, and using the legal bases, set out above. Additionally, we may share your Personal Data with the following selected third parties: analytics, search engine providers and other service providers that assist us in achieving the purposes and activities set out in the table above.

International transfers

As we may share your personal data with Internal Third Parties or External Third Parties (see Glossary for definitions), this may involve transferring your data outside the UK or European Economic Area (EEA). Whenever we transfer your personal data outside of the UK or EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- (a) we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the ICO or European Commission as applicable;
- (b) where we use certain service providers, we may use specific contracts approved by the ICO or European Commission (as applicable) which give personal data the same protection it has in the UK or Europe (as applicable);
- (c) We may rely on other authorised transfer methods which ensure that appropriate safeguards of your personal data are in place.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK and/or Europe (as applicable).

Data security

Sabio has technological and operational security procedures in place which are designed to protect your personal data from loss, misuse, alteration or unintentional destruction. In addition, we limit access to your personal data to those employees, other staff and third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

Data retention

The personal data you provide to us will be retained only for as long as necessary to fulfil the purposes for which the information was collected or as required by law. Thereafter, Sabio may destroy or delete the personal data or other information, or remove the means by which the personal data or other information can be associated with you, unless its retention is required to satisfy legal, regulatory, accounting or other business requirements.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you.

This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have a right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms. You also have the right to not to be subject to a decision about you based solely on automated processing, which produces legal effects concerning you (or similarly significantly affects you).

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We can provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information for Performance of Contract (see Glossary).

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact dataprotection@sabiogroup.com

You will not normally have to pay a fee to access your personal data (or to exercise any of the other rights stated above), although we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of the other rights stated above). 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.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month (and we may extend the time for response by up to two months) if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Use of Cookies

This website will not use cookies to collect personally identifiable information about you. Find out more in our Cookie Policy.

Third party websites

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. Any third-party websites which you can link to via our website are not covered by this privacy policy and Sabio accepts no responsibility or liability for the use and protection of any information which you provide to such third party websites. You should exercise caution and read the privacy policy of the relevant third-party website before providing any information (including any personal data).

Group companies

The following companies are the trading companies in Sabio Group:

Sabio Ltd (UK)
Make Positive Limited (UK)
Anana Limited (UK)
Sabio (WS) Limited (UK)
Sabio Iberica SAU (ES)
Sabio France SAS (FR)
Sabio BV (NL)
Sabio Italy srl (IT)
Sabio Denmark ApS (DK)
Sabio Germany GmbH (GE)
Sabio Solutions (Singapore) Pte Ltd (SIN)
flexAnswer Solutions Pte Limited (SIN)
Sabio Solutions (Malaysia) Sdn Bhd (MY)
Sabio Africa (Pty) Limited (ZA)
Make Positive Software Solutions Private Limited (India)
Worldstone, Inc. (US (Delaware))

Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Internal Third Parties

Other companies in the Sabio Group (above) acting as controllers or processors and who are based in the countries listed above and provide IT and system administration services and undertake leadership reporting.

External Third Parties

- Service providers acting as processors based in the United Kingdom and the Sabio Group territories who provide IT and system administration services.
- Professional advisers acting as processors or controllers including lawyers, bankers, auditors and insurers based in who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom and other Sabio territories who require reporting of processing activities in certain circumstances.
- Fraud prevention agencies acting as controllers or processors to conduct checks and to prevent fraud.
- Background screening and identity service and verification agencies acting as controllers or processors to conduct checks.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.