



## T-RISK privacy policy

---

This policy was last updated on 22 November 2018

### About this policy

This policy explains how we collect and use personal data from and about users of our geo-political analysis, operations services, document protection services, global positioning services, and other digital services to you including via the T-Risk app, or the Triskel or T-Risk websites (“Services”).

This policy does not apply to any websites, apps, products or services of any other organisations that you may access the Services or how any third-party organisations which advertise products and services through the Services collect and use your personal data.

As we make changes to our Services, we may need to update this policy. If we make any important changes that affect your rights and interests, we will make sure we bring this to your attention and explain what this means for you.

If you have any questions in relation to this policy or wish to exercise any of your rights under data protection law, you should contact us at [info@t-risk.io](mailto:info@t-risk.io).

### Who we are

We are T-Risk Limited, a company registered in England and Wales. Our company registration number is 11665027 and our registered office address is 86-90 Paul St, London EC2A 4NE. Our registered VAT number is 674332. We are registered as a controller with the UK Information Commissioner’s Office under number ZA478408.

### The data we collect about you and how we use it

Personal data means any data that identifies or can be used to identify a person. It does not include data where the identity has been removed (anonymous data).

We may also collect and use data that is derived from your personal data, but which does not directly or indirectly reveal your identity. This data may be combined with data collected about other users of our Services to calculate traffic flow and other use statistics to optimise our Services. This is not considered personal data under the law unless we combine it with other data that can be used to directly or indirectly identify you. We will not do this.

Unless you specifically inform us, we do not collect any details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions,

trade union membership, information about your health and genetic and biometric data. Nor do we collect any information about criminal convictions and offences.

1. Data we collect	2. How we use it	3. Legal grounds for our use
<p>4. Your name, address, mobile phone number, other contact details and age. To register a premium Services account, you will need to submit a valid card payment method</p> <p>5.</p>	<p>6. To open your free or premium account for our Services.</p>	<p>7. Providing our Services to you (performance of our contract with you).</p>
	<p>8. Notifying you about changes to our Services, this Policy or our Terms &amp; Conditions.</p>	<p>9. Providing our Services to you (performance of our contract with you).</p>
	<p>10. Providing you with information about other products and services we offer that are similar to those you have already purchased or enquired about.</p> <p>11.</p>	<p>12. Pursuing our legitimate interests in marketing our products and services.</p>
<p>13. Your login details.</p>	<p>14. To provide you with secure access to the Services.</p>	<p>15. Providing our Services to you (performance of our contract with you).</p>
<p>16. The content of any messages you exchange with us by email or online chat and any posts and messages directed to us on social media.</p>	<p>17. To respond to your enquiries, complaints, or communications relating to our Services.</p>	<p>18. Providing our Services to you (performance of our contract with you).</p>
<p>19. Data about the type of your device, operating system / firmware version, browser version, IP address of your device and network, device identifiers (such as the IMEI number of your device and MAC address of its wireless network interface) and time zone setting of your device.</p>	<p>20. Ensuring that our Services are presented in the most effective manner for your device; understanding the types of devices and networks used to connect to our Services so that we can them; and ensuring our Services are secure and that your personal data are protected</p> <p>21.</p>	<p>22. Pursuing our legitimate interests in marketing our products and services.</p>

23. Transaction and financial information relating to your subscription to any premium Services.	24. Ensuring that proper records are kept of any payments made from you to us and vice versa.	25. Providing our Services to you (performance of our contract with you), and compliance with our legal obligations in relation to tax and accounting.
26. Your history of use and interactions with our Services. This includes how you arrive at our website or app, the time and frequency of your visits, the time spent by you on each page or screen, how you interact with our Services, the links that you follow, documents you download, and content that you view.	27. Optimising the delivery of our Services by understanding the way in which you prefer to use them.	28. Pursuing our legitimate interests in the improvement of our Services.
29. Your location: We will use the IP address of your device to identify your approximate location and may also, with your permission, use information from your device's cellular, Wi-Fi, Global Positioning System (GPS) and/or Bluetooth to determine your location. Note: most devices enable you to turn location tracking services off within settings. However, we will still use the IP address of your device to identify your approximate location in order to comply with geographic/territorial restrictions.	30. To deliver our geo-location Services.	31. Providing our Services to you (performance of our contract with you).
	32. Complying with geographic / territorial restrictions and with legal compliance and data residency obligations.	33. Compliance with our legal obligations.
	34. Ensuring that our Services are delivered in an effective manner for your device; and optimising their performance depending on the location of our servers.	35. Providing our Services to you (performance of our contract with you).

#### Data about you we receive from others and how we use it

36. Data we collect	37. How we use it	38. Legal grounds for our use
39. Social networks: If you sign-up to use our Services using Facebook® or Gmail®, we will collect your username and encrypted access credentials and your basic profile information (including profile image).	40. Providing you with access to our Services 41.	42. Providing our Services to you (performance of our contract with you). 43.
44. Publicly available third-party data (such as data available from Google Analytics or non-private social network sources).	45. Adapting our Services to your preferences, research and development.	46. Pursuing our legitimate interests in the improvement of our Services.

### Who we share your data with

We do not sell any personal data for commercial purposes. However, we may have to share your personal data with:

- our group companies who deliver our Services
- technical service providers: such as companies hosting our websites or apps, and companies whose services provide the functionality necessary for our Services to be delivered
- prospective buyers or sellers: If we sell or buy any business or assets, or enter into negotiations for any merger or acquisition, we may disclose your data to the prospective buyer or seller of such business or assets. We will only do so if we are satisfied that sufficient safeguards and agreements are in place in respect of such disclosure
- rights holders and law enforcement: We may be required to disclose or share your data with individuals or organisations enforcing their legal rights, or in order to comply with any legal or regulatory obligation or request. We may also share your data with our legal advisers and law enforcement in order to protect third party rights and to enforce our Terms & Conditions. We will not do so without fully considering the implications of such disclosure and your privacy rights and will, where lawfully possible, seek to resist such disclosure.

We do not currently transfer your personal data outside of the European Economic Area. If this becomes necessary at any point, we will ensure that a similar degree of protection applies to your personal data in one or more of the following ways:

- the country to which your personal data is transferred is deemed by the European Commission to provide a similar degree of protection for your personal data.

- we have entered into a specific contract with our service providers that has been approved by the European Commission as providing a similar degree of protection for your personal data
- where any service provider is based in the US and they have self-certified under the [EU-US Privacy Shield Framework](#) which requires them to provide a similar degree of protection for your personal data]

### How we keep your data secure

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We also limit access to your personal data to those within our organisation that have a need to access it. They will only process your personal data on our instructions and they are required to keep your personal data confidential.

We have put in place procedures to deal with any suspected personal data breach and will notify you and the Information Commissioner's Office or any other relevant regulator where we are legally required to do so.

### How long we keep your data for

We will only keep your personal data for as long as necessary in connection with the purposes we collected it for and to comply with any legal, accounting or reporting requirements. To determine how long we keep your personal data for, we consider the amount, nature and sensitivity of the personal data, the purposes for which it was collected and the potential risk of harm from us continuing to keep it.

We will retain transactional data in relation to payment for our premium Services for six years after the transaction date. Except as a required in connection with transactional data, all other account details will be deleted following expiry or termination of your subscription or use of the Services.

We will retain the analytical data collected about your use of our Services for a period of 14 months.

We may retain any data that does not identify you indefinitely.

### Local Storage

Although we currently do not use Cookies in delivering our services to you, we do use Local Storage in delivering our services to you. Local Storage records information submitted by you locally on your browser or app device. This information can either be stored for the duration of your session, or permanently. You can delete this information in your browser or via our app.

The data that may be stored is described below:

Name	First or Third Party	Duration	Purpose
------	----------------------	----------	---------

username	First	Session	Username of user
app_token	First	Session	Device token of user
isTrackingEnable	First	Session	Determinate if user can use track service
trisk_id	First	Session	Id of user
permissions	First	Session	Permissions of user
user_params	First	Session	All parameters of user
my_countries	First	Session	Saved countries of user
set_gps	First	Session	Determinate if user have gps enabled
in_travel_yes	First	Session	Determinate if user is in travel mode
travel	First	Session	Info about user travel
lat	First	Session	Latitude of user
lng	First	Session	Longitude of user

## Your rights

If you are an individual in the European Union, you have a number of rights in relation to the personal data we hold about you:

- You have the [right to request access](#) to and be provided with a copy of the personal data held about you together with certain information about the processing of such personal data to check that are holding it lawfully
- You have the [right to ask us to correct](#) any inaccurate or incomplete personal data held about you
- You have the [right to ask us to delete or remove](#) any personal data held about you where there is no good reason for us to continue holding it or where you have exercised your right to object

- You have the [right to ask us to restrict](#) how we hold your personal data, for example, to confirm its accuracy or our reasons for holding it
- You have the [right to object](#) to our holding of any personal data about you which is based on our legitimate interests or those of a third party based on your particular circumstances. You also have the right to object to our holding your personal data for direct marketing purposes
- You have the right to receive or [request that we transfer](#) a copy of the personal data we hold about you in an electronic format where the basis of our holding such information is your consent or the performance of a contract and the information is processed by automated means
- You have the right to complain to the [Information Commissioner's Office \(ICO\)](#) or any other [EU supervisory authority](#) in relation to how we collect and use your personal data

You will not have to pay any fee to exercise any of the above rights though we may charge a reasonable fee or refuse to comply with your request if any request is clearly unfounded or excessive. Where this is the case, we will let you know.

To protect the confidentiality of your personal data we may ask you to verify your identity before fulfilling any request in relation to your personal data.