

Armago Group Ltd

Privacy Notice.

Armago Group Ltd (hereafter: 'Armago') respects your privacy and are committed to protecting your personal data. This Privacy Notice will inform you as to how we look after your personal data when you use our services, the app and website (together called the 'Platform').

The Privacy Notice will also tell you about your privacy rights and how the law protects you. This Privacy Notice also applies to how you may engage us in other ways, such as through sales and marketing activities and events.

Please use the Glossary to understand the meaning of some of the terms used in this privacy notice. The contents are as follows:

1. Introduction: Who we are, purpose of the Privacy Notice and important information
2. The data we collect about you
3. How your personal data is collected
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1. Introduction: who we are, purpose of the Privacy Notice and important information

We are Armago, a digital platform designed to connect students through sports. The main purpose of the platform is to make it easy for university sports clubs to organise and manage their members. The functionality includes uploading of events, tracking club attendance levels and sharing key updates.

Armago is a data controller. Our registered company number is 13068459. Our registered address is Moors Barn, Spenny Lane, Tonbridge, Kent, TN12 9PR. Our website address is <https://www.armago.io/>.

Purpose of the Privacy Notice

This Privacy Notice aims to give you information on how Armago collects and processes your personal data via our Platform, including any data you may provide through the Platform when you engage with us.

Please note: the Armago Platform is not intended for children, and we do not knowingly collect data relating to children. The Platform is intended for those studying at university on undergraduate and postgraduate courses.

It is important that you read this Privacy Notice together with any other Privacy Notice or fair processing notice we may provide on specific occasions when we are collecting or processing

personal data about you, so that you are fully aware of how and why we are using your data. This Privacy Notice supplements any other notices provided by us and is not intended to override them.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, encourage you to contact us in the first instance, before you approach the ICO.

Changes to the Privacy Notice and your duty to inform us of changes.

The data protection law in the UK changed on 25 May 2018. 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.

Third-party links.

Our Platform may include links to third-party websites, plug-ins and applications. This could be for example when sports club committees share links to members or through links on the club pages that show the purchase of membership or further club information. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy policies and procedures. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about you.

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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 and last name.
- **Contact Data** includes email address.
- **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 name and password, preferences, clubs and teams that you've joined and feedback and survey responses, university course and year of graduation.
- **Usage Data** includes information about how you use our platform and website services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific app or website feature. However, if we combine or connect Aggregated Data with your personal data so that it 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 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.

3. 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, phone, email or otherwise. This includes personal data you provide when you:

- create an account on our Platform and sign up to specific features with the Platform
- upload or provide us with content, photos and updates on your club's activities
- submit forms on our Platform
- request Armago marketing to be sent to you
- sign up to any Armago service or publications (whether payable or free)
- enter an Armago competition, promotion or survey
- give us some feedback about the Platform

Automated technologies or interactions. As you interact with our website, we may 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 may receive personal data about you from various third parties as set out below.

Technical Data from the our app development partner

Contact, Financial and Transaction Data from providers of technical, payment and delivery services

Identity and Contact Data from data brokers or aggregators

Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register.

4. 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 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 it is necessary for your vital interests or those of another person (life and death situations)
- Where we need to comply with a legal or regulatory obligation

Purpose or activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>To manage our relationship with you. This will include:</p> <ul style="list-style-type: none"> a) providing the services on our Platform that you request and sign up to b) managing your account with us c) presenting relevant content to you d) notifying you about new Platform updates, features, and benefits e) administer a promotion, survey or other Platform feature f) personalising your Platform experience and offer services that may interest you g) Notifying you about changes to our terms or Privacy Notice h) Asking you to leave a review or take a survey 	<ul style="list-style-type: none"> a) Identity b) Contact details c) Profile d) Marketing and communications 	<ul style="list-style-type: none"> 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 and to study how customers use our services)
<p>To administer and protect our organisation and Platform (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<ul style="list-style-type: none"> a) Identity b) Contact details c) Technical 	<ul style="list-style-type: none"> a) Necessary for our legitimate interests (for running our organisation, provision of administration and IT services, network security, to prevent fraud) b) Necessary to comply with a legal obligation
<p>To deliver relevant content and advertisements to you via our Platform (in the sports clubs you join) and measure or understand the effectiveness of the advertising we serve to you</p>	<ul style="list-style-type: none"> a) Identity b) Contact details c) Profile d) Usage e) Marketing and communications f) Technical 	<p>Necessary for our legitimate interests (to study how customers use our platform and website, to develop them, to grow our organisation and to inform our marketing strategy)</p>
<p>To use data analytics to improve our Platform's services, marketing, customer relationships and experiences</p>	<ul style="list-style-type: none"> a) Technical b) Usage 	<p>Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated)</p>

		and relevant, to develop our organisation and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	<ul style="list-style-type: none"> a) Identity b) Contact c) Technical d) Usage e) Profile 	Necessary for our legitimate interests (to develop our services and grow our organisation)

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out, 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. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out.

Marketing

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

Promotional offers from us.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Third-party marketing.

We will get your express opt-in consent before we share your personal data with any organisation outside Armago, for marketing purposes specifically. See **section 5 (disclosures of your personal data)**.

Opting out.

You can ask us or third parties to stop sending you marketing messages at any time, by logging into the Platform 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, or by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, service experience or other transactions.

Cookies.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see the **Armago Cookies Policy**.

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.

5. Disclosures of your personal data

Third parties

We may share your information with third parties where we have a legal obligation to do so, or where permitted under the Data Protection Act, or with a third party working on behalf of Armago. We may share your personal data with third parties that:

- host our website, app and provide our IT system
- process payments for us
- provide customer support services, technical operations and account management for us
- sponsor events, webinars or contests for which you register
- provide consultancy, banking, legal, insurance and accounting services to us
- want to buy our business, in which case we can disclose Aggregated Data to the potential buyer and their legal team and auditors, but not your individual Personal Data
- deliver and administer our services such as employees and contractors working in our company or in companies within our group.

We will strive to ensure that any third party who we share personal data with, has sufficient systems and procedures in place to prevent any loss of data. We will not share your data with third parties for marketing or sales purposes, or for any commercial use without your prior express consent.

Detect and prevent fraud or crime

We may use any of the information you provide to us for the prevention and detection of fraud or crime. We may share information provided to us with other bodies responsible for auditing, or administering public funds, or where undertaking a public function, in order to prevent and detect fraud or crime. This includes the Cabinet Office, the Department for Works and Pensions, other local authorities, HM Revenues and Customs and the Police.

6. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, 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 required access for the upkeep and running of the platform. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breaches and will notify you and any applicable regulator of a breach where we are legally required to do so. The law requires us to notify you without delay upon the discovery of a data breach which could pose a high risk to your rights and freedoms.

7. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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.

By law, we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers but only where this is applicable for tax purposes. Where no financial/transaction data is gathered, we will keep your data for 6 months, after which time, it will be either permanently deleted or anonymised. In some circumstances you can ask us to delete your data: see Request erasure below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

8. Your legal rights

You have rights under data protection laws in relation to your personal data. You have the right to:

- Be informed
- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data (right to be forgotten)
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data (in a machine-readable format)
- Right to withdraw consent
- Right to not be subject to automated decision-making

A full description of these rights are set out further below under the heading: **Your legal rights.**

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

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 may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information relating to your profile on Armago 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.

Time limit to respond.

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

9. Glossary.

Legitimate Interest means the interest of Armago in conducting and managing our organisation to enable us to give you the best service 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.

Vital Interests means Armago may need to process personal data where this is necessary to protect an interest which is essential for the life of the data subject/caller or the life of another natural person. This is applicable to situations of life and death.

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

External third parties

Emergency services, crises intervention or child protection agencies for safeguarding concerns. The ICO or other governmental agencies and regulators based in the United Kingdom such as HMRC and the NCA.

Your legal rights

You have the right to:

- **Be informed** about the collection and processing/use of your personal data. You have the right to be informed about the nature of our business, the data processing activities we may carry out using your personal data, the length of time we will keep your personal data, your rights in respect of us processing your personal data and your right to lodge a complaint with the ICO.
- **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: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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; or (d) 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.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.
- **Not to be evaluated based on automated decision-making.** Specifically, you have a right not to be subject to a decision that is solely based on automated processing, for instance profiling for jobs.

10. Contact & Changes to the Privacy Notice

If you have any questions about this policy or how we handle your personal data, please contact us at mark@armago.co.uk

We will regularly review and update this privacy notice to comply with changes in Data Protection legislation and to reflect changes in our services.

Privacy Notice was last updated on **24/08/2023**.

The next review will take place on **10/01/2024**