

Sytorus Privacy Statement

Last updated 25th September 2019

Introduction

Welcome to Sytorus. This policy explains how we handle and use your personal information and your rights in relation to that information.

Sytorus (“The Organisation”, “we”, “our” or “us”) is committed to protecting and respecting your privacy.

This Privacy Policy explains why and how we will use the personal information that we have obtained from you or others, with whom we share it and the rights you have in connection with the information we use. Please read the following carefully.

This policy describes the way we handle and use the personal information that we obtain from all the different interactions you may have with us as a client or when you contact us.

Your privacy on the Internet is important to us. As the Internet offers the ability to collect certain types of information about users, we want you to understand the terms and conditions surrounding the capture, use and processing of any information relating to you which we gather.

Sytorus complies with the requirements of the relevant European Data Protection legislation based on the jurisdiction of our main establishment in the Republic of Ireland, namely:

- The General Data Protection Regulation (2016/679)
- The Irish Data Protection Act (2018)
- The EC (Electronic Communications Regulation) Act 2011.

Sytorus have registered offices at: Unit 243, The Capel Building, St. Mary's Abbey, Dublin 7, Ireland and we are a company registered in Ireland under company number 529183. We act as the data controller when processing your data on www.sytorus.com.

This policy was last updated on the date that appears at the top of this page.

What Information Does Sytorus Collect?

Where personal data is provided by a Sytorus.com visitor, the system collects the following pieces of personal information through the web site such as:

- First Name
- Surname
- Email
- Email outside of office hours
- Company
- Telephone Number
- Message or query entered by the visitor

We gather various types of information, including information that identifies or may identify you as an individual (“Personal Information”) as explained in more detail below.

Information We Automatically Collect:

When you use the Website

When you visit the Website, we collect certain information related to your device, such as and not limited to the following: your device’s IP address, referring website, what pages your device visited, and the time and date that you visited our website using this device.

How do we use the information?

We will use the information we collect via our Website:

- To administer our website and for internal operations, including troubleshooting, data analysis, testing, statistical and survey purposes;
- To improve our website to ensure that content is presented in the most effective manner for you and for your computer;
- For trend monitoring, marketing and advertising;
- For purposes made clear to you at the time you submit your information – for example, to provide you with information you have requested about our Services; and
- As part of our efforts to keep our website secure.

Our use of your Personal Information may be based on our legitimate interest to ensure network and information security, and for our direct marketing purposes on the basis that you have consented to such communication (e.g. when you request an onboarding).

The Periods For Which We Retain Your Personal Information

We are obliged to retain certain information to ensure accuracy, to help maintain quality of service and for legal, regulatory, fraud prevention and legitimate business purposes.

Other information will be retained for no longer than is necessary for the purpose for which it was obtained by us or as required or permitted for legal, regulatory, fraud prevention and legitimate business purposes. In general, we will hold this information for a period of seven years, unless we are obliged to hold it for a longer period under law or applicable regulations.

We will not hold your personal information in an identifiable format for any longer than is necessary for the purposes for which we collected it. For certain purposes we retain your personal information indefinitely (e.g. to suppress marketing messages).

How do we share and disclose information to third parties?

Sytorus will use third-party tools to improve and enhance your ability to communicate with us. For example, we use Intercom and HubSpot, which are third party tools to provide you with our web chat services. These third parties may process/transfer your data to countries outside of the E.U. but only in accordance with the relevant legislation and using the appropriate legal mechanisms to safeguard the transfer.

We control your personal data throughout and assure you that it will only be used for the purpose outlined above. All processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures. For more information, please contact us at info@sytorus.com.

We do not rent or sell your Personal Information to anyone. We may share and disclose information (including Personal Information) about our customers in the following limited circumstances:

Business Transfers:

We may choose to buy or sell assets and may share and/or transfer customer information in connection with the evaluation of and entry into such transactions. Also, if we (or our assets) are acquired, or if we go out of business, enter bankruptcy, or go through some other change of control, Personal Information could be one of the assets transferred to or acquired by a third party.

Sytorus Ltd:

We reserve the right to access, read, preserve, and disclose any information as necessary to comply with law or court order; enforce or apply our agreements with you and other agreements; or protect the rights, property, or safety of Sytorus, our employees, our users, or others.

Disclosures for National Security or Law Enforcement:

Under certain circumstances, we may be required to disclose your Personal Information in response to valid requests by public authorities, including to meet national security or law enforcement requirements.

Security

We use appropriate technical, organisational and administrative security measures to protect any information we hold in our records from loss, misuse, and unauthorized access, disclosure, alteration and destruction.

Unfortunately, no company or service can guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time. Among other practices, your account is protected by a password for your privacy and security. You must prevent unauthorized access to your account and Personal Information by selecting and protecting your password appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account.

Cookies

What is a Cookie?

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a Site. Cookies are then sent back to the originating Site on each subsequent visit, or to another Site that recognises that cookie. Cookies are useful because they allow a Site to recognise a user's device. You can find more information about cookies at:

- www.allaboutcookies.org
- www.youronlinechoices.e

Cookies do lots of different jobs, like letting you navigate between pages efficiently remembering your preferences, and generally improve your website experience. They can also help to ensure that adverts you see online are more relevant to you and your interests.

Most Sites you visit will use cookies in order to improve your user experience by enabling that Site to 'remember' you, either for the duration of your visit (using a 'session cookie') or for repeat visits (using a 'persistent cookie').

Cookies may be set by the Site you are visiting ('first party cookies') or they may be set by other Sites who run content on the page you are viewing ('third party cookies').

Cookies used on this Site

Sytorus uses first party and third-party cookies. We use cookies in order to make this Site easier to use, to support the provision of information and functionality to you, as well as to provide us with information about how this Site is used so that we can make sure it is as up to date, relevant and error free as we can.

By continuing to browse the Site you are agreeing to our use of cookies and the cookies notice at the top of your browser will disappear. If you block our use of cookies, you may be unable to access certain areas of our Site and certain functions and pages will not work in the usual way. Doing so may also affect our ability to update this Site to cater for user preferences and improve its performance.

1. Strictly Necessary Cookies

Strictly necessary cookies are essential in order to enable you to move around the Site and use its features and/or services. Without these absolutely necessary cookies, the Site will not perform as smoothly for you as we would like it to and we may not be able to provide the Site with certain services or features.

2. Performance Cookies

Performance cookies collect information about how visitors use a Site; for instance, which pages visitors go to most often, and if they get error messages from web pages. These cookies do not collect any information that identifies a visitor. The information that these cookies collect is aggregated and is therefore anonymous. It is only used to improve how a Site works.

3. Functional Cookies

Functional cookies allow this Site to remember choices you make (such as your username and log in details) and any customisations you make to Site pages during your visit in order to provide enhanced, personalised features. For instance; these cookies can be used to remember changes you have made to text size, fonts and other elements of web pages that can be customised. They may also be used to provide services which you have asked for such as watching a video or commenting on a blog. The information these cookies collect may be anonymous and they cannot track your browsing activity on other Sites.

4. Targeting or Advertising Cookies

Targeting or Advertising cookies are linked to services provided by third parties. The third party provides these services in return for recognising that you have visited our Site. These cookies collect information about your browsing habits on this Site in order to make advertising both on this Site and other Sites you subsequently visit relevant to you and your interests, to limit the number of times those adverts are served to you and to help measure the effectiveness of advertising campaigns.

Managing Cookies in your Browser

In addition to the options provided above, you may refuse or accept cookies from the Site at any time by activating settings on your browser. Information about the procedure to follow in order to enable or disable cookies can be found on your Internet browser provider's site via your help screen. We have also supplied links to several of the more popular browsers for procedures on how to view and disable cookies.

- [Google Chrome Browser](#) 
- [Microsoft Internet Explorer Browser](#) 
- [Mozilla Firefox Browser](#) 
- [Apple Safari Browser](#) 
- [Opera Web Browser](#) 

Please be aware that if cookies are disabled, not all features of the Site may operate as intended.

How to delete Cookies

For further information on how to delete cookies we recommend that you read the information provided at following link:

<http://www.allaboutcookies.org/manage-cookies/clear-cookies-installed.html>

Google Analytics:

On some of our Website, we also may utilize Google Analytics, a web analysis service provided by Google, to better understand your use of the Website and Services. Google Analytics collects information such as how often users visit the Websites, what pages they visit and what other sites they used prior to visiting. Google uses the data collected to track and examine the use of the Websites, to prepare reports on its activities and share them with other Google services. Google may use the data collected on the Websites to contextualize and personalize the ads of its own advertising network. Google's ability to use and share information collected by Google Analytics about your visits to the Websites is restricted by the Google Analytics Terms of Use and the Google Privacy Policy.

Further Information

You can find more information about cookies by visiting www.allaboutcookies.org to obtain detailed information on how to prevent cookies from being set on your particular browser.

For further information about Google Analytics please see:
Safeguarding your Data.

To opt out of being tracked by Google Analytics across all Sites, visit:

<http://tools.google.com/dlpage/gaoptout>

If you would like further information about the cookies used in relation to YouTube videos, the YouTube privacy notice, including details about YouTube related cookies, is available at:

<http://www.google.co.uk/policies/privacy/>

If you would like to find out more about advertising networks and affiliate programmes and how cookies are used for these purposes, please visit:

www.youronlinechoices.com

This is an information portal which is run by the Internet Advertising Bureau (IAB), the trade association for digital advertising, and will provide you with all the information you need to know about online behavioural advertising and the choices available to you.

Your Privacy Rights

What choices do I have?

You can always opt not to disclose information to us, but keep in mind some information may be needed to register with us or to take advantage of some of our features.

Cookies

You can accept or reject cookies for our Websites through our Cookie Preference Centre, accessible by clicking the “cookie settings” button in the applicable Website Cookie Notice. You can also do so by adjusting your web browser controls. Please consult the Website Cookie Notice for more information about our use of cookies on the Website and how to accept and reject them.

Marketing Communications

You can opt-out of receiving certain promotional or marketing communications from us at any time, by using the unsubscribe link in the emails communications we send.

If you have an account for our Services, including PrivacyEngine we will still send you non-promotional communications, like service-related emails.

How Can I Exercise My Data Subject Rights?

All individuals have the right to a copy of personal information we hold relating to them. This is achieved through a Subject Access Request (SAR). A SAR can be submitted by emailing hugh.jones@sytorus.com, indicating the scope of personal data required.

In order to be valid, a SAR must be in writing (paper-based or e-mail will suffice) and the requestor may be required to provide adequate evidence of their identity, in order to avoid the inadvertent disclosure of another person's information.

We will respond to all SARs as quickly as possible, but in any event, within one month of receipt of the validated request. Furthermore, Sytorus respects all of the rights of data subjects as articulated in the GDPR.

Additionally, if you would like to access, review, update, rectify, and delete any Personal Information we hold about you, or exercise any other data subject right available to you under the EU General Data Protection Regulation (GDPR), you may submit a request by emailing hugh.jones@sytorus.com.

International Data Transfers

Sytorus do not transfer your personal information outside of Europe however as mentioned above some of our third-party processors may do so.

All information you provide to us is stored on our secure servers which are located within the European Economic Area (EEA).

If at any time we transfer your personal information to, or store it in, countries located outside of the EEA (for example, if our hosting services provider changes) we will amend this policy and notify you of the changes. We will also ensure that appropriate safeguards are in place for that transfer and storage as required by applicable law. This is because some countries outside of the EEA do not have adequate data protection laws equivalent to those in the EEA. If we transfer your personal information to the United States of America, we will only send the personal information to companies that participate in the Privacy Shield framework (or such other framework that may replace it from time to time) or for which we have an alternative safeguard in place in accordance with applicable law. Where they apply to our data transfer activities, we may rely on adequacy decisions by the European Commission about certain countries for data transfers to countries outside the EEA.

Children

We do not knowingly collect or solicit personal information from anyone under the age of 18. If you are under 18, please do not attempt to register for the Services or send any Personal Information about yourself to us. If we learn that we have collected Personal Information from a child under age 18, we will delete that information as quickly as possible. If you believe that a child under 18 may have provided us with Personal Information, please contact us at hugh.jones@sytorus.com.

Security and Links to Other Websites

We take the security of your personal information seriously and use a variety of measures based on good industry practice to keep it secure. Nonetheless, transmissions over the internet and to our Site may not be completely secure, so please exercise caution. When accessing links to other websites, their privacy policies, not ours, will apply to your personal information.

We employ security measures to protect the personal information you provide to us, to prevent access by unauthorised persons and unlawful processing, accidental loss, destruction and damage.

The transmission of information via the internet is not completely secure. Although we will do everything possible to protect your personal information, we cannot guarantee the security of any personal information during its transmission to us online. You accept the inherent security implications of using the internet and will not hold us responsible for any breach of security unless we are at fault.

If you are using a computer or terminal in a public location, we recommend that you always log out and close the website browser when you complete an online session for your security. In addition, we recommend that you take the following security measures to enhance your online safety:

- When creating a password, we recommend use at least 8 characters with a combination of letters and numbers.
- We recommend you frequently change your password.
- Keep your passwords private. Remember, anyone who knows your password may access your account.
- Avoid using the same password for multiple online accounts.
- We will never ask you to confirm any account or credit card details via email. If you receive such an email claiming to be from Sytorus asking you to do so, please ignore it and do not respond and report it to us.

Our Site may contain links to other websites run by other organisations which we do not control. This policy does not apply to those other websites, so we encourage you to read their privacy policies. We specifically disclaim responsibility for their content, privacy practices and terms of use, and we make no endorsements, representations or promises about their accuracy, content or thoroughness. Your disclosure of personal information to third party websites is at your own risk.

Changes to Policy

We reserve the right to change this policy at any time by notifying users of the existence of a revised policy. By continuing to use the Sytorus Website, you agree to be bound by the amended policy. We will inform you via a notice on the website when a policy is updated.

Please refer any questions in relation to this Policy, or to Sytorus' processing of your personal data, to the Sytorus Chief Privacy Officer, hugh.jones@sytorus.com.

Making a Complaint

Sytorus only processes your personal information in compliance with this privacy policy and in accordance with the relevant data protection laws. If, however, you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the Irish Supervisory Authority.

Data Protection Commission
21 Fitzwilliam Square South
Dublin 2
D02 RD28
Ireland