

OPENCORPORATES USER PRIVACY NOTICE

This version was last updated on 1st August 2023.

This Privacy notice contains important information about the information we collect through this site and through use of our services. It contains details of who we are, how and why we collect, store, use and share personal data together with your rights in relation to your personal data and how to contact us and supervisory authorities in the event you have a complaint. We ask that you read this carefully.

This privacy notice supplements other notices and privacy policies and is not intended to override them. The information that forms part of the OpenCorporates corporate data set (i.e. the database of information about companies, including their ownership and activities, that OpenCorporates makes available) is governed by our Public Records Privacy Policy which is available [here](#).

Contents

1. IMPORTANT INFORMATION AND WHO WE ARE	1
2. HOW TO COMPLAIN	1
3. THE DATA WE COLLECT ABOUT YOU	1
4. HOW YOUR PERSONAL DATA IS COLLECTED	3
5. HOW WE USE YOUR PERSONAL DATA	4
6. DISCLOSURES OF YOUR PERSONAL DATA	8
7. INTERNATIONAL TRANSFERS	9
8. DATA SECURITY	9
9. DATA RETENTION	10
10. YOUR LEGAL RIGHTS	10
11. GLOSSARY	11

1. IMPORTANT INFORMATION AND WHO WE ARE

Controller

OpenCorporates is a trading name of OpenCorporates Ltd, which is a company incorporated in England and Wales (Company Registration Number 07444723) ("we", "us" or "our" in this privacy notice). OpenCorporates is the controller and responsible for your personal data.

Contact us

If you have any questions about this privacy notice or our privacy practices, please contact our data privacy manager in the following ways:

- By Email: data.protection@opencorporates.com
- By Post: OpenCorporates Ltd, Aston House, Cornwall Avenue, London, N3 1LF, United Kingdom

If you wish to contact us for any other reason, we can be contacted:

- By Email: helpdesk@opencorporates.com
- By Post: OpenCorporates Ltd, Aston House, Cornwall Avenue, London, N3 1LF, United Kingdom

2. HOW TO COMPLAIN

We hope that our data team will be able to resolve any query or concern you raise about our use of your information. However, you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to this privacy notice

We keep this privacy notice under regular review. Historic versions can be obtained by contacting us.

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.

3. THE DATA WE COLLECT ABOUT YOU

Personal data means any information that relates to an individual that can be identified. It does not include data where it is not possible to identify the person to whom that data relates (anonymous data).

In the course of operating this website and providing services, we collect the following personal data about you.

Information you give us

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

- **Identity Data** includes first name, last name, social media handles (Twitter/LinkedIn, etc. if you used this for sign up).
- **Contact Data** includes email address and, if a paid for account may collect data such as, billing address, and telephone numbers.
- **Financial Data** includes payment card details.
- **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases made by you, feedback and survey responses.
- **Usage Data** includes information about how you use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We also collect, use and share Aggregated Data such as statistical data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data with usage data from other users to calculate the percentage of users accessing a specific website feature. However,

Aggregated Data combined or connected with other data can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

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). Nor do we collect any information about criminal convictions and offences.

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 services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

4. HOW YOUR PERSONAL DATA IS COLLECTED

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

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, email or otherwise. This includes personal data you provide when you:
 - create an account on our website;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a survey; or
 - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical 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 [cookie policy](#) for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
 - (a) Technical Data from the following parties: analytics providers such as Google based outside the UK;

- (b) Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Striped based outside the UK.

5. 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 obligation.

[Click here](#) 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 although we will get your consent before sending direct marketing communications to you via email or text message. You have the right to withdraw consent to direct marketing communications at any time by clicking on the 'Unsubscribe' link on the bottom of all of our Marketing Emails.

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.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new user	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver paid for services including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Usage (f) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy notice (b) Asking you to provide feedback or take a survey (c) Notifying you if your use of our services is in breach of the terms of use	(a) Identity (b) Contact (c) Profile (d) Usage Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated, ensure usage is compliant with our terms and conditions and to study how customers use our services)

To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting, hosting of data and monitoring and reporting any non-compliance with the terms of use)	(a) Identity (b) Contact (c) Technical (d) Usage	(a) Necessary for our legitimate interests (for running our business, ensuring users comply with the terms of use, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

To make suggestions and recommendations to you about our services, events (including those of selected third parties), developments in our services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)
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Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences **or** by following the opt-out links on any marketing message sent to you.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of services purchased, service experience or other transactions.

Cookies

This website uses cookies to improve your experience while you navigate through the website. Out of these cookies, the cookies that are categorised as necessary are stored on your browser as they are essential for the working of basic functionalities of the website.

We also use third-party cookies that help us analyse and understand how you use this website, to store user preferences and provide them with content and advertisements that are relevant to you. These

cookies will only be stored on your browser with your consent to do so. You also have the option to opt-out of these cookies but opting out of some of these cookies may have an effect on your browsing experience.

Change of purpose

We will only 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.

6. DISCLOSURES OF YOUR PERSONAL DATA

We will only share your personal information in the following circumstances:

- where you have given us permission to do so;
- where we have identified a breach of our terms of use and such disclosure is reasonably necessary to prevent or restrain on-going breach (e.g. by notifying your employer that you are using our services in breach of our terms of use, or by notifying a regulatory or law enforcement authority of a breach of our terms of use);
- with third parties who work with us and need it in order to provide our services to you (e.g. payment processors, help-desk support providers, email service providers, etc.)
 - Note that we use Stripe to process payments and pass your personal data to them in order to process any payments from you. Their privacy notice is available here (<https://stripe.com/en-gb/privacy>);
- with 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 notice; and

- when required to do so by applicable law.

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.

We will not otherwise share your personal information with a third party.

7. INTERNATIONAL TRANSFERS

Many of our external third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.

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

- The country to which we transfer your data has been deemed to provide an adequate level of protection for personal data and/or
- We have put in place specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

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

8. DATA SECURITY

We have appropriate security measures in place to prevent personal information from being accidentally lost, or 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 genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

9. DATA RETENTION

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

10. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.. In summary, those include rights to:

- [Request access to your personal data.](#)
- [Request correction to any personal data we hold about you.](#)
- [Request the erasure of your personal data.](#)
- [Object to processing of your personal data.](#)
- [Request restriction of processing your personal data.](#)
- [Right to withdraw consent.](#)

If you would like to exercise any of those rights, please email us at data.protection@opencorporates.com.

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 could refuse to comply with your request in these circumstances.

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.

We try to respond to all legitimate requests within one month. Occasionally it could 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.

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

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:

- 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 legal claims.
- 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.