

Data Protection Declaration

Troika Systems Limited
9th July 2020

We take data protection seriously

1. We, Troika Systems Limited, inform you of the processing of personal data when using our English website (www.troika-systems.com), in this data protection declaration, specifically personal data and or information relating to an identified or identifiable person. This in particular includes information that allows conclusions to be drawn regarding your identity, for example your name, telephone number, address or email address.

Statistical data which we collect, for example when someone visits our website, that cannot be connected to an identified or identifiable person does not fall under the term of personal data.

2. Contact person and data processor

The contact person and person responsible for processing your data when visiting this website pursuant to the EU General Data Protection Regulation (GDPR) is:

Laurie GeldenHuys.
Managing Director
Troika Systems Limited
Unit 1, Blackworth Court
Blackworth Industrial Estate
Highworth
Wiltshire
SN6 7NS

Tel: + 44 (0) 1793 766355
Fax: + 44 (0) 1793 766356
E-Mail: laurie.geldenhuys@troika-systems.com

Should you have any questions on the subject of data protection in connection with the use of our website, please contact Laurie Geldenhuys at any time. He can be reached at the aforementioned postal address and email address (key word: attn. data protection officer).

3. Data processing on our website

Access data: Each time our website is used, we collect access data which your browser automatically transmits in order to allow you to visit the site. Access data in particular includes:

- IP address of the requesting device
- Date and time of the request
- Address of the website visited and the requesting website
- Information on the browser and operating system used
- Online identifiers (e.g. device identifiers, session IDs)

Processing this access data is required to allow you to visit the website and ensure the permanent functionality and security of our systems. Access data is also sometimes saved in internal log files for the aforementioned purposes in order to prepare statistical information on the use of our website, to continue to develop our website with regard to the use habits of our visitors (e.g. if the

proportion of mobile devices visiting the sites increases) and to generally manage our website. The legal basis is Art 6 Para.1 Sentence 1 lit. b GDPR.

The information saved in the log files do not allow for any conclusions about your person to be directly drawn. In particular, we only save your IP address in shortened, anonymised form. Log files are saved for 30 days and archived after subsequent anonymisation.

Contact: You have two options for getting in touch with us. This includes the contact form and contacting us by email. In this context, we process data only for the purpose of communicating with you. The legal basis is Art 6 Para.1 lit. b GDPR. Data we collect when you use the contact form is automatically deleted after your request has been fully processed unless we still require your request to meet contractual or legal obligations (see section “Storage period”).

4. Cookies and comparable technology for analysis purposes

In order to improve our website, we might use cookies and comparable technology (e.g. web beacons) in order to record and analyse general user behaviour based on access data. The legal basis for the data processing described in the section below is Art. 6 Para. 1 Sentence 1 lit. f GDPR based on our justified interest in designing and continuously optimising our website in line with our needs.

You may deactivate the option to save these cookies and delete the existent cookies at any time in your browser’s system settings. Furthermore, there are extensions/plugin-ins for browsers that prevent cookies being used. Every user may also view the website without cookies. If you do not accept any cookies, this can however lead to the functions of our website being limited.

In the following descriptions of the technologies we use, you can find information on rejection options with regard to our analysis measures by using what is known as an opt-out cookie. Please note that an opt-out cookie must be reset after you delete all cookies in your browser or if you use another browser and/or profile afterwards.

Use of Google Analytics with anonymisation function: This website uses Google Analytics, a web analysis service of Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (“Google”). Google Analytics uses cookies and similar technology to analyse and improve our website based on your user behaviour. Google can transfer data falling within this scope to a server in the US, where it is saved, for assessment. In the event that personal data is transferred to the US, Google is subject to the [EU-US Privacy Shield](#). Your IP address is however shortened before user statistics are assessed so that no conclusions may be drawn regarding your identity. For this purpose, Google Analytics was extended on our website by the code “anonymizeIP” in order to allow for IP addresses to be recorded anonymously.

Google will process information obtained via cookies to assess your use of the website in order to compile reports on website activities for the website operators and in order to render services associated with the website use and internet use.

As shown above, you can configure your browser so it rejects cookies or you can prevent data generated by cookies and related to your use of our website being recorded in the [cookie settings](#) of Google’s data protection declaration. Alternatively, you can also prevent Google processing your data by downloading and installing the [browser add-on](#) provided by Google (this does not work on mobile end devices).

You can find out more about this in Google Analytics’ [Data protection declaration](#).

5. Forwarding data

Generally, we may only forward data we collected if:

- you have given your explicit consent pursuant to Art. 6 Para. 1 Sentence 1 lit. a GDPR,
- forwarding this data is necessary pursuant to Art. 6 Para. 1 Sentence 1 lit. f GDPR in order to assert, exercise or defend legal claims and there is no reason to believe that you have an overriding interest, that is worth protecting, in stopping your data from being forwarded,
- we are legally obliged to forward this data pursuant to Art. 6 Para. 1 Sentence 1 lit. c GDPR or
- this is legally permissible and required pursuant to Art. 6 Para. 1 Sentence 1 lit. b GDPR in order to process contractual relationships with you or to carry out pre-contractual measures that are made at your request.

Our service providers may perform a part of data processing. In addition to the service providers mentioned in this data protection declaration, they may also in particular include computer centres that save our websites and databases, IT service providers that maintain our systems and consultancy firms. If we forward data to our service providers, they may only use the data to fulfil their tasks. We carefully select and commission our service providers. They are contractually bound by our instructions, have the suitable technical and organisational measures to protect the rights of the persons concerned and are regularly controlled by us.

Furthermore, your data may be forwarded in connection with official requests, court rulings and legal proceedings when required for prosecution or the enforcement of law.

6. Storage duration

Fundamentally speaking, we store your personal data only for as long as necessary to meet contractual or legal obligations for which we collected the data. We subsequently delete the data immediately unless we still require the data until the legal limitation period expires for evidence purposes for claims under civil law or due to legal storage obligations.

For evidence purposes, we must store contractual data for three years after the end of the year in which the contractual relationships with you end. Any claims lapse at the earliest possible time according to the standard legal limitation period.

We must also sometimes save your data after this period for accounting reasons. We are obliged to do so due to the legal documentation obligations that may arise from English Law, Credit Act, Money Laundering Act and Securities Trading Act. The periods for storing documentation included therein are two to ten years.

7. Your rights

You are entitled to request information about how we process your personal data at any time. In doing so, we will explain data processing to you and provide you with an overview of the data saved concerning your person.

If data we have saved is incorrect or no longer up-to-date, you have the right to have this data corrected.

You may also request that this data be deleted. Should, as an exception, deletion not be possible due to other legal provisions, the data will be blocked meaning that it will only be available for this legal purpose.

You may furthermore restrict the processing of your data, for example if you believe that the data we have saved is not correct. You are also entitled to the transferability of data, i.e. we will send you a digital copy of the personal data you provided upon request.

In order to be able to assert the rights described here, you may get in touch using the contact information above at any time. This also applies if you would like to receive copies of guarantees to prove an adequate level of data protection.

Furthermore, you have the right to reject data processing which is based on Art. 6 Para.1 lit. e or f GDPR. Lastly, you have the right to make a complaint to the data protection supervisory authorities responsible for us. You may assert this right with supervisory authorities in the member state of your place of residence, your place of work or the location of the suspected breach. In the UK it is the ICO.

Information Commissioner's Office (ICO), Wycliffe House Water Lane, Wilmslow, Cheshire, SK9 5AF
casework@ico.org.uk; Tel: 0303 123 1113; Monday to Friday, 9am to 4:30pm

8. Right of revocation and objection

Pursuant to Article 7 Para. 2 GDPR, you have the right to withdraw content you once granted us at any time. This means that we shall no longer continue to process data based on this content in future. By revoking consent, the legality of the processing that took place based on consent until the time of revocation is not affected.

If we process your data based on justified interests pursuant to Art. 6 Para. 1 Sentence 1 lit. f GDPR, you are entitled, pursuant to Art. 21 GDPR, to file an objection against your data being processed if there are reasons based on your particular situation or the objection is based on rejecting direct advertising. In the latter case, you have a general right of objection that we also implement without specifying reasons.

If you would like to make use of your right of revocation or objection, an informal communication sent to the contact details mentioned above shall be sufficient.

9. Security

We have taken technical and administrative security measures in order to protect your personal data from loss, destruction, manipulation and unauthorised access. All of our employees and service providers in our employ are bound by applicable data protection laws. Whenever we collect and process personal data, it is encrypted before being transferred. This means that your data cannot be abused by third parties. Our security measures are therefore subject to a constant improvement process and our data protection declarations are constantly being reviewed. Please ensure that you have the most recent version.

10. Amendments to this Data Protection Declaration

We retain the right to amend our data protection declarations if this should be necessary due to new technology. Please ensure that you have the most recent version. If fundamental changes are to be made to this Data Protection Declaration, we shall inform you of this on our website.