

Privacy Policy

Aspen Software respects your privacy and is committed to protecting your personal data, we will always treat your personal information as confidential.

This Privacy Policy describes how we look after your personal data when you visit our website, use or enquire about any of our products and services or engage with us in other ways (such as a through partnering, supplying or becoming part of our team).

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1. Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how Aspen Software collects and processes your personal data through the interactions you may have with us.

This website and our products and services are not intended for children and we do not knowingly collect data relating to children.

Please read this notice in conjunction with any terms of business or other notices we may provide on specific occasions when we are collecting or processing personal data about you, or for you, so that you are fully aware of how and why we are using this data. This privacy policy supplements the other notices and is not intended to override them.

Controller and contact information

Aspen Software is the controller and responsible for your personal data (collectively referred to as "Aspen Software", "we", "us" or "our" in this privacy policy).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager by email to dataprotection@aspensoftware.co.uk or by post to Aspen Software, The Studio 9 Cinnamon Close, Earley, Reading RG6 5GP United Kingdom.

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), where our registration number is Z5727264. 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 the privacy policy and your duty to inform us of changes

This policy was last updated 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 website may include links to third-party websites and applications. 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 statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

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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** - first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** - billing address, delivery address, email address and telephone numbers.
- **Financial Data** - bank account details.
- **Transaction Data** - details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** - 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** - your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** - information about how you use our website, products and services.
- **Marketing and Communications Data** - your preferences in receiving marketing from us and your communication preferences.

We also collect and use **Aggregated Data** such as statistical or demographic data to help us understand and improve how our products and services are used. 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 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 policy.

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 fulfil the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this situation, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

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3. How we collect your personal data

We collect data from and about you 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:
 - purchase our products or services
 - enquire about our products or services
 - give us some feedback
 - offer products or services to us
- **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 and publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from analytics provider Google based outside the EU.
 - Contact, Financial and Transaction data from providers of payment services GoCardLess and PayPal (Europe) based inside the EU.
 - Identity and Contact Data from Companies House based inside the EU.

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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 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 or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending our own direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing communication at any time by using the unsubscribe links in the communication or by [contacting us](#).

Purposes for which we will use your personal data

The table below describes 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 in the table below.

Purpose/Activity	Type of Data	Lawful Processing Basis	Retention Period
To administer and protect our business, website and applications (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	1. Identity 2. Contact 3. Technical 4. Usage	Necessary for our legitimate interests: - To enable the operation of our business. - Provision of administration and IT services. - Network security. - Fraud protection. Necessary to comply with a legal obligation.	1 year after receipt.
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.	1. Technical 2. Usage	Necessary for our legitimate interests: - To define types of customers for our products and services. - To keep our website updated and relevant. - To develop our business and to inform our marketing strategy.	1 year after receipt.
To process and deliver ordered products or services. Including: 1. Providing ongoing contracted information about the service. 2. Managing payments, fees and charges. 3. Collecting and recovering monies owed to us.	1. Identity 2. Contact 3. Financial 4. Transaction 5. Marketing & Communications	Performance of contract. Necessary to comply with a legal obligation. Necessary for our legitimate interests: - To recover debts due. - To understand how our products and services are being used so that improvements can be made as required.	90 days after contract completion for transaction data. 7 years after contract completion for contact, financial, marketing and communications. Thereafter, remaining identity data is anonymised for internal statistical use.
To respond to enquiries from prospective clients.	1. Identity 2. Contact	Necessary for our legitimate interests: - To provide requested information about our products and services.	7 years after last contact.
To manage our relationship with partners or suppliers.	1. Identity 2. Contact	Necessary for our legitimate interests: - To enable the efficient acquisition of goods and services as part of our operation.	7 years after contract completion.

Purpose/Activity	Type of Data	Lawful Processing Basis	Retention Period
To respond to enquiries from potential partners or suppliers.	1. Identity 2. Contact	Necessary for our legitimate interests: - To enable the efficient acquisition of goods and services as part of our operation.	7 years after last contact.
Employment information about current and past staff members.	1. Identity 2. Contact	Performance of contract. Necessary to comply with a legal obligation. Necessary for our legitimate interests: - To maintain staff welfare and development.	Reduced data held indefinitely after completion of employment contract to confirm employment record and for insurance purposes.
To respond to enquiries from potential staff.	1. Identity 2. Contact	Necessary for our legitimate interests: - To assist any recruitment process.	3 years after receipt.

Marketing

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 products, 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 goods or services from us and, in each case, you have opted in to receiving that marketing.

Third-party marketing

We do not share your personal data with any third-party company for marketing or advertising purposes.

Opting out

You can ask us to stop sending you marketing messages at any time by following the unsubscribe links on any marketing message we send you or by [contacting us](#).

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 [cookie 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.

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5. Disclosure of your personal data

We may have to share your personal data with the parties given below for the purposes set out in the table in [paragraph 4 above](#).

External Third Parties

- Service providers acting as processors based the United Kingdom and Republic of Ireland who provide IT services.
- Professional advisers including lawyers, bankers, accountants and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business. 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 policy.

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.

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6. International Transfers

We do not transfer your personal data outside the European Economic Area (EEA).

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7. 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 business need to know. 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 breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

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8. Data Retention

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.

Details of retention periods for different aspects of your personal data are set out in the table in [paragraph 4 above](#).

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.

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9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. 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: (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 products or services to you. We will advise you if this is the case at the time you withdraw your consent.

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 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.

Time limit to respond

We try to respond to all legitimate requests within one month of receipt. 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.

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