

Who We Are

Here are the details that the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regards to the processing of personal data and on the free movement of such data, known as General Data Protection Regulation (**GDPR**) and the UK Data Protection Act 2018 says we have to give you as a 'data controller':

- Our site address is www.cogendo.com
- Our company name is Cogendo Limited
- Our registered address is 51 West Street, Marlow, UK. SL7 2LS
- Our Data Protection Officer is Dr. Neil Bowers and he can be contacted at dpo@cogendo.com.

Cogendo is registered with the ICO. Our registration number is [ZA085928](#) and further details of the Data Protection register entry be found on the Information Commissioner's website here <http://www.ico.org.uk/>

In the following information, EU GDPR and UK GDPR is commonly referred to as GDPR.

What we may collect

We may collect and process the following data about you:

- Information you put into forms on our site at any time
- A record of any correspondence between us
- Details of visits to our site and the resources you use (this data is not personally identifiable)
- Information about your computer (e.g. your partial IP address, browser, operating system, etc.) for system administration and to report aggregate information for site improvements

Under GDPR and UK DPA we will ensure that your personal data is processed lawfully, fairly, and transparently, without adversely affecting your rights. We will only process your personal data if at least one of the following basis applies:

1. Processing is necessary for the performance of a contract to which you are a party or in order to take steps at the request of you prior to entering into a contract;
2. Processing is necessary for compliance with a legal obligation to which we are subject;
3. Processing is necessary to protect the vital interests of you or of another natural person;
4. Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; and/or
5. Processing is necessary for the purposes of the legitimate interests pursued by us , except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

If requesting a trial or demo, we may collect the following information:

- Name
- Contact information including email address
- Demographic information such as postcode, preferences and interests
- Other information relevant to customer surveys and/or offers

How we use what we collect

We use information about you for:

- Following up with you after you have requested a product demo or trial account.
- Internal record keeping

If you don't want us to use your personal data for any of the other reasons set out in this section, you can let us know at any time by contacting us at unsubscribe@cogendo.com, and we will delete your data from our systems.

Where we store your data

Your data will normally remain within the European Economic Area (EEA). If you have applied for a trial or demo, then your name and email address will be stored in our Customer Relationship Management system hosted in the EEA. The system we use for this is GDPR compliant, but it may transfer data to the U.S for storage.

By giving us your personal data, you agree to this arrangement. We will do what we reasonably can to keep your data secure.

We only keep your personal data for as long as we need to in order to use it as described in this policy, and/or for as long as we have your permission to keep it. In any event, we will conduct an annual review to ascertain whether we need to keep your personal data. Your personal data will be deleted if we no longer need it.

Disclosing your information

We are allowed to disclose your information in the following cases:

- If we want to sell our business, or our company, we can disclose it to the potential buyer.
- We can disclose it if we have a legal obligation to do so, or in order to protect other people's property, safety or rights.
- We can exchange information with others to protect against fraud or credit risks.

We may contract with third parties to supply services to us. These may include payment processing, search engine facilities and customer relationship management (CRM) services. In some cases, the third parties may require access to some or all of your data. These are the third parties that have access to your information:

- [Pipedrive](#) (our CRM) – only for trial or demo applicants
- Google Apps – as above, plus if you directly contact us via email

Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under GDPR and the law. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. We cannot ensure or warrant the security of any information you transmit to us, and you do so at your own risk

Your rights

You can ask us not to use your data for marketing. You can do this by contacting us at any time at unsubscribe@cogendo.com.

Under the GDPR, you have the right to:

- request access to, deletion of or correction of, your personal data held by us at no cost to you;
- request that your personal data be transferred to another person (data portability);
- be informed of what data processing is taking place;
- restrict processing;
- to object to processing of your personal data; and
- complain to a supervisory authority.

You also have rights with respect to automated decision-making and profiling as set out in section Automated Decision Making below (spoiler alert – we don't do any automated decision-making or profiling with your personal data).

To enforce any of the foregoing rights or if you have any other questions about our site or this Privacy Policy, please contact us at dpo@cogendo.com.

Representation for data subjects in the EU

We value your privacy and your rights as a data subject and have therefore appointed Prighter as our privacy representative and your point of contact for users of our site located in an EEA member state.

Prighter gives you an easy way to exercise your privacy-related rights (e.g. requests to access or erase personal data). If you want to contact us via our representative Prighter or make use of your data subject rights, please visit: <https://prighter.com/q/13833588>

Links to other sites

Please note that our terms and conditions and our policies will not apply to other websites that you get to via a link from our site. We have no control over how your data is collected, stored or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

Automated decision-making profiling

Personal data will not be used for automated decision making or profiling.

Dispute Resolution

The Parties will use their best efforts to negotiate in good faith and settle any dispute that may arise out of or relate to this Privacy Policy or any breach of it.

If any such dispute cannot be settled amicably through ordinary negotiations between the parties, or either or both is or are unwilling to engage in this process, either party may propose to the other in writing that structured negotiations be entered into with the assistance of a fully accredited mediator before resorting to litigation.

Within 14 days of the appointment of the mediator, the parties will meet with the mediator to agree the procedure to be adopted for the mediation, unless otherwise agreed between the parties and the mediator.

All negotiations connected with the relevant dispute(s) will be conducted in confidence and without prejudice to the rights of the parties in any further proceedings.

If the parties agree on a resolution of the dispute at mediation, the agreement shall be reduced to writing and, once signed by the duly authorised representatives of both parties, shall be final and binding on them.

If the parties fail to resolve the dispute(s) within 60 days (or such longer term as may be agreed between the parties) of the mediator being appointed, or if either party withdraws from the mediation procedure, then either party may exercise any right to seek a remedy through arbitration.

Any dispute shall not affect the parties' ongoing obligations under this Privacy Policy.