

## Novus Guard – Privacy Policy

Novus Altair Limited (“we”, “us” or “our”) is a private limited company and registered in England and Wales with number 07303078 and with office address Suite 14, Roding House, 2 Cambridge Road, Barking, Essex, IG11 8NL

We are committed to protecting and respecting your privacy. We own and operate the “Novus Guard” downloadable mobile application (the “App”). You may download the App onto your mobile device (the “Device”).

This Privacy and Cookies Policy is used to inform visitors regarding our policies with the collection, use, and disclosure of their personal information, references to “you” are to any person who submits data to us or the App about him/herself or about any living individual in relation to use of the App or the services that are available through the App, or that we otherwise make available (the “Services”). When you access these Services, we may ask you to provide us with information about you.

This Privacy and Cookies Policy (along with our Terms and Conditions if you are using the App, and any other documents referred to in them) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Please read this Privacy and Cookies Policy carefully to understand our views and practices regarding your personal data and how we will treat it. The personal information that we collect is used for providing and improving the Service. We will only keep your personal data for as long as it is relevant to the purpose for which it was collected or for as long as we are required to keep it by law. We will not use or share your information with anyone except as described in this Privacy Policy.

For the purpose of the Data Protection Act 1998 (the “Act”), the data controller is Novus Altair Limited of Suite 14, First Floor, Roding House, 2 Cambridge Road, Barking, Essex, IG11 8NL, United Kingdom.

The terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, which is accessible on the Novus Altair website unless otherwise defined in this Privacy Policy.

## Information collection and use

This Privacy and Cookies Policy aims to give you information on how we collect and process your personal data through your use of the App, including any data you may provide through the App when you download the App and subscribe to use it in order to access the Services.

The app does use third party services that may collect information used to identify you. Link to privacy policy of third-party service providers used by the app:

Google Play Services - <https://www.google.com/policies/privacy>

Firebase Analytics - <https://firebase.google.com/policies/analytics>

Crashlytics - <http://try.crashlytics.com/terms/privacy-policy.pdf>

The App is not intended for children and we do not knowingly collect data relating to children.

The information that we request will be retained by us and used as described in this privacy policy. Hence, it is important that you read this Privacy and Cookies Policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

This Privacy and Cookies Policy supplements the other notices and is not intended to override them.

## Data controller

Novus Altair Limited is the controller and responsible for your personal data. We have appointed a data protection officer (“DPO”) who is responsible for overseeing questions in relation to this Privacy and Cookies Policy. If you have any questions about this Privacy and Cookies Policy, including any requests to exercise your legal rights (see paragraph 10, please contact DPO using the details set out below:

Full name of legal entity: Novus Altair Limited

Name or title of DPO: Adnan Niazi

Email address: [director@novusaltair.com](mailto:director@novusaltair.com)

Postal address: Suite 14, Roding House, 2 Cambridge Road, Barking, Essex, IG11 8NL

## Changes to this privacy and cookies policy and your duty to inform us of changes

This Privacy and Cookies Policy was last updated on **24/04/2019**.

Any changes we may make to this Privacy and Cookies Policy in the future will be posted on the App and, where appropriate, notified to you by email. Each time you enter the App, you agree that the Privacy and Cookies Policy current at that time shall apply to your use of the App and your provision to us of your personal data.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

# Log data

We want to inform you that whenever you use our service, in a case of an error in the app we collect data and information (through third party products) on your phone called Log Data. This Log Data may include information such as your device Internet Protocol (“IP”) address, device name, operating system version, the configuration of the app when utilizing our Service, the time and date of your use of the Service, and other statistics.

# Cookies

Cookies are files with a small amount of data that are commonly used as anonymous unique identifiers. These are sent to your browser from the websites that you visit and are stored on your device's internal memory.

This service does not use these “cookies” explicitly. However, the app may use third party code and libraries that use/s “cookies” to collect information and improve their services. You have the option to either accept or refuse these cookies and know when a cookie is being sent to your device. If you choose to refuse our cookies, you may not be able to use some portions of this.

# Third-party links

This App may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave the App, we encourage you to read the privacy notice of every application you visit.

# The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data includes:** first name, last name, username or similar identifier, and any licences and qualifications you may hold.
- **Contact Data includes:** address, email address and telephone numbers.

- **Transaction Data includes:** details about roles you have undertaken through your use of the App.
- **Additional Information includes:** education, criminal convictions, national insurance, marital status, nationality, physical record (such as: vision, sex, hair and eyes colour), GP information, service record, employment record, bank information (for payments)
- **Technical Data includes:** internet protocol (IP) address, your login data, time zone setting and location, browser plug-in types and versions, platform and other technology on the Device, the type of mobile device you use, a unique Device identifier (for example, your Device's IMEI number, the MAC address of the Device's wireless network interface, or the mobile phone number used by the Device), mobile network information, your mobile operating system and the type of mobile browser you use.
- **Profile Data includes:** your username and password, and your interests, preferences, feedback and survey responses.
- **Usage Data includes:** information about how you use the App and the Services, including traffic data, weblogs and other communication data.
- **Marketing and Communications Data includes:** your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Location Data** for the location of your Device when you access the App. This is not a permanent feature, and you will be asked to provide you consent before switching the feature on.
- **Camera Access.** This is not a permanent feature, and you will be asked to provide you consent before switching the feature on.
- **Microphone Access.** This is not a permanent feature, and you will be asked to provide you consent before switching the feature on.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity.

For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy and Cookies Policy.

We do not collect any Special Categories of Personal Data about you (this includes 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).

# 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 access to the App and the Services).

In this case, we may have to cancel your access to the App you have with us but we will notify you if this is the case at the time.

# How is your personal information collected?

Novus Altair Limited uses different methods to collect data from and about you including through:

- 1) **Direct interactions.** You may give us your Identity, Contact, Profile, and Marketing and Communications Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - a) Create an account on the App
  - b) Subscribe to our services
  - c) Contact us in any way
  - d) Request marketing to be sent to you
  - e) Respond to a survey
  - f) Give us some feedback
  
- 2) **Automated technologies or interactions.** As you interact with the App, we may automatically collect Technical Data, Usage Data and, where applicable, Location Data about your equipment, browsing actions and patterns.

We collect this personal data by using cookies, server logs and other similar technologies. Please see our paragraph 5 below for further details about our use of cookies.

- 3) **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:

Technical Data from the following parties:

- a) analytics providers such as Google Analytics, Mailchimp, Crashlytics and Crisp IM SARL
  
- b) Contact, Usage, Location and Transaction Data from providers of technical services such as Google Analytics, Google Cloud and Crisp IM SARL

- c) Identity and Contact Data from data brokers or aggregators such as Google Analytics, Google Cloud, Google Firebase, and Crisp IM SARL.

Identity and Contact Data from publicly available sources such as Companies House and the UK Electoral Register and Social Media Sources (Facebook, Twitter, Instagram, LinkedIn etc).

## How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where we have your consent, in respect of Location Data, Camera and Microphone Access.

See paragraph below to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message, or for use of Location Data, Camera and Microphone Access. You have the right to withdraw consent to marketing at any time by contacting us, or using the functionality available within the App.

## Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose or Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To register you as a new user of the App	(a) Identity (b) Contact (c) Profile	Performance of a contract with you
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p> <p>(c) Keeping in touch with you when you contact us</p>	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
To enable you to complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
To administer and protect our business and the App (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
To use data analytics to improve our App, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep the App updated and relevant, to develop our business and to inform our marketing strategy)

To provide you certain location-enabled services available within the App	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Location	On the basis of your consent provided within the App
To use the camera and microphone to provide a service available within the App	(a) Identity (b) Contact (c) Technical (d) Usage (e) Location*	On the basis of your consent provided within the App

## Change of purpose

Novus Altair Limited may use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## Cookies

The App use cookies. Cookies are tiny text files which identify your computer or device to our server as a unique user when you visit certain pages on the App and they are stored by your Internet browser on your Device's hard drive. Cookies can be used to recognise your Internet Protocol address, saving you time while you are on the App.

We only use cookies for your convenience in using the App and not for obtaining or using any other information about you (for example: targeted advertising). Your browser can be set to not accept cookies, but this would restrict your use of the App.

If you want to find out more information about cookies, go to <http://www.allaboutcookies.org> or to find out about removing them from your browser, go to <http://www.allaboutcookies.org/manage-cookies/index.html>.

Please note that we collect data from the App about use of the App using an analysis tool which uses cookies that are (able to be) used to generate pseudonyms for a user's profile. This means that use



cookies (which may be stored on your Device after you leave the App) can store information about your visit.

## Disclosure of personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph above.

- 1) Business partners, acting as independent controllers based in the UK, for the performance of any contract we enter into with you and/or them, including providers of roles available, and for which you can apply for, through the App.
- 2) Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- 3) HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- 4) The following service providers acting as processors who provide us with services:
  - a) Crisp IM SARL, whose services we use to capture lead and user information to create communication channels between our staff and those who secure employment through our service. Crisp IM SARL is based outside the EEA.
  - b) Mailchimp who is part of The Rocket Science Group LLC and whose services we use for sending and receiving email communications. They are based outside the EEA.
  - c) Google Cloud, whose services we use as our hosting platform, data storage provider and more. Google Cloud is based outside the EEA.
  - d) Google Analytics, whose services we use to track analytical data to improve our service. Google Analytics is based outside the EEA.
  - e) Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy and Cookies Policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

# International data transfer

We may transfer your personal data outside the European Economic Area (the “EEA”). Many of our external third parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## Data security

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. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

All information you provide to us is stored on our secure servers. We use industry standard security and firewalls on our servers. Where we have given you (or where you have chosen) a password which enables you to access certain Services, you are responsible for keeping that password confidential. We ask you not to share a password with anyone.

We value your trust in providing us your personal information, thus we are striving to use commercially acceptable means of protecting it. But remember that no method of transmission over the internet, or method of electronic storage is 100% secure and reliable, and we cannot guarantee its absolute security.

# Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We will keep the basic information about our App users (including Contact, Identity, Profile and Transaction Data) for at least a year after they cease being our employees. Otherwise, details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

In some circumstances you can ask us to delete your data: see paragraph below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

# Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see paragraph below for more information on these rights:

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent

If you wish to exercise any of the rights set out above, please contact us.

# No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

# What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

# Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally, it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

# Links to other sites

This Service may contain links to other sites. If you click on a third-party link, you will be directed to that site. Note that these external sites are not operated by us. Therefore, we strongly advise you to review the Privacy Policy of these websites. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

# Contact us

If you have any questions or suggestions about our Privacy Policy, do not hesitate to contact us by e-mail at: [Tech@NovusAltair.com](mailto:Tech@NovusAltair.com) or by post at: Suite 14, First Floor, Roding House, 2 Cambridge Road, Barking, Essex, IG11 8NL, United Kingdom.

# Glossary: lawful basis

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

**Consent** means processing your personal data on the basis that you have specifically authorised us to do so. You are able to withdraw your consent at any time.

## Glossary: your legal rights

You have the right to:

**Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.