

Rendr Privacy policy

Please read this Privacy policy. This policy explains who we are, how we process personal data and, if you are the subject of any personal data concerned, what rights you have and how to get in touch with us if you need to.

We comply with the UK General Data Protection Regulation (“**UK-GDPR**”) and the UK Data Protection Act 2018. We respect the privacy of every person who visits or registers with www.tlampay.com (the “**Site**”) and agree that any information relating to an identified or identifiable individual (“**personal data**”) is deserving of protection.

On this Site there may be links to other websites. Please understand that if a particular website has its own privacy policy then that policy – not this Privacy policy – applies. We recommend that you consult the privacy statements of all third-party websites you visit by clicking on the “privacy” link typically located at the bottom of the webpage you are visiting.

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1. Who we are

We are TLAM TECHNOLOGIES LTD, a company incorporated in England and Wales with registration number **08908265** whose registered office is at 3rd Floor, The Library Building, Sun Street, Tewkesbury, England, GL20 5NX (“**tlamTechnologies**”, “**Rendr**”, “**we**”, “**us**” or “**our**”). We are the data controller responsible for your personal data via the Site. Our Data Protection Officer can be contacted by email at rc@tlam.co.uk by writing to us at tlam Technologies Limited, Third Floor, The Library Building, Tewkesbury GL20 5NX.

2. What personal data we collect and for which purpose

We collect the following personal data about you and in particular:

- a. When you register with us we collect your full name, email address, account log-in credentials and bank details.
- b. When you fill-in our online form to contact our sales team, we collect your full name, work email, country, and anything else you tell us about your project, needs and timeline;
- c. When you respond to our emails or surveys we collect your email address, name and any other information you choose to include in the body of your email or responses;
- d. When you contact us by phone, we will collect the phone number you use to call us.

You may also choose to submit information to us via other methods, including:

- e. in response to marketing or other communications;
- f. through social media or online forums;
- g. through participation in an offer, program or promotion;
- h. in connection with an actual or potential business relationship with us; or
- i. by giving us your business card or contact details at trade shows or other events.

3. How we use your personal data

- a. We rely upon a number of legal grounds to ensure that our use of your personal data is compliant with applicable law. We use personal data to facilitate the business relationships we have with our users, to comply with our financial regulatory and other legal obligations, and to pursue our legitimate business interests.
- b. We use personal data to verify the identity of our Users in order to comply with fraud monitoring, prevention and detection obligations, laws associated with the

identification and reporting of illegal and illicit activity, such as AML (Anti-Money Laundering) and KYC (Know-Your-Customer) obligations, and financial reporting obligations.

- c. Under the GDPR we may rely on our legitimate business interests to process personal data about you.
- d. The following list sets out the business purposes that we have identified as legitimate. We:
 - i. Monitor, prevent and detect fraud and unauthorized payment transactions;
 - ii. Mitigate financial loss, claims, liabilities or other harm;
 - iii. Respond to inquiries, send service notices and provide customer support;
 - iv. Promote, analyze, modify and improve Rendr;
 - v. Manage, operate and improve the performance of our Website and Services by understanding their effectiveness and optimizing our digital assets;
 - vi. Analyze and advertise Rendr;
 - vii. Where we anonymise your personal data (i.e. so that it can no longer be associated with you) for further research or statistical purposes, then we may use this information indefinitely without further notice to you;
 - viii. Ensure network and information security throughout Rendr;
 - ix. Transmit personal data within our affiliates for internal administrative purposes.
- e. We may send you email marketing communications about Rendr services, invite you to participate in our events or surveys, or otherwise communicate with you for marketing purposes, provided that we do so in accordance with the consent requirements that are imposed by applicable law. When we collect your business contact details through our participation at trade shows or other events, we may use the information to follow-up with you regarding an event, send you information that you have requested on our products and services and, with your permission, include you on our marketing information campaigns.
- f. We use this information to facilitate the provision of our Services to you, the client. In addition, we will process identification and background information as part of our business acceptance, finance, administration and marketing processes, including anti-money laundering, conflict, reputational and financial checks, and to fulfil any other legal or regulatory requirements to which we may be subject.

4. Who we share your personal data with

We only share your personal data with those who we reasonably believe require access. In doing so we may share your personal data with:

- a. We share personal data within tlamTechnologies in order to provide our Services and for internal administration purposes;
- b. We share personal data with a limited number of our service providers. We authorize those service providers to use or disclose the personal data only as necessary to perform services on our behalf or comply with legal requirements. We require such service providers to contractually commit to protect the security and confidentiality of personal data they process on our behalf;
- c. We share personal data with third party business partners when this is necessary to provide our Services to our Users. Examples of third parties to whom we may disclose personal data for this purpose are payment method providers when we provide payment processing services;
- d. In the event that we enter into a merger, sale, joint venture, assignment, transfer, change of control, or other disposition of all or any portion of our business, assets or stock, we may share personal data with third parties for the purpose of facilitating and completing the transaction;
- e. We share personal data in order to comply with applicable law, or payment method rules; to enforce our contractual rights; to protect the rights, privacy, safety and property of both tlamTechnologies, you and the law firms we work with; to respond to requests from courts and other public and government authorities.

5. How long will we keep your personal data

We are very careful about the personal information we store and we will not keep your information in a manner and form that identifies you for longer than is strictly necessary for the purposes set out in this Privacy policy or applicable law. There are certain instances where we are required to keep your information for a minimum period – for example under UK Tax law there is a seven-year period of retention for some personal data. Other instances include:

- a. foreign exchange transactions for 7 years for HMRC requirements;
- b. printed copies of your bank statements for the current and previous accounting year after which time we return these to you;

- c. copies of your bills which we raise and those which we print in order to process for the current and previous accounting year after which time we return these to you so that you can retain them for 7 years in total for HMRC requirements;
- d. printed copies of Legal Aid statements for the current and previous accounting year after which time we return these to you;
- e. printed copies of Legal Aid claims for two years after the completion of the case after which time we return these to you;
- f. contact details, bank account, salary, tax and pension details when providing outsourced payroll services for your employees for 7 years for HMRC requirements.

6. Where we keep your personal data

All our servers are located at Data Centres located in Oxford, United Kingdom. We might transfer and store the data we collect from you somewhere outside the United Kingdom and European Economic Area ('EEA'). People who work for us or our suppliers outside the EEA might also process your data. In such cases, we will ensure that we safeguard your privacy rights and that such transfers:

- a. Will only be made to recipients where the European Commission has issued an "adequacy decision" (this is a European Commission decision that confirms a country has adequate safeguards in place for the protection of personal data);
- b. Carried out under standard data protection contractual clauses that have been approved by the European Commission or by the adoption of EU-US Privacy Shield.

7. Confidentiality and security of personal data

We have a number of security measures in place designed to prevent data loss, to preserve data integrity, and to regulate our access to the data. We maintain technical, organizational and administrative measures (appropriate to the risk) to protect personal data within our organisation. Your personal data is only available to a limited number of personnel who need access to this information to perform their duties.

We regularly review our information collection, storage and processing practices to update our physical, technical and organisational security measures. However, whilst we use all reasonable

commercial endeavors to ensure your information remains secure, we cannot guarantee the security of the data transmitted to us. Any transmission over the internet is at your own risk.

We may suspend your use of all or part of the services without notice if we suspect or detect any breach of security. If you believe that your account or information is no longer secure, please notify us immediately at rco@tlam.co.uk

8. Your data subject rights

This section helps explain your data protection rights. To submit a Data Subject Access Request (“DSAR”) please email this link rco@tlam.co.uk. We may require you to verify your identity before we complete your request. **Please note** that if you opt-out of receiving marketing-related information emails from us, we may still send you important administrative messages as are required to provide you with our services.

Under the GDPR you have the right to:

- **Access** – You can ask us to verify whether we are processing personal data about you, and if so, to provide more specific information.
- **Correction** – You can ask us to correct our records if you believe they contain incorrect or incomplete information about you.
- **Erasure** – You can ask us to erase (delete) your personal data after you withdraw your consent to processing or when we no longer need it for the purpose for which it was originally collected.
- **Processing restrictions** – You can ask us to temporarily restrict our processing of your personal data if you contest its accuracy, prefer to restrict its use rather than having us erase it, or need us to preserve it for you to establish, exercise, or defend a legal claim. A temporary restriction may apply while verifying whether we have overriding legitimate grounds to process it. You can ask us to inform you before we lift a temporary processing restriction.
- **Data portability** – In some circumstances, where you have provided personal data to us, you can ask us to transmit that personal data (in a structured, commonly used, and machine-readable format) directly to another company if this is technically feasible.
- **Automated Individual Decision-making** – You can ask us to review any decisions made about you which we made solely based on automated processing, including profiling, that produced legal effects concerning you or similarly significantly affected you.
- **Right to Object to Direct Marketing including Profiling** – You can object to our use of your personal data for direct marketing purposes, including profiling. We may need to keep some minimal information (such as your email address) to comply with your request to cease marketing to you.
- **Right to Withdraw Consent** – You can withdraw consent that you have previously given to one or more specified purposes to process your personal data. This will not affect

the lawfulness of any processing carried out before you withdrew your consent. It may mean we are not able to provide certain products or services to you and we will inform you if this is the case.

We will not charge a fee for you to exercise any of these rights. However, we may charge a reasonable fee under certain circumstances for example where your request is clearly unfounded, repetitive or excessive. Your rights are subject to certain limitations prescribed by law. If you wish to receive information relating to another user, such as a copy of any messages you received from him or her through our service, the other user will have to contact our Data Protection Officer to provide their written consent before the information is released.

Further information about your rights can be found on the [ICO website](#).

9. Contacting the Regulator

In the event you have a complaint or are unhappy with the way in which we have dealt with your **DSAR** then you should contact the **ICO**. You can contact them on their [website](#), or by telephone on **0303 123 1113**.

10. Cookies

Our Site makes use of cookies. For more information on which cookies we use and how we use them. For more information see our Cookie Policy on our Site available at: <https://yourdomain.tlampay.com>.

11. Contact us

If you have any questions about how your personal data is used or collected please email us at rco@tlam.co.uk or by writing to us at tlam Technologies Limited, Third Floor, The Library Building, Tewkesbury GL20 5NX.

12. Privacy policy Changes

We may make changes to this Privacy policy from time to time. **We advise you** to refer back to this Privacy policy to review changes. We may also make changes as required to comply with changes in applicable law or regulatory requirements. We will notify you by email (where you have opted-in) of any significant changes.