



Website Privacy Policy

Latest Revision 31 July 2018

Minerva Technologies Limited

At Minerva Technologies Limited (Minerva) we are dedicated to safeguarding and preserving your privacy when visiting our website (<https://minerva.com>) or communicating electronically with us (collectively “services”).

This Privacy Policy, together with our Terms and Conditions, provides an explanation as to what happens to any personal data that you provide to us, or that we collect from you.

Information We Collect

In operating our website and providing services, we may collect and process the following data about you:

1. Details of your visits to our website and the resources that you access, including, but not limited to, traffic data, location data, weblogs and other communication data.
2. Information that you provide by filling in forms on our website, such as when you registered to access or receive our services.
3. Information provided to us when you communicate with us for any reason.
4. Information provided to us when you request technical support.

The information we collect is generally restricted to your full name, home address, email, phone number, company name and payment details. We endeavor to only capture information that is necessary to provide our services in a practical and legally compliant way.

Your Rights

You have the right to access any personal information that Minerva processes about you and to request information about:

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to update/correct it as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing in accordance with data protection laws, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the relevant request; this is to ensure that your data is protected and kept secure.

Use of Cookies

On occasion we may gather information about your computer to facilitate usage of our services and to provide statistical information regarding the use of our website.

Such information will not identify you personally; it is statistical data about our visitors and their use of our website. This statistical data does not identify any personal details whatsoever.

Similarly to the above, we may gather information about your general internet use by using a cookie file. Where used, these cookies are downloaded to your computer automatically. This cookie file is stored on the hard drive of your computer as a cookie and contains information that is transferred to your computer's hard drive. They help us to improve our website and the services that we provide to you.

All computers have the ability to decline cookies. This can be done by activating the setting on your browser which enables you to decline the cookies. Please note that should you choose to decline cookies, you may be unable to access particular parts of our website.

Use of Your Information

The information that we collect and store relating to you is primarily used to enable us to provide our services to you. In addition, we may use the information for the following purposes:

1. To provide you with information requested from us, relating to our services and to provide information on other services which we feel may be of interest to you, where you have consented to receive such information.
2. To meet our contractual commitments to you.
3. To notify you about any changes to our website, such as improvements to our services.
4. To comply with "Know your Customer" (KYC) and "Anti Money Laundering" (AML) regulations applicable to the services we provide you.

If you are a new client, we will only contact you when you have provided consent and only by those means you provided consent for. You have the right to withdraw your consent at any time.

On occasion Minerva may retain the services of a third party contractor for the purposes of obtaining external expertise. In such circumstances we may permit (if deemed absolutely necessary) access to certain of our client's personal information, but only once they have agreed to treat such client information with the strictest levels of security and confidentiality.

What if I don't provide some or all of the information requested?

The impact of this will depend on what information you withhold, but the main impacts may be:

- Minerva is unable to provide you with services.
- Minerva is unable to contact you to let you know of issues with the services provided.
- Minerva will not be able to respond fully to requests and queries you may have

How Minerva protects your personal data

Data that is provided to us is stored on our secure servers. Details relating to any transactions entered into on our website will be encrypted to ensure its safety.

The transmission of information via the internet is not completely secure and therefore we cannot guarantee the security of data sent to us electronically and transmission of such data is therefore entirely at your own risk.

We take all appropriate security measures in line with market driven best practice to protect your personal information.

Who do you share my data with and why?

We will disclose your personal data in order to comply with any legal or regulatory obligation. This includes disclosing information to organisations for the purposes of fraud protection or on the order of a court.

On occasion Minerva may retain the services of a third-party contractor for the purposes of obtaining external expertise. In such circumstances we may permit (if deemed absolutely necessary) access to certain of our client's personal information, but only once they have agreed to treat such client information with the strictest levels of security and confidentiality.

How Long Do You Keep My Personal Data?

We will only hold your personal data for as long as it remains relevant to the services we provide to you.

Some of the information you provide to us will be necessary to carry out repeated tasks, we will keep such information for as long as you remain a client. After this time, we may need to retain personal data in order to meet legal and regulatory obligations on record retention or identify or resolve issues or causes of action.

In each case, the length of time that we need to keep the information may be different, but we will only keep the information for as long as it is required.

Third Party Links

You may find links to third party websites on our website. These websites should have their own privacy policies which you should check. We do not accept any responsibility or liability for their policies whatsoever, as we have no control over them.

Contacting Us

If you would like more information or would like to raise any queries with us in relation to your information, you can contact us by writing to the Data Protection Officer at gdpr@minerva.com or by mail at:

4 Athol Street, Douglas, Isle of Man, IM1 1LD

Changes to this Policy

We do update this Privacy Policy from time to time so please review this policy regularly. Any changes to this Policy will be noted here.

We may also let you know about changes to this policy by contacting you using your preferred method of communication as indicated by you to us.

Resolving Privacy Issues

We will always try our best to resolve any data privacy issue you may have. You do have the right to refer any data privacy issue to the Isle of Man Information Commissioner's Office at any time:

Isle of Man Information Commissioner

Address: First Floor, Prospect House, Prospect Hill, Douglas, Isle of Man, IM1 1ET

Phone: +44 1624 693260