

9 Spokes Privacy Notice

Last updated: Monday, 7 May 2018

At 9 Spokes, we put trust at the foundation of our customer relationships and are committed to protecting the privacy of individuals whose information is in our custody. We take the security of personal data very seriously and understand that privacy is not just an essential part of what we do, but also at the core of our business.

9 Spokes' policy is to comply with local laws, including General Data Protection Regulation (GDPR) to ensure compliant handling and use of personal data is maintained at all times. This includes ensuring:

- We only collect data relevant to providing you the best service.
- We are transparent about how we handle, store and use your data.
- You are able to access and modify your personal data as needed.
- You can contact us about your data at any time at privacy@9spokes.com.

For more information on 9 Spokes GDPR compliance please read [9 Spoke's General Data Protection Regulation Statement](#).

1. YOUR PRIVACY

1.1 9 Spokes International Limited and its related companies (collectively **9 Spokes** or **company**) takes the issue of safeguarding your privacy online seriously. 9 Spokes has created this Privacy Notice in order to demonstrate the company's firm commitment to being custodians of the information you provide to us and the information we collect in the course of operating our business.

1.2 This Privacy Notice applies if you make any enquiry with us, apply to work with us or apply or use any of 9 Spokes products and or services via our website and online services, including <https://www.9spokes.com/>, and <https://dashboard.9spokes.com/portal> and any other website, mobile app or other online service created or hosted by us from time to time (**9S Services**); but does not apply in relation to any of the consolidated range of online software applications ("**Apps**") that may be made available to you through the 9 Spokes service from a range of software developers known as "Online Software Partners"

(“**OSPs**”) [please see section 10 \(Third Party Links\)](#). Please make sure you read each OSP's privacy notice, as 9 Spokes is not responsible for the privacy practices of the OSPs or the content of their Apps.

- 1.3 This Privacy Notice (together with our [Terms and Conditions](#) and any other documents referred to on it) explain how as a data controller, 9 Spokes may collect, use and/or share information that we collect from you, or that you provide to us (either directly or indirectly), and how it will be processed by us in accordance with the applicable data privacy laws. Where you use the 9S Service, or your personal data is processed in connection with the 9S Service, 9 Spokes will be the data controller of such information. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting <https://www.9spokes.com> you are accepting and consenting to the practices described in this Notice.
- 1.4 From time to time, there may be more than one data controller of your information within our group where you have engaged different parts of our broader organization to provide different or jointly delivered services.
- 1.5 9 Spokes reserves the right to change this Privacy Notice at any time. The most current version will be posted on the 9 Spokes website, and we recommend that you check regularly to ensure you are familiar with the most current version of this Privacy Notice. 9 Spokes will use its reasonable efforts to communicate any changes to you through the 9S Service.

2. **SCOPE OF PRIVACY NOTICE**

This Privacy Notice explains and describes:

3. [When this Privacy Notice applies.](#)
4. [Collection of personal information.](#)
5. [Legal basis for usage of personal data.](#)
6. [Where your personal information is stored.](#)
7. [Ways we use data.](#)
8. [Disclosure of data.](#)
9. [Collection of information other than personal information.](#)
10. [Third Party Links.](#)

11. [Security.](#)
12. [Reviews.](#)
13. [Your rights, access and correction of personal information.](#)
14. [Data retention.](#)
15. [Further information.](#)
16. [Contacting us.](#)

3. WHEN THIS PRIVACY NOTICE APPLIES

3.1 This Privacy Notice applies:

- (a) to your use of the 9S Services;
- (b) as a result of your relationship with one or more of our customers;
- (c) to any information collected from third parties;
- (d) your supply of services to us where this involves any personal data; and/or where you make enquiries with us or apply to us for a job or work placement.

3.2 Please note that our 9S Service makes use of cookies and similar technologies, as described in more detail in [clause 9 below: \(Collection of Information Other Than Personal Information\).](#)

4. COLLECTION OF PERSONAL INFORMATION

4.1 “**Personal data**” is any information that can be used to identify you or that we can link to you.

4.2 The personal information 9 Spokes collects and stores will depend on what products and services you request from the company. This includes (but is not limited to) current and historical personal data, information provided when you submit names (including employee and subcontractor names), information provided to 9 Spokes in person, by email, telephone or online such as; title, identification, employment, positions held, enquiry/complaint details, information about the organisation which you are affiliated, emails, usernames, addresses, country of residence, geographic location, log-in information, other contact details, date of birth, telephone numbers, billing information or

other personally identifiable information to 9 Spokes, or when you process such information through the 9S Service, other online services or any of the Apps.

- 4.3 The information that 9 Spokes collects and stores when you use the 9S Service may include technical information, such as the Internet protocol (IP) address used to connect your computer, tablet, mobile or other device to the 9S Service or any of the Apps, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, information you post online, full Uniform Resource Locators (URL) clickstream to, through and from the 9S Service or any of the Apps. Please see [clause 9 below: \(Collection of Information Other Than Personal Information\)](#) for more details about these types of information that we may gather.
- 4.4 Use of the 9S Service allows you to personally monitor certain financial, personal and other information about you, your business and/or your customers which you have provided to 9 Spokes and/or an OSP through an App (“**User Content**”). To provide the 9S Service, 9 Spokes extracts User Content about your business from the Apps. 9 Spokes may also integrate such User Content with other Apps you have signed up to use through the 9S Service.
- 4.5 If you choose to pay for the 9S Service by card, we will not hold your card details. When you submit your details they will be transmitted directly to our secure billing and payment collection service provider, who will handle your data in accordance with its own policies.
- 4.6 When you provide, through the 9 Spokes Service or an App, personal information of a third party (for example your own customer details), 9 Spokes will collect such information from you and use it in accordance with this Privacy Notice and our [Terms and Conditions](#). Where you provide the personal information of a third party, you must ensure that the third party is aware of this Privacy Notice, understands it and has agreed to accept it.
- 4.7 We will also collect your personal information if you make an enquiry about any aspect of 9 Spokes, if you are an actual or potential investor in 9 Spokes, request information from 9 Spokes, contact 9 Spokes through our network of sites or in any other manner, or access 9 Spokes' network of sites for any reason.
- 4.8 In some instances, personal data must be provided to 9 Spokes in order for us to legally or contractually provide a service to you, for example where we need to fulfil a password reset request. Where relevant we will highlight this to you.
- 4.9 The company may also receive information about you if you use any other websites that we operate or may operate from time to time or other services we provide. 9 Spokes may share information amongst members of our group, which means our subsidiaries, our

ultimate holding company and its subsidiaries. We may also work with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference or employment checking agencies) to help us provide 9S Services and we may receive information about you from them. Where we work with third parties we check that they are suitable and will treat your personal information as safely and securely as we do.

- 4.10 Where personal information is classified under applicable laws to be 'sensitive' (racial or ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health, sexual life, criminal proceedings and offences) 9 Spokes will only use this information to provide the service you require and we will ask for your explicit consent.
- 4.11 If you apply for a job or work placement with 9 Spokes, then you may need to provide information about your education, employment, racial background and state of health. As part of your application you will be asked to provide your express consent to the company's use of this information to assess and verify your application and to allow us to carry out both recruitment analytics and any monitoring activities which may be required under applicable law as an employer. 9 Spokes may also carry out screening checks (including reference, background, directorship, financial probity, identity, eligibility to work, vocational suitability and criminal record checks) and consider you for other positions.
- 4.12 If you work with us and are issued with any type of device and/or building access card or code we may also collect information about you from your use of these items.
- 4.13 9 Spokes may exchange your personal data with academic institutions, recruiters, screening check providers, health service providers, professional and trade associations, law enforcement agencies, recruitment analytics providers, referees and your current and previous employers. Additional information may be gathered about you from publicly available resources such as LinkedIn or other social or professional media platforms and collated with the information that you provide to us. Without your personal data, 9 Spokes may not be able to progress considering you for positions with us. 9 Spokes will handle any unsolicited information in accordance with law, including destroying or de-identifying such information where we are required to do so.

5. LEGAL BASIS FOR USAGE OF PERSONAL DATA

- 5.1 Where 9 Spokes intends to use your personal data, we rely on the following legal grounds:
- (a) **Performance of a contract:** The company may need to collect and use your personal data to enter into a contract with you or to perform a contract that you

have with us. For example, registering to join 9 Spokes and where we respond to your requests and provide you with services in accordance with our [Terms and Conditions](#) or other applicable terms of business agreed with you or with your employing organization.

- (b) **Legitimate interests:** Where 9 Spokes consider use of your information as being non-detrimental to you, within your reasonable expectations, and necessary for the company's own, or a third party's legitimate purpose, including:
 - (i) for our own direct marketing or continued communication with you;
 - (ii) the prevention of fraud;
 - (iii) our own internal administrative purposes;
 - (iv) personalisation of the 9S Service(s) we provide to you;
 - (v) ensuring network and information security, including preventing unauthorised access to electronic communications networks and stopping damage to computer and electronic communication systems; or
 - (vi) reporting possible criminal acts or threats to you or us, or for public security to a competent authority.
- (c) **Compliance with a legal obligation:** 9 Spokes may be required to process your information due to legal requirements, including employment laws, tax laws and other regulatory provisions applicable to us as a provider of the 9S Services and online services.
- (d) **Consent:** You may be asked to provide your consent in connection with certain services that 9 Spokes offer, for example in respect of any processing of your personal data for our marketing purposes where you or your employing organisation is not a customer of 9 Spokes, or in respect of certain special categories of personal data such as your health or racial background for which we are legally obliged to gain your consent due to the sensitive nature of such information and the circumstances in which it is gathered or transferred. Where we are reliant upon your consent, you may withdraw this at any time by contacting us in accordance with the [clause 15 \(Further Information\) below](#).

6. WHERE YOUR PERSONAL INFORMATION IS STORED

- 6.1 9 Spokes stores your information on infrastructure operated by third party cloud service providers, and maintains an email database for subscribers to the company monthly

e-newsletters. 9 Spokes also stores investor information with its share registry (Boardroom Pty Limited ABN 14 003 209 836).

- 6.2 The data that 9 Spokes collects from you may be transferred to, and stored at, a destination outside the European Economic Area ("**EEA**") that does not have a similar standard of protection laws to those maintained by the member states of the European Union. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of any order, the processing of payment details and the provision of support services. Your personal data will always be required to be treated to at least UK standards, and by submitting your personal data, you agree to this transfer, storing or processing. 9 Spokes will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Notice.

7. WAYS WE USE DATA

- 7.1 9 Spokes collects your personal information so that we can provide you with the 9S Services and for various internal functions and services. This may include, but is not limited to:
- (a) carrying out our obligations arising from the contracts entered into between you and us including the provision to you with information, products and services that you request from us, content and dealing with your requests and enquiries;
 - (b) to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
 - (c) extracting User Content from any of the Apps you have signed up to use through the 9S Service;
 - (d) integrating User Content with other Apps you have signed up to use through the 9S Service;
 - (e) allowing you to participate in interactive features of the 9S Service, when you choose to do so;
 - (f) personalising the way in which content is presented to you and provide you with the most user-friendly navigation experience;
 - (g) providing technical support and other services necessary to ensure your successful use of the 9S Service;

- (h) if you use a Channel Partner (eg, bank or financial service provider) instance of the 9S Service, communicating with and providing assistance to the Channel Partner to ensure your successful use of the 9S Service;
- (i) sending out feedback and surveys and addressing any issues or complaints;
- (j) invoicing and entering into financial transactions with you;
- (k) answering any queries about 9 Spokes and its products and services or any other offering;
- (l) sending newsletters, advertising and promotions;
- (m) notifying you about changes to the 9S Service or products or contacting you in relation to service updates that affect you, regulatory updates that affect the 9S Service and any additional information in relation to the 9S Service that we think you may find interesting;
- (n) evaluating, recruit, and hire personnel;
- (o) researching, planning, service development, security or risk management;
- (p) where you have expressly consented to us contacting you for marketing purposes, by ticking the relevant box during the sign-up process, to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. We will only provide your data to selected third parties for marketing purposes if you have expressly consented to this. If you do not want us to use your data in this way, please ensure that the relevant box is ticked or unticked as appropriate where we collect your data;
- (q) sending special deals, promotions and offers based on users interests plus other news on 9 Spokes, including updates of new, or enhanced services;
- (r) using IP addresses see [clause 9.1 \(IP Addresses\)](#) to identify the location of users, to block disruptive use, to establish the number of visits from different countries and to determine what country you are accessing the 9S Services from;
- (s) purposes relating to your investment in 9 Spokes, including to assess and process your application and to service your needs as an investor and shareholder;
- (t) confirming receipt of profile changes; and

(u) as we believe reasonably necessary or appropriate to: comply with our legal obligations; respond to legal process or requests for information issued by government authorities or other third parties; or protect your, our, or others' rights.

7.2 If you do not provide 9 Spokes with your personal information, one or more of the above functions or services may not be able to be provided or performed.

7.3 We may combine information that is gathered by different means for the purposes set out above.

7.4 9 Spokes may also modify the content of any User Content by removing from such content all material that could identify you or any other person or organisation (**De-identified Content**). 9 Spokes may then for benchmarking and other purposes use, reproduce and adapt such De-identified Content to provide gap analysis and trend analysis for customers, as well as wider gap and trend analysis of industry verticals.

7.5 If at any time we intend to change the purpose for which we hold your personal data, we will give you prior information of that new purpose so you are aware of this.

8. DISCLOSURE OF DATA

8.1 In providing our services and operating our business, 9 Spokes may allow access to your personal data to the different entities within 9 Spokes group for our internal administrative purposes such as billing, promoting our events and services, and providing you or your organisation with the 9S Services, provided in all instances that such processing is consistent with [clause 5 \(Legal Basis for Usage of Personal Data\)](#) and applicable law.

8.2 9 Spokes will share your information with OSPs where it is necessary to do so to provide the 9S Services you have requested from us. If you use a Channel Partner (e.g. bank or financial service provider) instance of the 9S Service, we will share your information with the Channel Partner where it is necessary to do so to provide the 9S Services you have requested from us or the Channel Partner.

8.3 9 Spokes has established a network of specialist support, business advisors and technical advisors which we refer to as Business Support Partners (BSPs). If you choose to engage with a BSP, they can provide independent advice and support to you. 9 Spokes may share your information with BSPs that you engage, or those BSPs may have access to your information in the course of their supply of services to you.

8.4 9 Spokes may also disclose your personal information to its third party service providers as described below:

- (a) where you have consented to us sharing your personal data in this way;
- (b) when such sharing is provided for under contract, including our [Terms and Conditions](#) for any particular service that we may provide to you;
- (c) it is relevant in the circumstances to disclose the information to parties with whom we have co-promotional arrangements (such as jointly sponsored events or external venues);
- (d) we need to enforce or apply our [Terms and Conditions](#) to which you have agreed (or other terms that have been agreed to apply to our relationship with you or your employing organization);
- (e) Third Party professional advisors, such as accountants and IT service professionals, that you have appointed, or that you have requested us to appoint;
- (f) an OSP support provider where you have requested support in relation to an App;
- (g) it's invoicing and payment collection services to enable 9 Spokes to undertake financial transactions with you, such as invoicing, processing of payments, as well as compliance with any applicable legal, tax or regulatory obligations that may affect you or 9 Spokes;
- (h) any entity to which 9 Spokes is required, or authorised by or under law, to disclose such information, such as responding to a formal request in a court order, judicial proceeding or subpoena;
- (i) protect against misuse or unauthorised use of the 9S Service;
- (j) protect the safety, or property of our stakeholders, or the public;
- (k) in the event of a sale, merger, or acquisition of some, or all of 9 Spokes' assets or shares, your personal information could be disclosed as a part of the proposed transaction;
- (l) where you invest in 9 Spokes, your personal information may be disclosed to 9 Spokes' share registry (Boardroom Pty Limited ABN 14 003 209 836) and regulators;
- (m) Printers and other companies for the purposes of preparation and distribution of documents, marketing, and for handling of mail;
- (n) market research companies and analytics and search engine providers for the purpose of analysing the 9 Spokes Shareholder base and for product development

and planning and assisting us in the improvement and optimisation of the 9S Service;
and

- (o) legal and accounting firms, auditors, management consultants and other advisers for the purpose of administering and advising on the 9S Service, 9 Spokes' shareholding and shares.

8.5 Any third parties with whom the company 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 9 Spokes' behalf. When such third parties no longer need your personal data to fulfil this service, they will dispose of such details in line with 9 Spokes' procedures unless they are themselves under a legal obligation to retain information (provided that this will be in accordance with applicable data privacy laws). If 9 Spokes 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.

8.6 9 Spokes will not share your information with any third parties for their promotional purposes without your permission. However, you should be aware that:

- (a) OSPs may separately collect information from you, and they may use or share that information in accordance with their own policies, which you should review separately; and
- (b) Your engagement of a BSP is independent of 9 Spokes, and BSPs may use or share your information in accordance with their own policies, which you should review separately.

8.7 We own the database rights in the information collected via the 9S Service. We do not sell, rent, or otherwise share information that reasonably identifies you or your organisation with unaffiliated entities for their independent use except as expressly described in this Privacy Notice or with your express consent.

8.8 Information that does not reasonably identify you or your organization may be shared as permitted by applicable law.

8.9 9 Spokes may disclose your personal data 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 or apply our standard [Terms and Conditions](#); or to protect our rights, property, our customers, clients, company, or other related third parties. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

9. COLLECTION OF INFORMATION OTHER THAN PERSONAL INFORMATION

- 9.1 **IP addresses:** When you visit 9 Spokes' web site or click on one of the company's links, the company may automatically record information such as your Internet Protocol (IP) address, operating system, browser version, date and time of your visit, pages you accessed and information you downloaded. This information may be used to generate usage statistics, ensure that the company's site and emails are accessible to the widest possible audience and to assist in improving the quality and usability of the company's website. 9 Spokes may also use IP addresses to track abuse of our system.
- 9.2 **Links:** When 9 Spokes provides you with links in emails, they may include a special tracking code unique to you, which allows 9 Spokes to determine which content and advertisements are most popular. This data may be shared in aggregate form; however, it will never be shared in individual form.
- 9.3 **Cookies:** A cookie is a small string of information that we store on your browser or hard drive of your computer for identification purposes if you agree. Cookies contain information that is transferred to your computer's hard drive.
- 9.4 Cookies help us enhance navigation and the functionality of our website, to securely maintain a session for existing customers accessing password-protected areas, and to personalize aspects of a visitor's experience.
- 9.5 9 Spokes uses cookies to make interactions with the company's web site or 9S Service easy and meaningful. When you visit the company's sites, 9 Spokes servers send cookies to your computer.
- 9.6 Standing alone, cookies do not personally identify you, they merely recognize your web browser. Unless you choose to identify yourself to 9 Spokes, either by responding to a promotional offer, opening an account, or filling out a web site form (such as a "Contact Me"), you remain anonymous to the Company.
- 9.7 9 Spokes uses cookies that are session-based and persistent-based:
- (a) session Cookies exist only during one session. They disappear from your computer when you close your browser software or turn off your computer.
 - (b) persistent Cookies remain on your computer after you close your browser or turn off your computer.
- 9.8 If you have chosen to identify yourself to 9 Spokes, the company uses Session Cookies containing encrypted information to allow the company to uniquely identify you. Each time

you log into the web site or 9S Service, a Session Cookie containing an encrypted, unique identifier that is tied to your account is placed in your browser. These Session Cookies allow the Company to uniquely identify you when you are logged into the website or 9S Services and to process your online transactions and requests. Session Cookies are required to use the 9 S Service.

- 9.9 9 Spokes uses Persistent Cookies that only the Company can read and use to identify browsers that have previously visited the company's web site. When you purchase from the 9S Service or provide the company with personal information, a unique identifier is assigned to you. This unique identifier is associated with a Persistent Cookie that the Company places on your web browser. The company is especially careful about the security and confidentiality of the information stored in Persistent Cookies. For example, the Company does not store account numbers or passwords in Persistent Cookies.
- 9.10 If you disable your Web browser's ability to accept cookies, you will be able to navigate the Company's Web site, but you will not be able to successfully use the Services.

Third Party Cookies

- 9.11 9 Spokes engages third parties to track and analyse usage and volume statistical information from individuals who visit the company's Web site. 9 Spokes may also use other third-party cookies to track the performance of company advertisements. The information provided to third parties does not include personal information, but this information may be re-associated with personal information after the company receives it.
- 9.12 9 Spokes may also contract with third-party advertising networks that collect IP addresses and other Web Site navigational information on the company's web site and emails and on third-party Web sites.

Pixel Tags

- 9.13 A Pixel Tag, also known as a clear GIF or Web Beacon, is an invisible tag placed on certain pages of our website but not on your computer. When you access these pages, Pixel Tags generate a generic notice of that visit. They usually work in conjunction with cookies, registering when a particular computer visits a particular page.
- 9.14 If you turn off cookies, the Pixel Tag will simply detect an anonymous website visit.

How 9 Spokes use cookies and Pixel Tags

- 9.15 9 Spokes itself does not use cookies, Pixel Tags or other technologies to track your use of other websites. 9 Spokes may, however, contract with other companies that may use cookies, Pixel Tags, and other online tools to collect information regarding your interaction with 9 Spokes advertisements and your use of both 9 Spokes and third-party websites. This information may be used to serve you 9 Spokes advertisements and other advertisements that may be of interest to you when you visit other web sites. For more information about this practice and to learn about your choices in connection with it, please visit <https://ico.org.uk/for-the-public/online/cookies/>.

Control of cookies

- 9.16 Web browsers allow you to exercise some control of cookies through the browser settings. Most browsers enable you to block cookies or to block cookies from particular sites. Browsers can also help you to delete cookies when you close your browser. You should note however, that this may mean that any opt-outs or preferences you set on our website will be lost. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit <http://www.allaboutcookies.org/> which includes information on how to manage your settings for the major browser providers.

10. THIRD-PARTY LINKS

- 10.1 This website (and 9 Spokes emails) contains links to other sites, including to those of the OSPs. If you follow a link to any of these websites, please note that these websites have their own privacy notices and 9 Spokes is not responsible for the privacy practices or the content of such websites. Please check these notices before you submit any personal data to these websites.
- 10.2 We may collect information from other sources, such as social media platforms that share information about how you interact with our social media content, and any information gathered through these channels will be governed by the privacy settings, policies, and/or procedures of the applicable social media platform, which we strongly encourage you to review.

11. SECURITY

- 11.1 9 Spoke stores personal information in electronic storage facilities and uses some physical records. We have taken numerous steps to protect your personal information from misuse, interference and loss, and unauthorised access, modification or disclosure.
- 11.2 Our information security policy is supported by a variety of processes and procedures, and we store information in access-controlled premises or electronic databases requiring logins and passwords. All employees, officers or contractors of 9 Spokes and third party providers

with access to confidential information are subject to access controls and confidentiality obligations, and we require our third-party data storage providers to comply with appropriate information security industry standards.

- 11.3 Whilst the company continually strives to ensure that our systems and controls are updated to reflect technological changes, the transmission of information via the internet is not completely secure, and as such we cannot guarantee the security of your data transmitted to our online services which is at your own risk.
- 11.4 If you communicate with us using a non-secure web platforms, you assume the risks that such communications between us are intercepted, not received, delayed, corrupted or are received by persons other than the intended recipient.
- 11.5 Once we have received your information, we will take reasonable steps to use procedures and security features to try to prevent unauthorised access, modification or disclosure.
- 11.6 You can help us to keep your information secure by ensuring that any user name or password in relation to our online services is kept strictly personal to you and not be made available to any other person. You should stop using your username and password and notify us immediately if you suspect that someone else may be using your user details or password.
- 11.7 While 9 Spokes uses encryption technology and a range of other security measures to protect your information, please be aware no security mechanism is 100% secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; 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.

12. REVIEWS

- 12.1 9 Spokes provides users with an opportunity to let it know about their experience; we may post their first name with their review without obtaining their consent and without reviewing the material. 9 Spokes is not responsible for any personal information that a user selects to include within their review.

13. YOUR RIGHTS - ACCESS AND CORRECTION OF YOUR PERSONAL INFORMATION

- 13.1 Under applicable data protection legislation, 9 Spokes has a duty of care to ensure that your personal data is accurate and up to date. You can contact us in accordance with [clause 16 \(Contacting Us\), to update or correct your information](#) or for some 9S Services you can update your details on-line.

- 13.2 Where you have consented to the company's processing of certain personal data, you can at any time withdraw such consent and/or tell us not to contact you with updates and information regarding our products and services (or part of them) either at the point such information is collected, (by checking the relevant box) or, where you do not wish us to continue to use your information in this way, by following the unsubscribe instructions on any communications sent to you. You can also exercise this right at any time by contacting us in accordance with [clause 16 \(Contacting Us\)](#).
- 13.3 You can request:
- (a) access to the personal data we hold about you;
 - (b) corrections or updates to your details;
 - (c) the erasure of your personal data;
 - (d) the portability of personal data that you have provided to us in a structured, commonly used and machine-readable format.
- 13.4 You also have the right to object to, or request the restriction of, our use of your personal data.
- 13.5 If you would like to exercise any of the rights set out in this section, please contact us using the details set out in [clause 16 \(Contacting Us\)](#). We may refuse to provide access where we have legitimate reasons for doing so under applicable data privacy laws, and in exceptional circumstances may charge a fee for access if the relevant legislation allows us to do so, in which case we will provide reasons for our decision.
- 13.6 You may submit a complaint to the office of the privacy commissioner in the jurisdiction in which we offer you the 9S Services to you. For example:
- (a) UK Information Commissioners Office <https://ico.org.uk/global/contact-us>
 - (b) New Zealand Privacy Commissioners Office <https://www.privacy.org.nz/>
 - (c) Canada Privacy Commissioners Office <https://www.priv.gc.ca/en/>
- 13.7 If you make a privacy complaint, we will respond to let you know how your complaint will be handled. We may ask you for further details, consult with other parties and keep records regarding your complaint.

14. DATA RETENTION

- 14.1 9 Spokes will retain your information no longer than is reasonably necessary to fulfil the purposes that such data was originally collected in accordance with our internal data retention policies or to comply with our legal and regulatory obligations.
- 14.2 A copy of our retention policy is available upon request. Should you wish to review our retention policy then please contact us in accordance with [clause 16 \(Contacting Us\)](#).
- 14.3 If you wish to request that we no longer use your information to provide you with services, contact us in accordance with [clause 16 \(Contacting Us\)](#). 9 Spokes will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

15. FURTHER INFORMATION

- 15.1 9 Spokes can, at your request, confirm what information we hold about you and how it is processed. If 9 Spokes does hold personal data about you, you can request the following information by contacting us using the details below:
- (a) identity and the contact details of the person or organisation that has determined how and why to process your data.
 - (b) the purpose of the processing as well as the legal basis for processing.
 - (c) if the processing is based on the legitimate interests of or a third party, information about those interests.
 - (d) the categories of personal data collected, stored and processed.
 - (e) recipient(s) or categories of recipients that the data is/will be disclosed to.
 - (f) how long the data will be stored.
 - (g) the source of personal data if it wasn't collected directly from you.
 - (h) 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.
- 15.2 In order to verify the identity of those who make a request to us, we will accept the following forms of valid ID when information on your personal data is requested:
- (a) Passport;

(b) Drivers licence, Birth certificate;

(c) Government issued ID.

16. CONTACTING US

16.1 If you have any questions or complaints about this Privacy Notice, 9 Spokes' privacy practices, your dealings with 9 Spokes, or you want to submit a written complaint about how we handle your personal data, please contact us via any of the following means:

Contact Email address: privacy@9spokes.com

UK Tel: 0800 316 1577

9 Spokes will make all reasonable attempts to respond to and resolve your enquiry or complaint.