

## Privacy Policy

KMsoft Limited respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you use our asset tracking and inventory management service, StockAssist (the "**Service**"). It will also tell you about your privacy rights and how the law protects you.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

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### Important information and who we are

We are KMsoft Limited. We are a company incorporated and registered in Scotland. Our company number is SC504562. Our registered address is 8-10 Corn Exchange Road, Stirling, Scotland, FK8 2HU.

When we refer to "**we**", "**us**" or "**our**" in this policy, we are referring to KMsoft Limited. We are the data 'controller' in relation to the personal data you provide to us, which means we determine the purposes and the way in which your personal data is, or will be, processed.

### Purpose of this privacy policy

This privacy policy aims to give you information on how we collect and process your personal data so that you can be confident when you interact with us that you know what your personal data is being used for and that it is being kept safe.

It is important that you read this privacy 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 policy supplements the other notices and is not intended to override them.

## Third-party links

You should be aware that our app may, from time to time, include links to third-party websites, plugins 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.

## How is your personal data collected?

We use different methods to collect and use data from and about you including through:

<b>Direct interactions</b>	You may give us your personal data by filling in forms or by corresponding with us in person, by email, by phone, by post or otherwise. This includes personal data you provide when signing up to use the Service and when you request marketing communications to be sent to you.
<b>Automated technologies or interactions</b>	<p>As you interact with our Service, we may automatically collect Technical Data about your computer or device, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.</p> <p>We collect personal data by using cookies and other similar technologies.</p>
<b>Third parties or publicly available sources</b>	We may receive personal data about you from various third parties and public sources. For example, analytics providers such as Google.

## Information we collect from 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 and process the following data about you:

<b>Sign-up Data:</b>	includes your name, email address and any other information provided at the time of registering to use our Service.
<b>Correspondence Data:</b>	if you contact us, we may keep a record of that correspondence.

<b>Technical Data:</b>	includes internet protocol (IP) address, other technical information from your mobile device or computer, your operating system, your activities on the Service and the details concerning the Internet browser and your browser plug-in types and version.
<b>Marketing and Communications Data:</b>	includes name, company name, email address, preferences in relation to receiving marketing materials from us.
<b>Survey Data:</b>	we may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
<b>Usage Data:</b>	means information on how you use the Service.

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.

## How do 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 have entered into with your employer (i.e. when you use our Service).
- Where we have your prior **consent** to use your personal data (e.g. where you have consented to sharing your login details in order to use the Service and to allow you to participate in interactive features of our Service).
- Where we need to comply with a **legal or regulatory obligation**.
- 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. 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](#).

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.

Please 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/activity	Type of data	Lawful basis for processing
To manage provision of the Service to you	Sign-up Data	Contract
To respond to queries received from individuals	Correspondence Data	Legitimate interests (to respond to assist our customers)  Consent
To administer and protect our business and Service (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Sign-up Data Technical Data	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)  Necessary to comply with our legal obligations
Capturing feedback from our users about our Service	Survey Data	Consent
To personalise our Service improve user experience	Usage Data Technical Data	Legitimate interests (to improve customer interactions)  Contract
To provide marketing materials to you regarding our business	Marketing/Communications Data Sign-up Data	Legitimate interests (to engage in sales and marketing to our user base)  Consent

## Disclosure of your information

We may have to share your personal information for the purposes set out above (please see [How do we use your personal data?](#)) with the following third parties:

Third party	Detail
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<b>Professional advisers:</b>	including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
<b>Authorities:</b>	including HMRC, regulators and other authorities who require reporting of processing activities in certain circumstances. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
<b>Service providers:</b>	including third parties who provide web hosting, metrics and analytics.
<b>Other parties:</b>	in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets. If KMsoft Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers/users will be one of the transferred assets.

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 transfers

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

- The country has been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see *European Commission: Adequacy of the protection of personal data in non-EU countries*.
- If we use certain service providers based out with the EEA, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see *European Commission: Model contracts for the transfer of personal data to third countries*.
- If 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*.
- In any other case, we will obtain your explicit consent before any transfer takes place.

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 in accordance with industry best practice 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.

All information you provide to us is stored on secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Service, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, no method of transmission of information via the internet is completely secure. However, we implement generally accepted industry standards so that we can do our best to protect your personal data.

## How long we store your personal data for

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.

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.

## Your rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please read the table below to find out more about these rights:

Your rights	What this means
<b>Access to your information</b>	You have the right to ask for a copy of the information which we hold on you (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.
<b>Correcting personal data</b>	<p>You have the right to request that we correct personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold corrected, though we may need to verify the accuracy of the new data that you provide to us.</p> <p>It is important that the personal data we hold about you is accurate and current, so please keep us informed if your personal data changes during your relationship with us.</p>
<b>Deleting personal data</b>	You may ask us to delete or remove personal data where there is no good reason for us continuing to process it. This is more commonly known as the 'right to be forgotten'. You also have the right to ask us to delete or remove

	<p>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.</p> <p>Please note, however, that we may not always be able to comply with your request to delete or remove personal data for specific legal reasons which will be notified to you, if applicable, at the time of your request.</p>
<b>Objecting to processing</b>	<p>You have the right to stop us processing your personal data for direct marketing purposes. We will always inform you if we intend to use your personal data for such purposes, or if we intend to disclose your information to any third party for such purposes. You can usually exercise your right to prevent such marketing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by <a href="#">contacting us</a>.</p> <p>You may also object to us processing 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.</p>
<b>Restriction of processing</b>	<p>This enables you to ask us to suspend the processing of your personal data in the following scenarios:</p> <ul style="list-style-type: none"> <li>• if you want us to establish the data's accuracy;</li> <li>• where our use of the data is unlawful but you do not want us to erase it;</li> <li>• 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</li> <li>• you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.</li> </ul>
<b>Transferring your personal data</b>	<p>In certain circumstances, you may 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.</p> <p>Please 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.</p>
<b>Withdrawing consent</b>	<p>Where we are relying on consent to process your personal data you can withdraw your consent at any time. Please note that this will not affect the lawfulness of any processing carried out before you withdraw your consent.</p>
<b>Review by an independent authority</b>	<p>You will always have the right to lodge a complaint with a supervisory body. The relevant authority in the UK is the Information Commissioner's Office. If you do have a complaint, we would appreciate the chance to deal with your</p>

	concerns before you approach the ICO, so please do contact us in the first instance if possible.
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## Contact us

Questions, comments and requests regarding this policy are welcomed and should be addressed to our Privacy Compliance Officer at [info@kmsoft.co.uk](mailto:info@kmsoft.co.uk).

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.