

Scion Limited

Privacy Policy (May 2020 Edition)

Scion Limited ("We") are committed to protecting and respecting your privacy.

This Privacy Policy (together with our [Website Terms of Use](#) and [Cookie Policy](#)) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

The General Data Protection Regulation ((EU) 2016/679) (GDPR)), which was implemented into English law by the Data Protection Act 2019 (DPA), gives data subjects (living individuals in respect of whom personal data is processed) enhanced rights and protections in relation to their personal data. We are committed to safeguarding the privacy of the users of our services. This Privacy Policy tells you about how we look after your personal data when you visit our website (regardless of where you visit it from) and tells you about your privacy rights and how the law protects you. It sets out what personal data we collect, why we collect that personal data and how we handle it. We are Scion Limited of 73 Cornhill, London, United Kingdom, EC3V 3QQ and we are the Data Controller (as that term is defined in data protection legislation) of the personal data we collect from you and are responsible for this website.

This website is not intended for children and we do not knowingly collect data relating to children.

Please read the privacy policy carefully. By visiting our website www.scion.com you are accepting and consenting to the practices described in this policy. Where you join Scion as a member, our member terms will apply to you. A copy of our Member Terms can be found at [\(Member Terms\)](#).

1. What information do we collect from you?

We may process the following data about you:

1.1 Information you give us.

What personal data might you supply to us?	How and why we process your personal data:
Member information: Information about you which relates to your membership account with us or your employer's membership account with us. This information may include your name, your contact information including your address, email address, phone number and your country of location, industry or service sector. Depending on the type of membership you choose, we may ask you to provide additional information in order to verify your identity. This might include a copy of a recent utility bill (in order to verify your address) and identification evidence (such as a copy of your passport or driving licence). You do not have to provide such documents if you do not wish to do so and are under no obligation to provide such documents.	We will process this data to maintain your membership account with us, to provide our services to you, to communicate with you and to back up our database. The reason we process this data, and our justification for processing this data, is to ensure the proper administration of your membership account and our business (our legitimate interest) and, where you have entered into a contract with us, for the purposes of fulfilling our contract with you.

<p>Registration Information: Information you provide when you register to use our website as a free member, and when you report a problem with our website. The information you give us may include your name, address, e-mail address, phone number and your country of location.</p>	<p>We will process this data so we can deal with your registration as a free member, or your other communications or applications, or to address your query or concern. The reason we process this data, and our justification for processing this data, is to ensure the proper administration of your registration and our business (our legitimate interest).</p>
<p>Communication Data: If you communicate with us, we may process the information contained in your communication. This information may include your name and contact information, the content of your communication and any metadata our website generates where you communicate with us using the contact form available on our website.</p>	<p>We will process that information so we can correspond with you and keep records of such correspondence. The reason we are processing this data, and our justification for processing this data, is to ensure the proper administration of our business (our legitimate interest).</p>
<p>Notification Data: Where you subscribe to receive our email notifications, newsletters and/or you join Sciony as a member, we will process your data so that we can send such email notifications and/or newsletters to you.</p>	<p>Where you subscribe to receive email notifications and/or newsletters from us, you will have given us your consent to receiving such communications and this is the legal basis for us processing this data. Where you have joined Sciony as a member, and you have agreed to be bound by the Member Terms, we will assume that you are happy to receive email notifications and/or newsletters from us, on the basis that you have joined Sciony as a member and you wish to be kept notified and informed about the services we supply through www.Sciony.com. Please note you can unsubscribe from receiving marketing emails and newsletters from us at any time. You can do this by clicking the unsubscribe option on such emails, by updating your marketing preferences in your account settings or by contacting us using the contact information details below in section 9. As a member of Sciony, you can choose to stop receiving email notifications from us but if you do so, you may not be able to receive the full benefit of the services offered through the Sciony website (for example, this will stop you being notified when someone wishes to connect with you).</p>
<p>Account Information: Where we engage with you or your employer so that you can supply goods and/or services to our business, we may process information about you and/or your employees in order to manage and maintain our account with you. This information is likely to include the name, email address and telephone number of the individual(s) we need to communicate with in order to receive goods and/or services from you.</p>	<p>We will process that information so we can maintain our account with you, communicate with you and keep records of such communications. The reason we are processing this data, and our justification for processing this data, is to ensure the proper administration of our business (our legitimate interest).</p>

<p>Regulatory Data: We may process your data if we need to do so in order to comply with our legal and/or regulatory obligations, so that we can protect the vital interests of you or another natural person. The reason we will process such data is to protect the vital interests of you or another natural person.</p>	<p>The reason we will process such data is to protect the vital interests of you or another natural person.</p>
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1.2 Information we collect about you.

With regard to each of your visits to our website we will automatically collect the following information:

- (a) technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. We will obtain this data through our analytics tracking system. We process this data so we can monitor and analyse how our website is used so we can improve our website and our services;
- (b) information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our website (including date and time), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page. We process this data so we can monitor and analyse how our website is used so we can improve our website and our services.

1.3 Information we receive from other sources.

We may work with third parties in order to provide our services to you. For example, we use mailchimp, an online platform operated by The Rocket Science Group LLC, to help manage information supplied by the users of our website. . We may receive personal data about you from these organisations. Those organisations will have their own privacy policies detailing how they process personal data.

2. Cookies

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. For detailed information on the cookies we use and the purposes for which we use them see our [Cookie Policy](#).

3. When will we disclose your personal data to others?

3.1 We may need to share your personal information with certain selected third parties as follows:

- (a) our business partners, suppliers and sub-contractors for the purpose of making available our website and informing users of our website about the services we provide. In particular, we use a third party company called Nitro Digital Limited to help us establish the profile(s) of people who might be interested in the services we offer. We also use a third party processor to process payments on our behalf. They process limited personal data in order to provide their services to us;

- (b) to enable members to receive the full benefits of their membership, we may need to disclose limited personal information about a member to another member. WE WILL NEVER DISCLOSE YOUR PERSONAL INFORMATION TO ANOTHER MEMBER WITHOUT YOUR PRIOR WRITTEN CONSENT. YOUR CONSENT TO THE DISCLOSURE OF YOUR PERSONAL INFORMATION WILL BE GIVEN WHEN IT IS CONFIRMED TO US THAT YOU HAVE ENTERED INTO THE MUTUAL NDA REFERRED TO IN OUR MEMBER TERMS WITH ANOTHER MEMBER. The ONLY personal information we will share with another member is your email address, as this is the only information needed by a member in order to connect with another member. You will then have full control over what further information you share with that member. Please refer to our Member Terms for full details; and
- (c) analytics and search engine providers that assist us in the improvement and optimisation of our website.

3.2 We will also disclose your personal information to third parties in the following circumstances:

- (a) If we sell or buy any business or assets, in which case we may need to disclose certain personal data to the prospective seller or buyer of such business or assets.
- (b) If all or most of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets.
- (c) If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce any legal agreement we have with you; or to protect our rights or property, or the safety of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

4. Where do we store your personal data?

We may need to transfer your personal data outside the UK and European Economic Area. Where it is necessary for us to transfer your personal data outside the European Economic Area, we will only transfer such personal data to third parties where we have carried out due diligence on such third parties to ensure they will protect your personal data using similar standards and safeguards as we have. We will also have contractual provisions in place with such third parties to ensure your personal data is protected. Such contractual provisions will be based on the standard contractual clauses approved by the European Commission for the transfer of data outside the EEA or such other appropriate standards as are required from time to time by the European Commission or the UK Government. You consent to the transfer of your personal data outside of the EEA, as long as we comply with these requirements.

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, and we will maintain appropriate technical and organisation measures to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

5. Storage and deletion of personal data

- (a) We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it which will include satisfying any legal, accounting, or reporting requirements. Any personal data that we process will be deleted from our systems once we have completed the purpose for which we were processing the personal data. In some cases, the purpose for which we are processing your personal data will last for a considerable period (for example, if you become a long term subscriber to our website and its associated services, we will need to store your data until our relationship with you comes to an end).
- (b) 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 requirements. We will take into consideration a number of factors such as your relationship with us, your engagement with us, and the fulfilment of contracts we have with you.
- (c) We may need to retain your personal data where this is necessary to comply with our legal or regulatory obligations, or to protect the vital interest or the vital interests of another natural person.

6. Data security

We have appropriate security measures in place to prevent personal information from being accidentally lost or from being used or accessed in an unauthorised way. We limit access to your personal information to those 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 data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

7. Your rights

7.1 Under data protection laws you have the following fundamental rights:

- (a) The right to access the personal data we hold about you;
- (b) The right to have your personal data corrected if there are errors or inaccuracies in it, or your personal data is incomplete;
- (c) The right to restrict the processing we carry out in relation to your personal data;
- (d) The right to object to the processing we carry out in relation to your personal data;
- (e) The right to have the personal data we hold about you provided to you in a useable format;
- (f) The right to complain to a supervisory authority (in the UK this is the Information Commissioner's Office) about how and/or why we are processing your personal data. We would, however, appreciate the chance to deal with your concerns before you approach the ICO if you are able to contact us in the first instance;
- (g) The right to tell us you no longer consent to us processing your personal data. In practice you will usually agree in advance to us using your personal data for marketing purposes and if you no longer wish us to use your personal data for marketing purposes, you can opt out of receiving such marketing messages at any time. You can do this either by unsubscribing from the marketing messages we send you, notifying us in writing at support@scionny.com or updating your marketing preferences in your [account settings](#).

7.2 You can ask us to provide you with details of any personal data we hold about you. You do not have to pay us a fee to access your personal data unless we believe your access request is unfounded, repetitive or excessive. In this case we may charge you a reasonable fee to access your personal data or we may decide not to comply with your request. We will notify you if this is the case. We will require you to provide appropriate evidence of your identity before we respond to your request. Typically this identification evidence will be a photocopy of your passport or photo driving licence, which a solicitor or bank has certified as being a true copy of the original and a copy of a recent utility bill detailing your current

address.

7.3 Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

7.4 If you think that any of the data we hold about you is incorrect or inaccurate, you can contact us to correct such data. Please keep us informed if your personal data changes during your relationship with us. You can do this at support@scionny.com.

8. Changes to our privacy policy

Any changes we make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

9. Information about us

This privacy policy relates to Scionny Limited (company registration number 11953603). The registered office address is 73 Cornhill, London, United Kingdom, EC3V 3QQ. We can be contacted by post at 73 Cornhill, London, United Kingdom, EC3V 3QQ, using our website [contact form](#), or by email support@scionny.com.

Our data protection department can be contacted using the details below.

10. Any questions?

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to

Scionny Limited

Data Protection Department

73 Cornhill, London, United Kingdom, EC3V 3QQ

Email: support@scionny.com