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## PRIVACY POLICY FOR OUR SOFTWARE

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### BACKGROUND:

Power Vigilance Technologies Ltd understands that your privacy is important to you and that you care about how your information is used and shared online. We respect and value the privacy of everyone who uses Our Software and will only collect and use information in ways that are in a manner consistent with your rights and Our obligations under the law.

This Policy applies to Our use of any and all data collected by us in relation to your use of Our Software. Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Software. If you do not accept and agree with this Privacy Policy, you must stop using Our Software immediately.

### 1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

<b>“Software”</b>	means Our iOS and Android Apps, and pumaportal.com, and all releases and versions thereof. The Software also encompasses the downloadable programs for Windows, MacOS and Linux that are available from pumaportal.com.
<b>“We/Us/Our”</b>	means Power Vigilance Technologies Ltd a limited company registered in England under 08843118.

### 2. Information About Us

Our Software is operated by Power Vigilance Technologies Ltd, a limited company registered in England under 08843118 .

Our Data Protection Officer can be contacted by email at [info@powervigilance.com](mailto:info@powervigilance.com), or by post at The Robbins Building, Albert Street, Rugby, Warwickshire, CV21 2SD.

We are regulated by the Information Commissioner’s Office.

### 3. Scope – What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Software. It does not extend to any websites that are linked from Our Software. We have no control over how your data is collected, stored or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

### 4. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an

identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

## 5. **What Are My Rights?**

Under the GDPR, you have the following rights, which We will always work to uphold:

- 1.1 The right to be informed about Our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact Us to find out more or to ask any questions.
- 1.2 The right to access the personal data We hold about you.
- 1.3 The right to have your personal data rectified if any of your personal data held by Us is inaccurate or incomplete. Please contact Us to find out more.
- 1.4 The right to be forgotten, i.e. the right to ask Us to delete or otherwise dispose of any of your personal data that We have. Please contact Us to find out more.
- 1.5 The right to restrict (i.e. prevent) the processing of your personal data.
- 1.6 The right to object to Us using your personal data for a particular purpose or purposes.
- 1.7 The right to data portability. This means that, if you have provided personal data to Us directly, Us using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask Us for a copy of that personal data to re-use with another service or business in many cases.
- 1.8 Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about Our use of your personal data or exercising your rights as outlined above, please contact Us.

Further information about your rights can also be obtained from the Information Commissioner’s Office or your local Citizens Advice Bureau.

If you have any cause for complaint about Our use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office.

## 6. **Data Collected**

As stated in our Software Licence Agreement, Our Software should only be used by Our clients (parties who have entered a monetised contractual arrangement with Us). As such, Our Software does not collect any personal data from you. We do not place cookies on your computer or device, nor do We use any other means of data collection.

If you contact Us, We may collect your name, your email address, and any other information which you choose to give Us.

**7. How Do We Use Your Data?**

If We do collect any personal data, it will be processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times.

As stated above, We do not generally collect any personal data from our Software. If you contact Us and We obtain your personal details from your email, We may use them to respond to your email.

You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.

**8. How and Where Do We Store Your Data?**

We may store some or all of your personal data in countries that are not part of the European Economic Area (the “EEA” consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as “third countries” and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that We will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR as follows.

We will only transfer your personal data to countries that the European Commission has deemed to provide an adequate level of personal data protection. More information is available from the [European Commission](#).

**9. Do We Share Your Data?**

We may sometimes contract with third parties for data storage purposes. If any of your personal data is transferred to a third party, as described above, We will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, Our obligations, and the third party’s obligations under the law.

If any personal data is transferred outside of the EEA, We will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR.

In some limited circumstances, We may be legally required to share certain personal data, which might include yours, if We are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

**10. What Happens If Our Business Changes Hands?**

We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Data provided by users will, where it is relevant to any part of Our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use the data for the purposes for which it was originally collected by Us.

In the event that any of your data is to be transferred in such a manner, we do not undertake to contact you or inform you of that event.

## 11. **How Can You Control Your Data?**

If you want to know what personal data We have about you, you can ask Us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to Our email or postal addresses.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover Our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, We aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date We receive your request.

## 12. **Contacting Us**

If you have any questions about Our Software or this Privacy Policy, please contact Us by email at [info@powervigilance.com](mailto:info@powervigilance.com), or by post at The Robbins Building, Albert Street, Rugby, Warwickshire, CV21 2SD. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you.

## 13. **Changes to Our Privacy Policy**

We may change this Privacy Policy as we may deem necessary from time to time, or as may be required by law. You will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Software following the alterations. We recommend that you check this page regularly to keep up-to-date.