

Effective: May 19th, 2018

The General Data Protection Regulation (GDPR), the new Data Protection Regulation, comes into force on May 25th 2018, with the aim of unifying and strengthening data protection for all EU citizens.

This Privacy Policy describes how Marllo Ltd collects, uses and discloses information, and what choices you have with respect to the information.

When we refer to “**Marllo Ltd**”, we mean the Marllo Ltd entity that acts as the controller or processor of your information, as explained in more detail in the “Identifying the Data Controller and Processor” section below.

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Applicability Of This Privacy Policy

This Privacy Policy applies to Marllo Ltd’s services and other interactions (e.g., customer service enquiries, etc.) you may have with Marllo Ltd (collectively “**Services**”). This Privacy Policy also applies to the Marllo Ltd’s website (www.marllo.co.uk). If you do not agree with the terms, do not access or use the Services or website.

A separate agreement governs delivery, access and use of Marllo Ltd’s Services (the “**Customer Agreement**”), including the processing of any messages, files or other content submitted through services accounts (collectively, “**Customer Data**”). The organisation (e.g., your employer or another entity or person) that entered into the Customer Agreement (“**Customer**”) controls their services (“**Account**”) and any associated Customer Data.

Information We Collect And Receive

Marllo Ltd may collect and receive Customer Data and other information and data ("**Other Information**") in a variety of ways:

Customer Data. Customers or individuals granted access to an account by a Customer ("**Authorised Users**") routinely submit Customer Data to Marllo Ltd when using the Services. This may include sensitive and confidential personal information.

Other Information. Marllo Ltd also collects, generates and/or receives Other Information such as:

1. **Account Information.** To create or update an Account, you or your Customer (e.g., your employer) supply Marllo Ltd with an email address, phone number, password, domain and/or similar account details, delivery and contact information, Company registration details and details around the service provision required. For details on Account creation, [click here](#) In addition, Customers that purchase Services provide Marllo Ltd (or its payment processors) with billing details such as credit card information, banking information and/or a billing address.
2. **Website Information.** Information about your use of our website including details of your visits such as pages viewed and the resources that you access. Such information includes traffic data, location data and other communication data. Information provided voluntarily by you. For example, when you register information or make a purchase
3. **Cookie Information.** Cookies provide information regarding the computer used by a visitor. Marllo Ltd. may use cookies where appropriate to gather information about your computer in order to assist us in improving our website. We may gather information about your general internet use by using the cookie. Where used, these cookies are downloaded to your computer and stored on the computer's hard drive. Such information will not identify you personally. It is statistical data. This statistical data does not identify any personal details whatsoever.
You can adjust the settings on your computer to decline any cookies if you wish. This can easily be done by activating the reject cookies setting on your computer.
Our advertisers may also use cookies, over which we have no control. Such cookies (if used) would be downloaded once you click on advertisements on our website.
4. **Additional Information Provided to Marllo Ltd.** We receive Other Information when submitted to our website or if you participate in a focus group, contest, activity or event, apply for a job, request support, interact with our social media accounts or otherwise communicate with Marllo Ltd.

Generally, no one is under a statutory or contractual obligation to provide any Customer Data or Other Information (collectively, "**Information**"). However, certain Information is collected automatically and, if some Information, such as Account setup details, is not provided, we may be unable to provide the Services.

How We Use Information

Customer Data will be used by Marllo Ltd in accordance with Customer's instructions, including any applicable terms in the Customer Agreement, and as required by applicable law. Marllo Ltd is a processor of Customer Data and Customer is the controller.

Marllo Ltd uses Other Information in furtherance of our legitimate interests in operating our Services, Websites and business. More specifically, Marllo Ltd uses Other Information:

To provide, update, maintain and protect our Services, Websites and business. This includes use of Other Information to support delivery of the Services under a Customer Agreement, prevent or address service errors, security or technical issues, analyse and monitor usage, trends and other activities or at an Authorised User's request.

As required by applicable law, legal process or regulation.

To communicate with you by responding to your requests, comments and questions. If you contact us, we may use your Other Information to respond.

To send emails and other communications. We may send you service, technical and other administrative emails, messages and other types of communications. We may also contact you to inform you about changes in our Services, our Services offerings, and important Services-related notices. These communications are considered part of the Services and you may not opt out of them. In addition, we sometimes send emails about new product features, promotional communications or other news about Marllo Ltd. These are marketing messages so you can control whether you receive them.

For billing, account management and other administrative matters. Marllo Ltd may need to contact you for invoicing, account management and similar reasons and we use account data to administer accounts and keep track of billing and payments.

If Information is aggregated or de-identified so it is no longer reasonably associated with an identified or identifiable natural person, Marllo Ltd may use it for any business purpose. To the extent Information is associated with an identified or identifiable natural person and is protected as personal data under applicable data protection law, it is referred to in this Privacy Policy as "**Personal Data**."

Lawful Basis

Marllo Ltd control and process data based on the following:

Consent – Consent is required and requested for processing sensitive data and when sending out information for marketing purposes.

Contract – Other information is processed because it is necessary for fulfilling a contract or because specific steps need to be taken before entering into a contract.

Data Retention

Marllo Ltd will retain Customer Data in accordance with a Customer's instructions, including any applicable terms in the Customer Agreement, and as required by applicable law.

Marllo Ltd may retain Other Information pertaining to you for as long as necessary for the purposes described in this Privacy Policy. This may include keeping your Other Information after

you have deactivated your account for the period of time needed for Marllo Ltd to pursue legitimate business interests, conduct audits, comply with (and demonstrate compliance with) legal obligations, resolve disputes and enforce our agreements.

Records are retained as specified by legal requirements, guidelines from the appropriate professional authorities or as defined in the service level agreement or contract. In absence of such guidance, the default storage of paper records is 3 years from creation.

Electronic records including Project Technical data and Images are stored indefinitely provided that future hardware and software systems are capable of accessing the data. The data may be printed to hardcopy if required.

Where no specific retention period is shown, the records are held for 6 years as live, after which they are archived on the server.

Paper records are disposed of by shredding **to ensure that confidentiality is maintained.**

How We Share And Disclose Information

This section describes how Marllo Ltd may share and disclose Information. Customers determine their own policies and practices for the sharing and disclosure of Information, and Marllo Ltd does not control how they or any other third parties choose to share or disclose Information.

Customer's Instructions. Marllo Ltd will solely share and disclose Customer Data in accordance with a Customer's instructions, including any applicable terms in the Customer Agreement, and in compliance with applicable law and legal process.

Third Party Service Providers and Partners. We may engage third party companies or individuals as service providers or business partners to process Other Information and support our business. These suppliers and other third parties are not authorised by us to use your Personal Data in any other way than in the delivery of Marllo Ltd. products and services.

During a Change to Marllo Ltd's Business. If Marllo Ltd engages in a merger, acquisition, bankruptcy, dissolution, reorganization, sale of some or all of Marllo Ltd's assets or stock, financing, public offering of securities, acquisition of all or a portion of our business, a similar transaction or proceeding, or steps in contemplation of such activities (e.g. due diligence), some or all Other Information may be shared or transferred, subject to standard confidentiality arrangements.

Aggregated or De-identified Data. We may disclose or use aggregated or de-identified Other Information for any purpose. For example, we may share aggregated or de-identified Other Information with prospects or partners for business or research purposes.

To Comply with Laws. If we receive a request for information, we may disclose Other Information if we reasonably believe disclosure is in accordance with or required by any applicable law, regulation or legal process.

To enforce our rights, prevent fraud, and for safety. To protect and defend the rights, property or safety of Marllo Ltd or third parties, including enforcing contracts or policies, or in connection with investigating and preventing fraud or security issues.

With Consent. Marllo Ltd may share Other Information with third parties when we have consent to do so.

Security

Marllo Ltd takes security of data very seriously. Marllo Ltd works hard to protect Other Information you provide from loss, misuse, and unauthorised access or disclosure. These steps take into account the sensitivity of the Other Information we collect, process and store, and the current state of technology. Given the nature of communications and information processing technology, Marllo Ltd cannot guarantee that Information, during transmission through the Internet or while stored on our systems or otherwise in our care, will be absolutely safe from intrusion by others. The Company does not accept responsibility for any loss arising from unauthorised access to, or interference with, any internet communications by any third-party, or from the transmission of any viruses.

Age Limitations

To the extent prohibited by applicable law, Marllo Ltd does not allow use of our Services and Websites by anyone younger than 16 years old. If you learn that anyone younger than 16 has unlawfully provided us with personal data, please contact us and we will take steps to delete such information.

Changes To This Privacy Policy

Marllo Ltd may change this Privacy Policy from time to time. Laws, regulations and industry standards evolve, which may make those changes necessary, or we may make changes to our business. We will post the changes to this page and encourage you to review our Privacy Policy to stay informed. If we make changes that materially alter your privacy rights, Marllo Ltd will provide additional notice, such as via email or through the Services. If you disagree with the changes to this Privacy Policy, you should deactivate your Services account. Contact the Customer if you wish to request the removal of Personal Data under their control.

Data Protection Officer

Our size and services provided mean that we do not require a designated onsite Data Protection Officer but if you have any concerns, please email info@marllo.co.uk

Identifying The Data Controller And Processor

Data protection law in certain jurisdictions differentiates between the “controller” and “processor” of information. In general, the Customer is the controller of Customer Data. In general, Marllo Ltd is the processor of Customer Data and the controller of Other Information.

Your Rights

Individuals located in certain countries, including the European Economic Area, have certain statutory rights in relation to their personal data. Subject to any exemptions provided by law, you may have the right to request access to Information, as well as to seek to update, delete, withdraw consent or correct this Information.

- To request a copy of any personal information held about you, email precise details of the request info@marllo.co.uk or write to Marllo Ltd, Unit 2 Imperial Park, Rawreth Lane Rayleigh Essex SS6 9RS. There will be a charge of £10 for this service.
- To update, delete, withdraw consent or correct your personal information, email precise details of the request to info@marllo.co.uk

To the extent that Marllo Ltd's processing of your Personal Data is subject to the General Data Protection Regulation, Marllo Ltd relies on its legitimate interests, described above, to process your data. Marllo Ltd may also process Other Information that constitutes your Personal Data for direct marketing purposes and you have a right to object to Marllo Ltd's use of your Personal Data for this purpose at any time. To do this email info@marllo.co.uk with the request.

Contacting Marllo Ltd

Please also feel free to contact Marllo Ltd if you have any questions about this Privacy Policy or Marllo Ltd's practices, or if you are seeking to exercise any of your statutory rights. You may contact us at info@marllo.co.uk or at our mailing address below:

Marllo Ltd, Unit 2 Imperial Park, Rawreth Lane, Rayleigh, Essex SS6 9RS
T: 0845 299 6900 E: info@marllo.co.uk

Contacting the ICO

If you believe there is a problem with the way Marllo Ltd is handling your data, individuals have the right to complain to the ICO.