

## **1. Introduction**

1.1 Committed to safeguarding the privacy of our website visitors and service users; in this policy we explain how we will handle your personal data.

1.2 By using our website and/or our polygraph services and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

1.3 Our website incorporates privacy controls which affect how we will process your personal data. By using the privacy controls, you can specify whether you would like to receive direct marketing communications and limit the publication of your information

## **2. How we use your personal data**

2.1 In this Section 2 we have set out:

- (a) The general categories of personal data that we may process;
- (b) In the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
- (c) The purposes for which we may process personal data; and
- (d) The legal basis of the processing.

2.2 We may process data about your use of our website and services (“usage data”). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legal right to monitor and improve our website and services.

2.3 We may process your account data (“account data”). The account data may include your name and email address. The source of the account data is you. The account data may be processed for the purposes of operating our website, providing our services (including providing you with polygraph results), ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is consent and our legal right to properly administrate our website and business together with the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

2.4 We may process your information included in your personal profile on our website (“profile data”). The profile data may include your name, address, telephone number, email address, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details and employment details and other lifestyle related data. The profile data may be processed for the purposes of enabling and monitoring your use of our website and services. The legal basis for this processing is consent and our legitimate interest, namely the proper administration of our website and business and the performance of a contract between you and us and/or taking steps, at you request, to enter into such a contract.

2.5 We may process your personal data that is provided in the course of the use of

our services (“service data”). The service data may include your name, address, telephone number, email address, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details and employment details and other lifestyle related data. The source of the service data is you. The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is consent and our legitimate interest, namely the proper administration of our website and business and the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

2.6 We may process information relating to transactions, including purchases of goods and services that you enter into with us and/or through our website (“transaction data”). The transaction data may include your contact details, your card details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interest, namely our interest in the proper administration of our website and business.

2.7 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters (“notification data”). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent.

2.8 We may process information contained in or relating to any communication that you send to us (“correspondence data”). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

2.9 We may process any of your personal data identified in the other provisions of this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

2.10 In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

2.11 Please do not supply any other person’s personal data to us.

### **3. Providing your personal data to others**

3.1 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing

legal disputes.

3.2 We may disclose your personal data to our suppliers or subcontractors insofar as reasonably necessary for performance of the contract between you and us.

3.3 Financial transactions relating to our website and services may be handled by our payment services providers. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds.

3.4 In addition to the specific disclosures of personal data set out in this Section 3, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

#### **4. Retaining and deleting personal data**

4.1 This Section 4 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

4.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary (and no more than six years in any event).

4.3 Notwithstanding the other provisions of this Section 4, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

#### **5. Amendments**

5.1 We may update this policy from time to time by publishing a new version on our website.

5.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

5.3 We may notify you of changes to this policy by email

#### **6. Your rights**

6.1 In this Section 6, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

6.2 Your principal rights under data protection law are:

- (a) The right to access;
- (b) The right to rectification;
- (c) The right to erasure;
- (d) The right to restrict processing;
- (e) The right to object to processing;
- (f) The right to data portability;
- (g) The right to complain to a supervisory authority; and
- (h) The right to withdraw consent.

6.3 If you state on the Consent Form at the outset of your instructions to us, that you wish for your test data to be removed on conclusion of our work for you, then on production of the results obtained in report form, we shall automatically delete all data obtained with the exception of the polygraph results report which we will retain in accordance with our APA (American Polygraph Association) terms of membership for one year. If you do not state you wish for your test data to be removed on the Consent Form, all data relating to video, voice recordings and charts we hold on you will automatically be deleted 24 hours from the production of the report. If you state on the Consent Form that the video and voice recording are to be used as evidence in a court, tribunal or for any other legal purpose we will retain your data for a maximum of one year. During this time the video and voice recording remains the property of Lie Detector Test UK, however if you have asked for the video to be kept during you pre-test interview, this can be viewed with an examiner in a controlled office location on an agreed date, subject to covering our costs, or unless requested by a legal body. The video and test data needs to be interpreted by our examiner and would not be released without the above terms. You must advise your examiner at the time of your pre-examination interview or such recordings will be deleted within 24 hours.

You have the right to confirmation whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

6.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

6.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed; you withdraw consent to consent-based processing; the processing is for direct marketing purposes; and the personal data has been unlawfully processed. However, there are certain general exclusions of the right to erasure. Those general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims

6.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

6.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried

out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

6.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

6.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

6.10 To the extent that the legal basis for our processing of your personal data is consent, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

6.11 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

6.12 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

6.13 You may exercise any of your rights in relation to your personal data [by written notice to us.

## **7. About cookies**

7.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

7.2 Cookies may be either “persistent” cookies or “session” cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

7.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

## **8. Cookies that we use**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is

transferred to your computer's hard drive.

We use the following cookies:

**Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.

**Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

**Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

**Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

## **9. Cookies used by our service providers**

9.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

9.2 We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>

## **10. Managing cookies**

10.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via your browser support.

10.2 Blocking all cookies will have a negative impact upon the usability of many websites.

10.3 If you block cookies, you will not be able to use all the features on our website.

## **11. Our details**

11.1 This website is owned and operated by Lie Detector Test UK Limited

11.2 We are registered in England and Wales under registration number 11475975 and our registered office is at 590 Kingston Road, London, United Kingdom, SW20 8DN, UK

11.3 Our principal place of business is at 590 Kingston Road, London, United Kingdom, SW20 8DN, UK

11.4 You can contact us:

(a) By post, using the postal address given above;

(b) Using our website contact form;

(c) By telephone, on the contact number published on our website from time to time;  
or

(d) By email, using the email address published on our website from time to time.