



A COHORT PLC COMPANY

Privacy & Cookies Policy

ISSUE 1.0
3rd April 2019

A handwritten signature in black ink, appearing to be "Graham Beall".

Authorised by:

Graham Beall
Chess Technologies Group Managing Director

Change History

Version	Date	Comments
1.0	3 April 2019	Initial release

Privacy and Cookies

At Chess Technologies Ltd. (Chess), we take your privacy seriously and this privacy statement explains what personal data or information we collect from you and from people who visit our website and how we use it. We would encourage you to read the list below and click on 'learn more' if you would like more information on a specific topic.

We may change this information from time to time, so please check this page occasionally to ensure you're happy with any changes. This privacy statement was last updated on 3rd April 2019.

If you have any questions regarding this statement and our privacy practices, please contact us by email sales@chess-dynamics.com or by post at Chess Technologies Ltd., Quadrant House, North Heath Ind Est, North Heath Lane, Horsham, West Sussex, RH12 5QE. Alternatively, you can telephone us on +44 1403 249888.

CONTENTS

- **Who are we?**
- **What personal data or information do we collect?**
- **How is your personal data collected?**
- **How is your information used?**
- **Who has access to your information?**
- **Transfers outside of the European Economic Area**
- **Your choices & rights**
- **How you can update your information**
- **How you can access your personal information**
- **Keeping your data secure**
- **Use of cookies by this website**

Who are we?

Chess Technologies Limited is a registered company (06539922) our registered office address is 1 Waterside Drive, Arlington Business Park, Theale, Reading, RG7 4SW. The Chess Technologies Limited Group includes our Trading Subsidiaries, Chess Dynamics Limited, Vision4ce Limited and Chess Dynamics Inc. In this document, 'We', 'Us', 'Our' or the 'Group' includes Chess Technologies Limited and its trading subsidiaries as listed above.

Chess Dynamics Limited is a registered data controller (ZA239018).

What personal data or information do we collect?

The personal information we collect may include:

Identity Data	first name, last name, title, job title
Contact Data	billing/contact address, delivery address, email address, telephone numbers
Financial Data	bank account, billing and payment details

Contract Data	details about contract agreements or proposed agreements between us
Transaction Data	details about payments to and from you. Details of products and services you have purchased from us or supplied to us
Profile Data	purchases or orders made by you, feedback and survey responses
Technical Data	internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website
Usage Data	information about how you use our website, products and services
Marketing and Communications Data	your preferences in receiving marketing communications from us and/or our third parties, and your communication preferences

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, 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.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you 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). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

How is your personal data or information collected?

We may collect data or information about you when you:

- make an enquiry about our products, services or business activities of Chess Technologies Limited or our trading subsidiaries
- become a supplier to Chess Technologies Limited
- enquire about a job opportunity at Chess Technologies Limited or our trading subsidiaries
- use the Chess Technologies Limited website
- register to be sent an email news update or RNS alert from the Chess Technologies Limited website
- provide a business card or contact details in another form to one of our Chess Technologies Limited or trading subsidiary employees in person eg. at a meeting or event

How is your information used?

We collect your personal data or information to operate our business effectively and provide you with the best information on the products and services from across the Group.

We may use your information:

- To carry out our obligations arising from any contract or contract negotiations entered into by you or us as client or prospective client of Chess Technologies Limited our parent company Cohort plc or our Trading Subsidiaries
- To process an enquiry that you have made to us or our Trading Subsidiaries
- To contact you to discuss business opportunities or products and services from our Trading Subsidiaries that we believe may be of interest to you
- To send you communications that you have requested, for example our email news alert
- To process a job application
- To conduct the due diligence and negotiations required as part of a potential or actual business merger or acquisition
- To process our obligations associated with AIM Regulations and our shareholders of our Parent Company, Cohort plc.
- To invite you to events run by Chess Technologies Limited, our parent company Cohort plc and our Trading Subsidiaries

We believe that all these purposes are justified on the basis of our legitimate interests in running and promoting our business, the contractual obligations of our Trading Subsidiaries to deliver products and services to you, and our legal obligations as appropriate. We may also use your personal data to send you information, such as an email news update which you have signed up to receive and can opt-out from at any time.

Purpose / Activity	Type of data held	Length of time data held	How data held
As a client or agent of our Trading Subsidiaries	<ul style="list-style-type: none"> • Identity data • Contact data • Contract information • Financial information • Transaction data • Information and documents relating to the products / services we are providing, including communications with you • Your communications & marketing preferences 	6 years after expiry of contract	Business administration and communications systems held on secure UK servers
Prospective clients of our Trading Subsidiaries (for example during a bid or tender process)	<ul style="list-style-type: none"> • Identity data • Contact data • Contract information • Financial information • Information and documents relating to the products / services we are discussing, including communications with you 	The lesser of 6 years or when the warranty expires	Business administration and communications systems held on secure UK servers
Suppliers of products & services to Cohort plc (including Business Advisors)	<ul style="list-style-type: none"> • Identity data • Contact data • Contract information • Transaction data • Information and documents relating to the products / services you are providing, including communications with you 	6 years after expiry of contract	Business administration and communications systems held on secure UK servers

Current or prospective trade/commercial partners (eg. Business Advisors and Companies as part of an acquisition or merger)	<ul style="list-style-type: none"> • Identity data • Contact data • Names of Shareholders • Company Director details, including CVs & contracts • Commercial information, including supplier & customer contract details • Information and documents relating to negotiations including communications with Advisors 	As specified by the relevant Non-Disclosure Agreement	Business administration and communications systems held on secure UK servers
Website visitor	<ul style="list-style-type: none"> • Technical data • Usage data 	30 days	Google Analytics
Job Applicants	Please refer to our CANDIDATE PRIVACY POLICY (<i>link on recruitment web page</i>)		
Our Current and Former Staff	Please refer to our Staff Privacy Policy in the Chess Staff Handbook or contact recruitment@chess-dynamics.com		

Who has access to your information?

We do not sell or rent your personal data or information to any third party or share your information with third parties for their marketing purposes.

We will disclose your data or information if required by law, for example by a court order or for the prevention of fraud or other crime.

We may pass your information to our Trading Subsidiaries for the purposes of providing you with relevant information about their products and services, or to enable discussions about co-operative working for mutual benefit.

We may pass your information on to our third party service providers, professional advisors, agents or subcontractors for the purposes of completing a task or providing services to you on our behalf. Additionally to HM Revenue & Customs, regulators and other authorities acting as processors based in the United Kingdom who require reporting of processing activities in certain circumstances.

We disclose only the personal information necessary to deliver that service and have a contract in place that requires them to keep your information secure and not to use it for their own marketing purposes. When you are giving your personal data or information to the relevant third party this will be made very clear. They may then be acting as the data processor of your information for this purpose and therefore we advise you to read their Privacy Policy which will be clearly displayed at the point of data collection.

Transfers outside of the European Economic Area

Your personal data or information in the European Economic Area (EEA) is protected by data protection laws, but other countries do not necessarily protect your personal information in the same way. The EEA covers all countries in the EU plus Norway, Liechtenstein and Iceland. Some of the third party providers we use to help us manage our business and services may involve data transferring to the United States or other countries outside of the EEA.

We use the following third party online tools which may involve your data being processed outside of the EEA:

Google Analytics	Web Analytics	IP Address	LINK to Privacy Policy
------------------	---------------	------------	----------------------------------------

Your choices & rights

You have a choice about whether or not you receive marketing communications about the innovative products and services available from across our Group. We will not contact you for direct marketing purposes by post, email, phone or text message if you indicate to us that you wish to opt out of receiving such communications.

As an individual whose personal data is processed by Chess Technologies Limited or its trading subsidiaries, you have these rights

- The right to be informed, which is what this privacy policy is for

- The right to access the data we hold about you
- The right to object to direct marketing – either use the unsubscribe option or contact us directly
- The right to object to processing carried out on the basis of legitimate interests
- The right to erasure (in some circumstances)
- The right to data portability
- The right to have your data rectified if it is inaccurate
- The right to have your data restricted or blocked from processing

How you can update your information

The accuracy of your information is important to us. You can change your marketing preferences, unsubscribe or opt-out from receiving communications from us by contacting us at any time.

If you change your email address or if you want to update any of the information we hold on you, please email us sales@chess-dynamics.com or by post at Chess Technologies Ltd., Quadrant House, North Heath Ind Est, North Heath Lane, Horsham, West Sussex, RH12 5QE. Alternatively, you can telephone us on +44 1403 249888.

How you can access your personal information

You have the right to ask for a copy of the personal information Chess Technologies Limited or our trading subsidiaries hold relating to you. To do this please contact sales@chess-dynamics.com or by post at Chess Technologies Ltd., Quadrant House, North Heath Ind Est, North Heath Lane, Horsham, West Sussex, RH12 5QE. Alternatively, you can telephone us on +44 1403 249888.

You also have the right to lodge a complaint about our processing of your personal data with the UK's Information Commissioner's Office <https://ico.org.uk/>.

Keeping your data secure

When you give us personal information we take steps to ensure that it's treated securely and strive to protect it on our internal systems and our secure server systems encrypt your information.

Contacting us via social media

We do not currently use Social Media as a communication platform.

Contacting us via email

We use Transport Layer Security (TLS) to encrypt and protect email traffic in line with government. If your email service does not support TLS, you should be aware that any emails we send or receive may not be protected in transit.

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

Links to other websites

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

COOKIE POLICY

Use of cookies by this website

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site about aspects of your visit. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the website may become inaccessible or not function properly.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org.

To opt-out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>

The table below details every cookie used by this website.

Cookie	Name	Purpose	More information
Google Analytics	_gat _ga _gid	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.	ga is used to distinguish users and has an expiration of 2-years. _gid is used to distinguish users and has an expiration of 24-hours. _gat is used to throttle requests and has an expiration of 10-minutes.