

PRIVACY POLICY

This privacy policy applies between you, the User of this Transper Platform and Sabstone Ltd, the owner and provider of this Transper Platform. Sabstone Ltd takes the privacy of your information very seriously. This privacy policy applies to our use of any and all Data collected by us or provided by you in relation to your use of the Transper Platform.

This privacy policy should be read alongside, and in addition to, our Terms and Conditions, which can be found at: [www.transper.io/static/legal/Terms and conditions.pdf](http://www.transper.io/static/legal/Terms%20and%20conditions.pdf).

Please read this privacy policy carefully.

Definitions and interpretation

1. In this privacy policy, the following definitions are used:

Data	collectively all information that you submit to Sabstone Ltd via the Transper Platform. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws;
Cookies	a small text file placed on your computer by this Transper Platform when you visit certain parts of the Transper Platform and/or when you use certain features of the Transper Platform. Details of the cookies used by this Transper Platform are set out in the clause below (Cookies);
Data Protection Laws	any applicable law relating to the processing of personal Data, including but not limited to the Directive 96/46/EC (Data Protection Directive) or the GDPR, and any national implementing laws, regulations and secondary legislation, for as long as the GDPR is effective in the UK;
GDPR	the General Data Protection Regulation (EU) 2016/679;
Sabstone Ltd, we or us	Sabstone Ltd, a company incorporated in England and Wales with registered number 10398649 whose registered office is at 1st Floor Anchorage House, 2 Clove Crescent, E14 2BE;
UK and EU Cookie Law	the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011;
User or you	any third party that accesses the Transper Platform
Transper Platform	the Transper Platform that you are currently using, www.transper.io , and any sub-domains of this site unless expressly excluded by their own terms and conditions.

2. In this privacy policy, unless the context requires a different interpretation:
 - a. the singular includes the plural and vice versa;

- b. references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy;
- c. a reference to a person includes firms, companies, government entities, trusts and partnerships;
- d. "including" is understood to mean "including without limitation";
- e. reference to any statutory provision includes any modification or amendment of it;
- f. the headings and sub-headings do not form part of this privacy policy.

Scope of this privacy policy

- 3. This privacy policy applies only to the actions of Sabstone Ltd and Users with respect to this Transper Platform. It does not extend to any Websites that can be accessed from this Transper Platform including, but not limited to, any links we may provide to social media Websites.
- 4. For purposes of the applicable Data Protection Laws, Sabstone Ltd is the "data controller". This means that Sabstone Ltd determines the purposes for which, and the manner in which, your Data is processed.

Data collected

- 5. We may collect the following Data, which includes personal Data, from you:
 - a. name;
 - b. contact Information such as email addresses and telephone numbers;
 - c. IP address (automatically collected);
 - d. web browser type and version (automatically collected);
 - e. operating system (automatically collected);
 - f. information about the way you use the Transper Platform
 - g. any data uploaded by youin each case, in accordance with this privacy policy.

How we collect Data

- 6. We collect Data in the following ways:
 - a. data is given to us by you ;
 - b. data is received from other sources; and
 - c. data is collected automatically.

Data that is given to us by you

- 7. Sabstone Ltd will collect your Data in a number of ways, for example:
 - a. when you contact us through the Transper Platform, by telephone, post, e-mail or through any other means;
 - b. when you register with us and set up an account to receive our products/services;

- c. when you elect to receive marketing communications from us;
 - d. when you use our services;
- in each case, in accordance with this privacy policy.

Data that is received from third parties

- 8. Sabstone Ltd will receive Data about you from the following third parties:
 - a. Hubspot;
 - b. LinkedIn;
 - c. FullStory.
 - d. Glenigan

Data that is received from publicly available third parties sources

- 9. We will receive Data about you from the following publicly available third party sources:
 - a. LinkedIn.
 - b. Facebook
 - c. Instagram
 - d. Twitter

Data that is collected automatically

- 10. To the extent that you access the Transper Platform, we will collect your Data automatically, for example:
 - a. we automatically collect some information about your visit to the Transper Platform. This information helps us to make improvements to Transper Platform content and navigation, and includes your IP address, the date, times and frequency with which you access the Transper Platform and the way you use and interact with its content.
 - b. we will collect your Data automatically via cookies, in line with the cookie settings on your browser. For more information about cookies, and how we use them on the Transper Platform, see the section below, headed "Cookies".

Our use of Data

- 11. Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Transper Platform. Specifically, Data may be used by us for the following reasons:
 - a. internal record keeping;
 - b. improvement of our products / services;

in each case, in accordance with this privacy policy.

12. We may use your Data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not satisfied with this, you have the right to object in certain circumstances (see the section headed "Your rights" below).
13. When you register with us and set up an account to receive our services, the legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

Keeping Data secure

14. We will use technical and organisational measures to safeguard your Data, for example:
 - a. access to your account is controlled by a password and a user name that is unique to you.
 - b. we store your Data on secure servers.
16. Technical and organisational measures include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your Data, please let us know immediately by contacting us via this e-mail address: contact@transper.co.
17. If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

Data retention

18. Unless a longer retention period is required or permitted by law, we will only hold your Data on our systems for the period necessary to fulfil the purposes outlined in this privacy policy or until you request that the Data be deleted.
19. Even if we delete your Data, it may persist on backup or archival media for legal, tax or regulatory purposes.

Your rights

20. You have the following rights in relation to your Data:
 - a. **Right to access** - the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update or delete such information. If we provide you with access to the information we hold about you, we will not charge you for this, unless your request is "manifestly unfounded or excessive." Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.
 - b. **Right to correct** - the right to have your Data rectified if it is inaccurate or incomplete.
 - c. **Right to erase** - the right to request that we delete or remove your Data from our systems.
 - d. **Right to restrict our use of your Data** - the right to "block" us from using your Data or limit the way in which we can use it.
 - e. **Right to data portability** - the right to request that we move, copy or transfer your Data.
 - f. **Right to object** - the right to object to our use of your Data including where we use it for our legitimate interests.

21. To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us via this e-mail address: contact@transper.co.
22. If you are not satisfied with the way a complaint you make in relation to your Data is handled by us, you may be able to refer your complaint to the relevant data protection authority. For the UK, this is the Information Commissioner's Office (ICO). The ICO's contact details can be found on their website at <https://ico.org.uk/>.
23. It is important that the Data we hold about you is accurate and current. Please keep us informed if your Data changes during the period for which we hold it.

Links to other websites

24. This Transper Platform may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

Changes of business ownership and control

25. Sabstone Ltd may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of Sabstone Ltd. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purposes for which it was originally supplied to us.
26. We may also disclose Data to a prospective purchaser of our business or any part of it.
27. In the above instances, we will take steps with the aim of ensuring your privacy is protected.

Cookies

28. This Transper Platform may place and access certain Cookies on your computer. Sabstone Ltd uses Cookies to improve your experience of using the Transper Platform and to improve our range of services. Sabstone Ltd has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.
29. All Cookies used by this Transper Platform are used in accordance with current UK and EU Cookie Law.
30. Before the Transper Platform places Cookies on your computer, you will be presented with a message bar requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling Sabstone Ltd to provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Transper Platform may not function fully or as intended.
31. This Transper Platform may place the following Cookies:

Type of Cookie	Purpose
Strictly necessary cookies	These are cookies that are required for the operation of our Transper Platform. They include, for example, cookies that enable

	you to log into secure areas of our Transper Platform, use a shopping cart or make use of e-billing services.
Analytical/performance cookies	They allow us to recognise and count the number of visitors and to see how visitors move around our Transper Platform when they are using it. This helps us to improve the way our Transper Platform works, for example, by ensuring that users are finding what they are looking for easily.
Functionality cookies	These are used to recognise you when you return to our Transper Platform. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

32. We use the following third-party services which might use cookies. Please find the details below:
1. FullStory Analytical Cookies - <https://www.fullstory.com/resources/fullstory-gdpr-you>
 2. Hub spot Necessary cookies - <https://knowledge.hubspot.com/reports/what-cookies-does-hubspot-set-in-a-visitor-s-browser>
 3. Hub spot Analytics cookies - <https://knowledge.hubspot.com/reports/what-cookies-does-hubspot-set-in-a-visitor-s-browser>
 4. Hub spot Functionality cookies - Chatflow cookie - <https://knowledge.hubspot.com/reports/what-cookies-does-hubspot-set-in-a-visitor-s-browser>
34. You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser.
34. You can choose to delete Cookies at any time; however you may lose any information that enables you to access the Transper Platform more quickly and efficiently including, but not limited to, personalisation settings.
35. It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.
36. For more information generally on cookies, including how to disable them, please refer to aboutcookies.org. You will also find details on how to delete cookies from your computer.

General

37. You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.
38. If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.
39. Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.

40. This Agreement will be governed by and interpreted according to the law of England and Wales. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.

Changes to this privacy policy

41. Sabstone Ltd reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Transper Platform and you are deemed to have accepted the terms of the privacy policy on your first use of the Transper Platform following the alterations. You may contact Sabstone Ltd by email at contact@transper.co.

Cookies

Below is a list of the cookies that we use. We have tried to ensure this is complete and up to date, but if you think that we have missed a cookie or there is any discrepancy, please let us know.

Strictly necessary

We use the following strictly necessary cookies:

Description of Cookie	Purpose
Strictly necessary cookies	We use this session cookie to remember you and maintain your session whilst you are using our Transper Platform

Analytical/performance

We use the following analytical/performance cookies:

Description of Cookie	Purpose
Analytical or performance cookies	We use this cookie to help us analyse how users use the Transper Platform.

Functionality

We use the following functionality cookies:

Description of Cookie	Purpose
Functional cookies	We use this cookie to manage Transper Platform functions like chat.