

PRIVACY & COOKIES POLICY

We respect your privacy and are committed to protecting your personal data. In this policy, we explain how we collect and use your personal information when you access, download and/or use, our web-portal at onboarding.orta.co.uk and Orta.co.uk (“**Web-Portal**”) and/or our mobile application (the “**App**”)

Please note that links from the Web-Portal and the App may take you to external websites which are not operated by us or covered by this policy. We recommend that you check the privacy policies of such websites before submitting any personal information to them.

1. ABOUT US

The Web Portal and the App are operated by Orta Tech Limited (“**we**”, “**us**” and “**our**”). We are based at Clippers House, Clippers Quay, Salford Quays, M50 3XP and are the data controller for the purposes of the UK General Data Protection Regulation and the Data Protection Act 2018 (together the “**Data Protection Legislation**”).

So it is clear, if your use of the Web-Portal and/or the App is as a result of:

- your employer requiring you to use it as part of, or in order to undertake, your role, we shall share your personal data with your employer, and they are a separate independent data controller of your personal data; or
- you engaging separately with us for the purpose of you seeking opportunities to perform your services, we shall, where necessary, share your personal data with third parties looking to procure your services and such third parties shall be separate independent data controllers of your personal data.

If you have any questions about your privacy rights, or our use of your personal data, please [contact us](#).

WHAT PERSONAL INFORMATION DO WE COLLECT ABOUT YOU AND HOW DO WE COLLECT THAT PERSONAL INFORMATION?

We require you to provide your personal information if you wish to use the Web-Portal and/or the App. At all times, we will only require you to provide personal information to us where it is necessary for you to do so.

A. WHAT PERSONAL INFORMATION DO WE COLLECT ABOUT YOU?

We may collect personal information about you whenever you [contact us](#) or interact with us or use the Web-Portal or App. This information may include:

- **Contact & Identity Data:** such as your full name, username or similar identifier, date of birth, email address, gender, billing address and phone number.
- **Financial Data:** such as bank account or credit/debit card details.
- **Location Data:** such as your current location disclosed by GPS technology or other similar technologies.

- **Device Data:** such as the type of computer, tablet or 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, the type of mobile browser you use and time zone setting.
- **Content Data:** such as information stored on the device that you use to access the Web-Portal or the App which may include login information or photos, videos or other digital content and any personal information (about you or others) contained in the content that you upload to the Web-Portal or the App such as photographs, videos or other media. This includes any metadata associated with your content. Depending on the content that you upload on Web-Portal or the App, this may include Special Categories of Personal Data (see below).
- **Account & Usage Data:** such as your chosen username and details of your use of the Web-Portal or the App and including, but not limited to, the functions and facilities contained within the Web-Portal or the App that are used by you.

Special Categories of Personal Data

We do not directly collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, health, sexual orientation, political opinions, or any trade union membership). Nor do we directly collect any information about criminal convictions and offences. We encourage you to not provide any special category data to us directly when you contact us or via your account unless strictly necessary. Where you do provide any special category data to us, it will be assumed that you provide your consent for us to process it for the purposes for which it was provided by you.

Account

You understand that where you upload content or information to the Web-Portal or the App, this content or information will be used by us in order to provide a service to you and by us in order to improve the Web-Portal and the App and our business generally. Please do not upload any content or information when using the Web-Portal or the App that is confidential, that you do not want to be publicly available or visible, or that breaches the End User Licence Agreement.

Aggregated Data

We collect, use and share **Aggregated Data**, such as statistical data, for any purpose. Aggregated Data may be derived from your personal data, but it is not considered personal data under the Data Protection Legislation as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Account & Usage Data to calculate the percentage of users accessing a specific feature of the Web-Portal or the App or to derive certain insights based on the content and information uploaded to, or generated by, the Web-Portal or the App. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we will treat the combined data as personal data which will be used in accordance with this privacy & cookies policy.

If you do not provide Personal Data?

You are not required (by law or by any contract with us) to provide personal information to us. We will only require you to provide personal information to us where it is necessary for us to provide you with a service at your request.

If you fail to provide personal data when requested, we will not be able to provide access to the Web-Portal or the App.

B. HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

We have different methods of collecting personal data from and about you, including via:

- **Direct interactions between us:**

You may provide us with information (including Contact & Identity Data, Content Data, Financial Data, Account & Usage Data, Location Data) by contacting us:

- through the Web-Portal or the App;
- by email;
- when downloading the App;
- when registering for and using the Web-Portal or the App; or
- when you report an issue with the App.

- **Automated technologies and/or interactions**

As you interact with the Web-Portal or the App, we may automatically collect Device Data, Content Data and Account & Usage Data. This will be collated after using various 'cookies' and other similar technologies (as discussed below).

- **Location Data**

We also use GPS or other similar technologies to determine your current location. Some of our location-enabled services may require your personal data for the feature to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose. You can withdraw your consent at any time by disabling Location Data in your settings. If permission is not granted or location services are not enabled, functionality of the Web-Portal or the App may not be the same.

- **Third Parties or publicly available sources**

We may receive personal data about you from other sources, including for example, government databases and technical support companies.

2. HOW AND WHY DO WE USE YOUR PERSONAL INFORMATION?

We take data protection seriously and we will only use your personal data when the law allows us to do so.

Most commonly we will use your personal data in the following circumstances:

- Where we need to perform a contract we are about to enter into, or have entered into. When your employer requires you to access the Web-Portal or the App there is a contract between us and your employer. Where you have engaged us for the purposes of providing your services to third parties, there is a contract between us and you. In both instances we need to use your personal data in order to perform our side of the contract.
- 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. For example, using your information in this context is necessary so that we can improve the Web-Portal and/or the App and ensure that we provide you with the best user experience possible. This may include troubleshooting problems, analysing statistics, conducting research and tests and keeping the Web-Portal and the App secure.
- Where you have consented to the processing. We rely on your consent as a legal basis for processing your personal data in narrow situations, for example:
 - To install the App on your device;
 - Where you give us permission to access information that is stored on your device;
 - Where you upload content on to your account on the Web-Portal and/or the App that contains Special Category Personal Data (see above); and
 - To process your Location Data.

You can withdraw your consent for this type of processing at any time. Where you do withdraw your consent, please note that this may mean that the Web-Portal and the App, or some of its features, may no longer be available to you.

- Where we need to comply with a legal or regulatory obligation.

We have set out below, a description of all the ways we may use your personal data, and which of the legal bases we rely on to do so.

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 on which we are relying to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To install the App, to access the Web-Portal, to register you as a new user of the Web-Portal/App, to administer your account and/or to contact you about your account, as well as to respond to any support requests that you make.	(a) Contact & Identity (b) Account & Usage (c) Financial (d) Device	Consent Performance of a Contract Necessary for our legitimate interests (to develop our services)
To generate content and information on the Web-Portal/App on the basis of the content and information inserted/uploaded by you/any other party.	(a) Contact & Identity (b) Content (c) Account & Usage (d) Location (e) Device	Performance of a Contract Necessary for our legitimate interests (to provide our services)
To manage our relationship with you, including: (a) notifying you about changes to our terms or our privacy & cookies policy; and (b) asking you to leave a review or take a satisfaction survey	(a) Contact & Identity (b) Account & Usage	Performance of a Contract Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated and to study how individuals use the Web-Portal/App)
To administer and protect our business and the Web-Portal/App (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Contact & Identity (b) Content (c) Account & Usage (d) Location (e) Device	Necessary for our legitimate interests (for running our business, provision of our services, network security, to prevent fraud) Necessary to comply with a legal obligation
To deliver relevant content and information through the Web-Portal/App as well as advertisements to you and to measure or understand the effectiveness of the advertising we serve to you	(a) Contact & Identity (b) Content (c) Account & Usage (d) Location (e) Device	Necessary for our legitimate interests (to study how individuals use our services, to develop them, to grow our business and to inform our marketing strategy)

To use data analytics to improve our services and the Web-Portal/App	(a) Device (b) Account & Usage	Necessary for our legitimate interests (to keep the Web-Portal/App updated and relevant, and to develop and inform our commercial strategy)
To make suggestions and recommendations to you about products and/or services that may be of interest to you	(a) Contact & Identity (b) Device (c) Account & Usage (d) Content (e) Location	Necessary for our legitimate interests (to develop our services) Consent

Change of purpose

We will only use your personal information for the purposes for which we collected it, as set out above, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information 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 information without your knowledge or consent in compliance with the above rules, where this is required or permitted by law.

3. WHO ELSE DO WE SHARE YOUR PERSONAL INFORMATION WITH?

In addition to the parties set out in paragraph 1, who are independent data controllers of your personal data, we may also share your personal data with the parties set out below for the purposes set out in paragraph 3 above. The parties set out below will not use your information to contact you and selected third parties will be subject to obligations to process your personal information in compliance with the same safeguards that we deploy.

We may need to disclose your information to any one of the following:

- Third party service providers, for example: payment providers, telecommunications, IT and cloud computing systems, hosting providers etc. acting as processors whom we engage to deliver our services.
- HM Revenue & Customs, other regulators (such as the Information Commissioner's Office), and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Accountants, Solicitors, auditors, compliance consultants and other similar services based in the United Kingdom who require the reporting of processing activities in certain legal and compliance circumstances.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change in these circumstances occurs, your personal data will be used in the same way as set out within this privacy & cookies policy.

If you have any concerns about your personal information being shared, please [contact us](#) for more information.

There are certain exceptional circumstances in which we may disclose your information to other third parties. This would be where we believe that the disclosure is:

- Required by the law, or in order to comply with judicial proceedings, court orders or legal or regulatory proceedings.
- Necessary to protect the safety of our employees, our property or the public.
- Necessary for the prevention or detection of crime, including exchanging information with other companies or organisations for the purposes of fraud protection and credit risk reduction.

4. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

How long will we hold your personal data?

We will only retain your personal data for as long as we need it for the purposes for which it was collected (as set out in paragraph 3 above), as well as for any purposes necessary to satisfy any legal, accounting or reporting requirements.

By law we may have to keep basic information about our customers (which may include Contact & Identity Data and Financial Data) for 6 years after they cease being customers for tax purposes.

Where we do not need to retain basic information for legal reasons, the following will apply:

- If you create and maintain an account on the Web-Portal and/or the App, we will retain any information you provide to us (for example, at least for as long as you keep your account on the App and for a period of up to 12 months after you deactivate or delete your account).
- Where you contact us, but you do not have an account on the Web-Portal and/or the App and/or we don't have an ongoing relationship with you, we will retain your information for a period of 12 months, so that we can recognise you if you contact us again in the near future.

We may anonymise any of your personal data at some point, at which point it shall no longer be considered to be personal data.

If you would like us to delete your personal information before the end of these periods, please [contact us](#) but note that deleting such information may have a detrimental impact on the service we are able to provide to you.

5. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside of the United Kingdom.

6. HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy & cookies policy.

We try to ensure that all information you provide to us is transferred securely. Unfortunately, the transmission of information via the internet is not always completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data via the Web-Portal or the App; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

All information which you provide to us is stored on third party secure servers.

When you create a password to access the Web-Portal and/or the App, you are responsible for keeping that password confidential.

7. WHAT RIGHTS DO YOU HAVE IN RESPECT OF YOUR PERSONAL INFORMATION?

In accordance with the current Data Protection Legislation, you are entitled to a range of specific data subject rights that you may exercise under particular conditions, with a few exceptions.

Your right to ACCESS	You have the right to ask us to confirm whether or not we hold any of your personal data. If we do, you have the right to access a copy of your data, as well as information about how, and why, we use it. In order to prevent your data being disclosed to someone who is not authorised to access it, we may have to verify your identity before we provide you with a copy of the data that we hold.
Your right to RECTIFICATION	You have the right to have inaccurate or incomplete personal data that we hold about you rectified. This may involve providing a supplementary statement to the incomplete data.
Your right to ERASURE	Under certain circumstances, you have the have the right to have personal data erased. Also known as ‘the right to be forgotten’. This could be if: • The information is no longer needed for the original purpose for which we collected it. • You withdraw your consent for us to use the information (and we have no other legal reason to keep using it). • You object to us using your information and we have no overriding reason to keep using it. • We have used your information unlawfully. • We are subject to a legal requirement to delete your information. In those situations, you have the right to have your personal data deleted. If you believe that one of these situations applies to you, please contact us
Your right to RESTRICT PROCESSING	Under certain circumstances, you have the right to request the restriction or suppression of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: • If you want us to establish the data’s accuracy. • Where our use of the data is unlawful, but you do not want us to erase it. • Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend a legal claim. • You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
Your right to DATA PORTABILITY	Where your personal data is processed by automated means, you may have the right to obtain a copy of your personal data in a structured, commonly used and machine-readable format,

	and to ask us to transfer this data to another organisation in a safe and secure way.
Your right to OBJECT	You have the right to 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. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
Your right to be INFORMED	We have a legal obligation to provide you with concise, transparent, intelligible and easily accessible information about your personal information and our use of it. We have written this policy for that purpose, but please contact us if you require further information.
Your right to WITHDRAW CONSENT	You have the right to withdraw your consent at any time where we rely 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, you may not be able to access or use the Web-Portal/App or certain features of the Web-Portal/App.

8. COOKIES

The Web-Portal and the App use cookies to distinguish you from other users. This helps us to provide you with a good experience when you access and use the Web-Portal and/or the App.

What is a cookie?

A cookie is a piece of data stored locally on your electronic device or computer containing information about your activities on the Internet.

We use the following cookies:

- **Essential cookies.** These are cookies that are required for the operation of the Web-Portal and/or the App.
- **Marketing cookies.** These are used to recognise you when you return to the Web-Portal and/or the App. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region) as well as cookies that record your activities and features of the Web-Portal and/or the App that you use. We will use this information to make the Web-Portal and/or the App and any advertising displayed on it more relevant to your interests.
- **Analytical or performance cookies.** These allow us to recognise and count the number of users and to see how users move around the Web-Portal and/or the App when they are using it. This helps us to improve the way the Web-Portal and/or the App works, for example, by ensuring that users are finding what they are looking for easily.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie Name	Purpose
Session	Storage of the user's unique session ID to aid authentication across all requests on the application

Third parties may also use cookies, over which we have no control, and we shall have no liability for any third party cookies deployed on your electronic device or browser after following any links in/on the Web-Portal and/or the App.

If you block any or all cookies (including necessary cookies) you may not be able to access all or parts of the Web-Portal and/or the App.

If you have any concerns about the use of cookies on the Web-Portal and/or the App, please [contact us](#).

9. CHANGES TO OUR PRIVACY & COOKIES POLICY

Any changes we make to our privacy & cookies policy in the future will be posted on the Web-Portal and the App and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to this privacy & cookies policy.

This version was created in January 2025 and where they exist, historic versions can be obtained by contacting us.

10. COMPLAINTS

If you wish to make a complaint about our collection or use of your personal data, we ask that you please [contact us](#) in the first instance so that we may seek to resolve your complaint.

You have the right to lodge a complaint with the relevant supervisory authorities that oversee data protection law. In the UK, you may contact the [Information Commissioner's Office](#) if you wish to make a complaint.

11. CONTACT US

If you wish to speak to us regarding your privacy, or our use of your personal data, please contact us using the following details:

Full Name: Samantha Ellis

Post: CEO

Email: sam@orta.co.uk