This privacy notice describes the privacy practices for Okapi Solutions (the "Site"), located at <a href="https://www.okapi-solutions.com">www.okapi-solutions.com</a>. Okapi Solutions Ltd. owns and operates this Site.

#### 1 Privacy Notice

#### 1.1 Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

"Any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person."

#### 1.2 How we use your information

This privacy notice tells you how we, Okapi Solutions Limited, will collect and use your personal data for [outline further information on services and activities that you collect personal data, for example: cookies, profiling, complaints, subscriptions, etc.)]

# 1.3 Why does Okapi Solutions Limited need to collect and store personal data?

In order for us to provide you with any of our services we may need to collect personal data for the purposes correspondence and/or detailed service provision. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

In terms of being contacted for marketing purposes Okapi Solutions Limited will contact you again to seek your explicit consent.

#### 1.4 Will Okapi Solutions Limited share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to Okapi Solutions Limited in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with Okapi Solutions Limited's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

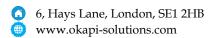
#### 1.5 Disclosure

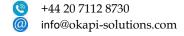
We may pass on your personal information where we have a legal obligation to do so, or if we have to enforce or apply our terms of use, contracts or other agreements.

## 1.6 How will Okapi Solutions Limited use the personal data it collects about me?

Okapi Solutions Limited will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep







your information accurate and up to date, and not keep it for longer than is necessary. Okapi Solutions Limited is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data will be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

#### 1.7 Data Transmission

Generally, the transmission of information over the internet is not completely secure, and we can't guarantee the security of your data. Any data you transmit is therefore at your own risk.

We have procedures and security features in place to ensure we keep your data secure once we receive it.

#### 1.8 Under what circumstances will Okapi Solutions Limited contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

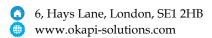
#### 1.9 Can I find out the personal data that the organisation holds about me?

You can find out what information we hold about you, request that data we hold about you requires modification, ask us not to use any of the information we collect, or ask us to restrict how we and/or any associated 3<sup>rd</sup>-parties process your data.

Okapi Solutions Limited, at your request, can confirm what information we hold about you and how it is processed. If Okapi Solutions Limited does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Okapi Solutions Limited or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged





to provide the personal data and the possible consequences of failing to provide such data.

- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

To do this, please write in the first instance to:

The Data Protection Officer Okapi Solutions Limited 6 Hays Lane London Bridge London SE1 2HB United Kingdom

You can also email us at: <u>DPO@okapi-solutions.com</u>. We will respond within 30 days of the receipt of your request.

#### 1.10 What forms of ID will I need to provide in order to access this?

Okapi Solutions Limited accepts the following forms of ID when information on your personal data is requested:

- Passport
- Diving Licence
- Birth Certificate
- Utility Bill (within last 3 months)

Copies of ID documents supplied in this regard will be disposed of immediately once Okapi Solutions are satisfied with your identification.

#### 2 Data Protection Officer / GDPR Owner & Data Controller

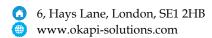
#### 2.1 Contact details of the Data Protection Officer / GDPR Owner

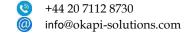
The Data Protection Officer Okapi Solutions Limited 6 Hays Lane London Bridge London SE1 2HB United Kingdom

Telephone: +44 20 7112 8730

You can also email us at: <u>DPO@okapi-solutions.com</u>. We will respond within 30 days of the receipt of your request.







#### 2.2 Data Controller

Okapi Solutions Ltd is the Data Controller for Okapi Solutions under the Data Protection Act 1998 ('the DPA'). We will process your data in accordance with the DPA. The purpose of the privacy policy is to inform you as a user of Okapi Solutions about what information we collect when you access any of our services, how we use your information, whether the information is disclosed to others and the ways in which we protect users' privacy.

#### 3 Where Your Data Is Stored

We store your data on our secure systems in the UK.

#### 4 Your Rights as a Data Subject

At any point while we are in possession of, or processing your personal data, you, the data subject, have the following rights:

#### 4.1 Right Of Access

You have the right to request a copy of the information that we hold about you.

#### 4.2 Right Of Rectification

You have a right to correct data that we hold about you that is inaccurate or incomplete.

#### 4.3 Right To Be Forgotten

In certain circumstances you can ask for the data we hold about you to be erased from our records.

#### 4.4 Right To Restriction Of Processing

Where certain conditions apply, you have a right to request Okapi Solutions restrict the processing of your data.

#### 4.5 Right Of Portability

You have the right to have the data we hold about you transferred to another organisation.

#### 4.6 Right To Object

You have the right to object to certain types of processing such as direct marketing.

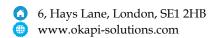
#### 4.7 Right To Object To Automated Processing, Including Profiling

You also have the right to be subject to the legal effects of automated processing or profiling.

#### 4.8 Right To Judicial Review

In the event that Okapi Solutions Limited refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined below.





#### 4.9 Right to Complain

In the event that you wish to make a complaint about how your personal data is being processed by Okapi Solutions Limited (or third parties as described above), or how your complaint has been handled, you have the right to lodge a complaint directly with the Supervisory Authority below and Okapi Solutions Limited's Data Protection Officer / GDPR Owner.

#### 4.10 Supervisory Authority

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.

Other contact details: https://ico.org.uk/global/contact-us/postal-addresses/

By Email: <a href="https://ico.org.uk/global/contact-us/email/">https://ico.org.uk/global/contact-us/email/</a>

#### 5 What Personal Data Do We Collect?

We want you to feel secure when using the website and associated services. We are committed to respecting your privacy. Below we give an overview of how we do that.

#### 5.1 The personal data we collect will be used for the following purposes

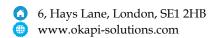
We collect certain information or data about you when you use <u>www.okapi-solutions.com</u>. This includes:

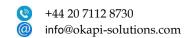
- (a) questions, queries or feedback you leave, including your email address if you send an email to Okapi Solutions;
- (b) your IP address, and details of which version of web browser you used;
- (c) information on how you use the site, using cookies and page tagging techniques to help us improve the website;
- (d) details that may allow you to access Okapi Solutions' services and transactions, e.g., an email address. You'll always be told when this information is being collected, and your data will only be used for the purpose(s) you provided it for.

#### This helps us to:

- (a) improve the site by monitoring how you use it;
- (b) respond to any feedback you send us, if you've asked us to;
- (c) provide you with information about our services where requested;







#### 5.2 Our legal basis for processing your personal data

Though there are now six available lawful bases for processing personal data, the legal bases that Okapi Solutions has identified as available to it and upon which it may rely in order to process personal data include:

#### 5.2.1 Consent

- Where you have contacted us to request we do something before entering into a contract;
- Where you have explicitly opted in to receive information about specific products, services and communications we offer.

#### 5.2.2 Contract

- Where processing is necessary to for the performance of a contract to which we are both a party:
- Where processing is necessary to fulfil our contractual obligations to you.

#### 5.2.3 Legitimate Interest

 For the purposes of the legitimate interests pursued by Okapi Solutions as Data Controller;

On each occasion we collect personal data from you we will identify the scope and extent of the data, for what purposes we are collecting the data, how long we will retain the data and what will happen to the data once the specific purposes for its collection have ended.

#### 5.3 Navigation data

The IP address and the website you came from. We will never share personal information with any third parties without your consent. Navigation data is shared with trusted, approved third parties providing analytics or advertising.

#### 5.4 Personal information

This may include your first name, last name, email address, postcode and any other personal information you provide to us.

#### 5.5 Third-Party Links

The Okapi Solutions website contains links to other websites. This privacy policy only applies to this website and to the organisations to which we have an agreed, direct link. However, it does not apply to other websites that link to us without our express agreement or knowledge.

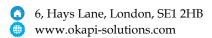
#### 5.6 Following a link to another website

If you go to another website from this one, please also read that website's privacy policy to find out what it does with your information.

#### 5.7 Following a link to Okapi Solutions from another website

If you come to Okapi Solutions from another website, we may receive personal information about you from that other website. You should read the privacy policy of the website you came from to find out more about this.





#### 6 Use of Personal Data

#### 6.1 Data Sharing

Okapi Solutions' policy is to not share any personal data with 3<sup>rd</sup>-parties, other associated organisations or individual associates unless:

- i. you have specifically consented to such sharing of your data;
- ii. the data processing is required to comply with our legal obligations;
- iii. it is required for the performance of any contract between you and Okapi Solutions;
- iv. we have a legitimate interest to process your data in this way.

#### 6.2 Analytics

Uses navigation data in services provided by Okapi Solutions and related third parties. For more information see our **Error! Reference source not found.**.

#### 6.3 Personalisation

Okapi Solutions does not use navigation data or personal information to enable us, or third parties, to tailor any of the services we provide to you. Where our use of your data may change to enable personalisation of services, you will be informed prior to the change occurring and your express reconsent will be sought to the change of service / usage.

#### 7 How We Collect Data

#### 7.1 Directly

We collect information directly from you in a number of ways. This includes the data you give us when entering into a contract with us or signing up to any of our products and services.

We also collect information when you give it to us. When we collect this type of information, we will inform you as to why we are asking for information and how this information will be used. It is completely up to you whether you provide it, but not providing information may affect our ability to provide services to you.

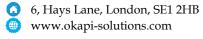
#### 7.2 Cookies

Cookies are small text files of information that save and retrieve information about your visit to our site, such as how you entered our site, how you navigated through the site and what information was of interest to you. This information is collected for a number of reasons, for example, to help improve your website experience and related services.

The cookies we use merely identify you as a number but it may be possible, via additional processing, for this information to be used to identify you personally. If you are uncomfortable about the use of cookies, you can disable them, or block specific cookies, by changing the settings in the preferences or options menu in your internet browser. Disabling all cookies may affect our ability to provide services to you; if certain cookies are disabled you may not be able to access the service.

See our Error! Reference source not found. for more information on the cookies we use.





#### 7.3 Social Media

The social media bookmarking sites that Okapi Solutions links to are third-party sites and Okapi Solutions does not control the way these sites use your information. If you choose to access these sites using the links provided, the operators of these sites may collect information from you that may be used by them in accordance with their privacy policies, which may differ from ours. You should read their privacy policies carefully to find out what happens to any information that is collected by these services when you use them.

Okapi Solutions currently includes links to the following social media services:

- LinkedIn
- Twitter
- Google

#### 7.4 Videos

Videos on <u>www.okapi-solutions.com</u> – whether viewed on the website, in emails or embedded in third-party sites – are supplied (streamed) to users by third-party companies.

#### 7.5 LinkedIn

Okapi Solutions' website — <a href="www.okapi-solutions.com">www.okapi-solutions.com</a> — includes links to the business networking website <a href="LinkedIn.com">LinkedIn.com</a> and Okapi Solutions own LinkedIn page. Information submitted as a part of Okapi Solutions content held on LinkedIn will be subject to their privacy policies (also, in this regard, see the

EU-US Privacy Shield Legislation). For more information, see the LinkedIn Privacy Policy.

#### 7.6 Twitter

Information submitted as a part of Okapi Solutions content held on Twitter will be subject to their privacy policies (also, in this regard, see the <u>EU-US Privacy Shield Legislation</u>). For more information, see the <u>Twitter Privacy Policy</u>.

#### 7.7 Google

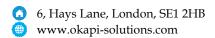
Okapi Solutions uses Google Maps APIs where location-based information is required. You should read the <u>Google Privacy Policy</u> to understand how this affects you.

#### 7.8 How long do we hold your information?

We will hold your information for as long as we are providing our services to you. If you do not access the services provided by Okapi Solutions, for instance, open or click through one of the emails for more than a 12 months, we will send you an email asking you to confirm that you wish to continue receiving Okapi Solutions emails. If you do not respond to this email within one month we will unsubscribe you.

We will remove all personal information we hold relating to you, which you registered with us, within six months of you unsubscribing, or being unsubscribed, from Okapi Solutions services. We will hold this information for a further six months following unsubscription, as we may need to use it for statistical analysis, to comply with contractual or other obligations, or if you choose to





resubscribe within that period. However, once you unsubscribe you will not receive further information from us.

You also have the right to request that we remove all your personal data from our systems. To do this, please write in the first instance to:

The Data Controller
Okapi Solutions Limited
6 Hays Lane
London Bridge
London
SE1 2HB
United Kingdom

You can also email us at: <a href="mailto:DPO@okapi-solutions.com">DPO@okapi-solutions.com</a>.

We will respond within 30 days of the receipt of your request.



