

PRIVACY AND SECURITY POLICY

Cranberry Documents Limited t/a S2B Online (the “Company”, “We”, “Us”, “Our”) is committed to protecting and respecting your privacy.

This policy (together with our [terms of use](#) and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting <https://s2bonline.net> (our “Site”) you are accepting and consenting to the practices described in this policy.

For the purpose of the Data Protection Act 1998 (the “Act”), the data processor is Cranberry Documents Limited t/a S2B Online of 31 Church Road, Manchester, United Kingdom, M22 4NN.

1. INFORMATION WE COLLECT FROM YOU

We will collect and process the following data about you:

1.1 Information you give us

This is information about you that you give us by filling in forms on our Site or by corresponding with us by phone, email or otherwise. It includes information you provide when you register to use our Site, subscribe to our portal service, upload data and/or documents to the portal, participate in online chat facility and when you report a problem with our Site. The information you give us may include your name, job title, address, email address and phone number.

Please note that all payments and charges payable by you in relation to your use of the portal are taken via GoCardless, and are processed securely by GoCardless in accordance with its terms of service. For the avoidance of doubt, we do not receive any financial information about you or your business when you make any transactions in relation to the portal and we are not liable for any payments you make via the GoCardless payment service.

1.2 Information we collect about you

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

- technical information and your login information; and
- information about your visit, including download errors, documents and/or information uploaded to the portal and any phone number used to call our customer service number.

1.3 Information we receive from other sources

This is information we receive about you if you use any of the other websites we operate or the other services we provide. We are working closely 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 agencies). We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

2. COOKIES

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

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

We use the following cookies:

- **Strictly necessary cookies** - These are cookies that are required for the operation and security of our Site.
- **Analytical/performance cookies** - They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies** - These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies** - These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our Site more relevant to your interests.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie	Purpose	More information
Zendesk chat (CloudFlare) __cfduid	This cookie is used to override any security restrictions based on your IP address. This cookie is strictly necessary for our Site security operations.	https://www.cloudflare.com/
Hubspot analytics __hssrc	Whenever HubSpot changes the session cookie, this cookie is also set. We set it simply to the value "1", and use it to determine if the you have restarted your browser. If this cookie does not exist when we manage cookies, we assume it is a new session.	
Hubspot analytics __hstc	Cookie for keeping track of sessions. This is used to determine if we should increment the session number and timestamps in the __hstc cookie. It contains: the domain, viewCount	

	(increments each pageView in a session), session start timestamp.	
Zendesk __zlcmid	ZenDesk tracking cookie	https://www.zendesk.com/company/customers-partners/cookie-policy/
Google analytics _gid	Used to distinguish users.	
Google analytics _ga	Used to distinguish users.	
Hubspot analytics hubspotutk	This cookie is used to keep track of your identity. This cookie is passed to HubSpot on form submission and used when de-duplicating contacts.	
lo cookie	Socket.IO session id.	
remember-me	Random token and series number to identify persistent user logins.	

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

3. USES MADE OF THE INFORMATION

We use information held about you in the following ways:

3.1 Information you give to us

We will use this information:

- to administer and facilitate your subscription to, and use of, the portal;
- to contact you by email to highlight any outstanding issues highlighted/flagged on the portal task list;
- to make recommendations, discuss and agree bespoke action plans via the discussion board;
- to provide detailed reports on usage, audit trails and reporting in relation to your activity within your secure area of the portal for your user benefit. We can track actions such as view, download, create, update, delete and login information for all content, generate CSV reports and sort by group, date, content or user;

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. Although we will only provide such information to such third parties with your written consent;
- to notify you about changes to our service;
- to ensure that content from our Site is presented in the most effective manner for you and for your computer.

3.2 **Information we collect about you**

We will use this information:

- to administer our Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our Site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our Site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our Site about goods or services that may interest you or them.

3.3 **Information we receive from other sources**

We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

4. **DISCLOSURE OF YOUR INFORMATION**

4.1 We will only share your personal information with:

- our Data Processor, Rabbitsoft Ltd (t/a Clinked)
- our business partners (including Safety 2 Business Limited and Mentor Business Management Limited) in relation to the performance of any service agreement that you enter into with them;

- analytics and search engine providers that assist us in the improvement and optimisation of our Site; and/or
- GoCardless in relation to the facilitation of your payments via its platform.

4.2 We will disclose your personal information to third parties:

- if you authorise us to do so by providing us with your written consent;
- in the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets;
- if the Company or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets; and/or
- 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 [terms of use](#) and other agreements; or to protect the rights, property, or safety of the Company, our clients, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

5. WHERE WE STORE YOUR PERSONAL DATA

5.1 The data that we collect from you will be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

5.2 All information you provide to us is stored on our secure cloud solutions platform which is maintained by our third party software provider, Clinked t/a Rabbitsoft Ltd. Our third party software provider has the following measures in place to ensure secure access to the portal and the security of the data (to include documentation and information) uploaded to it:

- 256 bit SSL encryption for content access;
- Amazon AWS S3 data centres for the public and cloud solutions, which are ISO27001, SAS70 and PCI certified; and
- compliance with US federal government customer requirements by FISMA and FIPs certified.

5.3 Where we have given you (or where you have chosen) a user name and password which enables you to access certain parts of our Site, you are responsible for keeping this username and password confidential. We ask you not to share your username and password with anyone. As a subscriber to our portal, you have defined user permissions enabling appropriate viewing and editing rights for your members area.

- 5.4 Unfortunately, the transmission of information via the internet is not completely 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.
- 5.5 In the event of a Personal Data Breach, Processor (Rabbitsoft Ltd (t/a Clinked)) shall, without undue delay, inform Controller (Us) of the Personal Data Breach and take such steps as Processor in its sole discretion deems necessary and reasonable to remediate such violation (to the extent that remediation is within Processor's reasonable control).
- 5.6 In the event of a Personal Data Breach, Processor shall, taking into account the nature of the Processing and the information available to Processor, provide Controller with reasonable cooperation and assistance necessary for Controller to comply with its obligations under the GDPR with respect to notifying (i) the relevant Supervisory Authority and (ii) Data Subjects affected by such Personal Data Breach without undue delay.

6. YOUR RIGHTS

- 6.1 You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing at any time by contacting us at enquiries@s2bonline.net.
- 6.2 Our Site 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 (including GoCardless and Safety 2 Business), please note that 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. ACCESS TO INFORMATION

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request will be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

8. CHANGES TO OUR PRIVACY POLICY

Any changes we make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our Privacy Policy.

9. CONTACT DETAILS OF DATA PROTECTION OFFICER

Questions, comments and requests regarding this Privacy Policy and GDPR related enquiries are welcomed and should be addressed to our Data Protection Officer Simona Galabova at techsupport@s2bonline.net