

Privacy Policy – RedTitan Limited

This is our updated Privacy Policy going into effect on 10th May, 2018.

Your privacy is critically important to us. At RedTitan, we have a few fundamental principles:

- We are thoughtful about the personal information we ask you to provide and the personal information that we collect about you through the operation of our services.
- We store personal information for only as long as we have a reason to keep it.
- We aim to make it as simple as possible for you to control what information on our website is shared publicly (or kept private), indexed by search engines, and permanently deleted.
- We help protect you from overreaching government demands for your personal information.
- We will not share your personal details with any third-party companies, only RedTitan employees are able to access your information.
- We aim for full transparency on how we gather, use, and share your personal information.

Below is RedTitan's privacy policy, which incorporates and clarifies these principles.

1. Who We Are and What This Policy Covers

We are RedTitan Limited and RedTitan Technology Limited (for simplicity RedTitan in the rest of this document).

For the purposes of the relevant law RedTitan is both the data controller and data processor under the Data Protection Act registration Z7355057. The legal basis for the storage and processing by RedTitan under the [EU GDPR](#) of personal data provided by customers to RedTitan is Article 6(1)a&b (consent & necessary for the performance of a contract). We will keep this data until you request that it is removed, as we provide information about EscapeE and other RedTitan products. You have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

If you visit our web sites without logging in or providing personal data then we will record only your IP address, the date and time of your visit, the page(s) retrieved and the information about your computer sent automatically by your browser in an access log file under the legal basis of Article 6(1f) "processing is necessary for the purposes of the legitimate interests pursued by the controller or a third party". The legitimate interests are for the purposes of security investigation, statistical reporting and fault diagnosis only. We

cannot identify you from this data alone and we believe that it is exempt from data subject rights under articles 15 through 20 of the GDPR unless you provide further identifying data as described in article 11(2). We will keep these log records for 30 days unless it becomes necessary to preserve them as part of a security investigation in which case they will be retained for 5 years after the matter has been resolved.

The contact details of RedTitan to exercise your rights under the law to view your data, have it corrected or erased or to get a machine-readable copy are:

<https://www.redtitan.com/about.html>

You are entitled to exercise these rights free of charge and to receive a response within one month, subject to the exceptions in Article 12(5) of the EU GDPR for repetitive or manifestly unfounded requests. RedTitan reserves the right to require that you identify yourself before disclosing personal data in response to a request.

You are entitled to lodge a complaint with a supervisory authority if you are not satisfied with our response. The supervisory authority for the UK is the Information Commissioner's office which can be contacted via their helpline 0303 123 1113 or at <http://ico.org.uk/concerns/>

This Privacy Policy applies to information that we collect about you when you use:

- Any RedTitan websites
- Submit a request for technical support via our website or through an email.
- Submit a purchase order.
- Other products and services that are available on or through our websites

Throughout this Privacy Policy we'll refer to our website, mobile applications and other products and services collectively as "Services."

Below we explain how we collect, use, and share information about you, along with the choices that you have with respect to that information.

Please note that this Privacy Policy does not apply to any of our products or services that have a separate privacy policy.

If you have any questions about this Privacy Policy, please contact us.

2. Information We Collect

We only collect information about you if we have a reason to do so - for example, to provide our Services, to communicate with you, or to make our Services better.

We do not hold, and do not wish to hold, sensitive personal data within the special categories set out at article 9(1) of the EU GDPR which are personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, data concerning health or data concerning a natural person's sex life or sexual orientation and such data will be removed if found posted to the RedTitan forum unless such personal data are manifestly made public by the data subject (for example if someone writes that they are going to use our software at a church at which they are a member, it would be making their religion manifestly public).

We do not store or process genetic data or biometric data for the purpose of uniquely identifying a natural person.

We collect information in various ways: if and when you provide information to us, automatically through operating our services, and from outside sources. Let's go over the information that we collect.

2.1. Information You Provide to Us

It's probably no surprise that we collect information that you provide to us. The amount and type of information depends on the context and how we use the information. Here are some examples:

- Online software registrations: We require the following information to enable us to supply either a demonstration software licence or a licence purchased by yourself. The information required is as follows, your name, your email address, your company name, your company address, your company telephone and fax numbers, the RedTitan software unique ID. No other information will be collected when you register your software licence.
- Transaction and Billing Information: If you buy something from us – a product or service for example—you will provide additional personal and payment information that is required to process the transaction and your payment, such as your name, payment information, and contact information which are kept by our accounts department for accounting and audit purposes. **We do not store payment information on our servers.**
- Content Information: You may provide us with information about you in a forum post. For example, if you write a blog post that includes biographic information about you, we will have that information, and so will anyone with access to the Forum. Our forum is open for anyone to read or contribute-so it is better to choose what to write on the basis that it will become public. Please contact us via email to avoid exposing your information publicly.
- Communications with RedTitan: You may also provide us information when you respond to surveys, communicate with us about a support question, or post a question in our forums.

2.1. Information We Collect Automatically

We also collect some information automatically:

- **Log Information:** Like most online service providers, we collect information that web browsers, mobile devices, and servers typically make available, such as the browser type, IP address, unique device identifiers, language preference, referring site, the date and time of access, operating system, and mobile network information. We collect log information when you use our Services – for example, when you access any page in our forum or upload a file or picture.
- **Usage Information:** We collect information about your usage of our Services. For example, we collect information about the actions that site administrators and users perform on a site—in other words, who did what, when and to what thing on a site (e.g., [Forum username] deleted “[title of post]” at [time/date]). We also collect information about what happens when you use our Services (e.g., page views, button clicks) along with information about your device (e.g., IP Address). We use this information to, for example, provide our Services to you, as well as get insights on how people use our Services, so we can make our Services better.
- **Location Information:** We may determine the approximate location of your device from your IP address. We collect and use this information to implement access policies and to, for example, calculate how many people visit our Services from certain geographic regions. We may also end up storing information about your precise location (when, for example, you post a photograph with location information) to the forum.
- **Information from Cookies & Other Technologies:** A cookie is a string of information that a website stores on a visitor’s computer, and that the visitor’s browser provides to the website each time the visitor returns. Pixel tags (also called web beacons) are small blocks of code placed on websites and e-mails. RedTitan do not currently use cookies or Pixel tags in our web pages or emails.

3. How We Use Information

We use information about you as mentioned above and as follows:

- To provide our Services—for example, to set up and maintain your account, backup and restore our Forum, and moderate our Forum.
- To monitor and analyse trends and better understand how users interact with our Services, which helps us improve our Services and make them easier to use;
- To monitor and protect the security of our Services, detect and prevent fraudulent transactions and other illegal activities, fight spam, and protect the rights and property of RedTitan and others;

- To communicate with you about new products, offers and promotions offered by RedTitan, solicit your feedback, or keep you up to date on RedTitan's activities and services. **We do not send unsolicited e-mail to people who are not customers or former customers.**

4. Sharing Information

4.1 How We Share Information

We do not share or sell your private personal information with any third party organisation.

We share information about you in the limited circumstances spelled out below and with appropriate safeguards on your privacy:

- **RedTitan staff and Independent Contractors:** We may disclose information about you to our staff and individuals who are our independent contractors that need to know the information in order to help us provide our services or to process the information on our behalf. We require our staff and independent contractors to follow this Privacy Policy for personal information that we share with them.
- **Third Party Vendors:** We may share information about you with third party vendors who need to know information about you in order to provide their services to us. This group includes vendors that help us provide our services to you (like payment providers that process your payment information) and companies that provide components of our services (like backup storage, web hosting and internet bandwidth). We use only vendors whose terms include privacy commitments in order to share information with them.
- **As Required by Law:** We may disclose information about you in response to a warrant, court order, or other governmental request. We reserve the right to take legal advice in such circumstances.
- **To Protect Rights and Property:** We may disclose information about you when we believe in good faith that disclosure is reasonably necessary to protect the property or rights of RedTitan, third parties, or the public at large. For example, if we have a good faith belief that there is an imminent danger of death or serious physical injury, we may disclose information related to the emergency without delay.
- **Business Transfers:** In connection with any merger, sale of society assets, or acquisition of all or a portion of our business by another entity, or in the unlikely event that RedTitan goes out of business or enters bankruptcy, user information would likely be one of the assets that is transferred or acquired by a third party. If any of these events were to happen, this Privacy Policy would continue to apply to your information and the party receiving your information may continue to use your information, but only in ways consistent with this Privacy Policy.

- **With Your Consent:** We may share and disclose information with your consent or at your direction. For example, we may share your information with third parties with which you authorize us to do so.
- **Aggregated and De-Identified Information:** We may share information that has been aggregated or reasonably de-identified, so that the information could not reasonably be used to identify you. For instance, we may publish aggregate statistics about the use of our Services.
- **Published Support Requests:** If you send us a request (for example, via a support email or one of our feedback mechanisms), we reserve the right to publish that request in order to help us clarify or respond to your request or to help us support other users.

4.2 Information Shared Publicly

Information that you choose to make public is – you guessed it – disclosed publicly. That means, of course, that information like your public profile, posts, other content that you make public on our website are all available to others. Public information may also be indexed by search engines or used by third parties. Please keep all of this in mind when deciding what you would like to share.

5. Security

5.1 Security of our systems

While no online service is 100% secure, we work very hard to protect information about you against unauthorized access, use, alteration, or destruction, and take reasonable measures to do so.

5.2. Choices

You have several choices available when it comes to information about you:

- **Limit the Information that you Provide:** If you have an account with us, you can choose not to provide the optional account information, profile information, and social media information. Please keep in mind that if you do not provide this information, certain features of our Services may not be accessible.
- **Limit Access to Information On Your Computer or Mobile Device:** Your device operating system should provide you with the ability to discontinue our ability to collect operating system and browser identification via browser settings. If you do so, you may not be able to use certain features of the forum.

- **Opt-Out of Electronic Communications:** You may opt out of receiving messages from us. Just follow the instructions in those messages.
- **Set Your Browser to Reject Cookies:** At this time, RedTitan does not use cookies.

6. Other Things You Should Know (Keep Reading!)

6.1. Transferring Information

The Internet is a worldwide service. By accessing or using the services or otherwise providing information to us, you consent to the processing, transfer, and storage of information in and to the U.K. and other countries, which may have rights and protections that are different from those in your home country. The servers operated by RedTitan may be in the UK as well as other locations, the permanent copy of your data is located in the UK but RedTitan staff may access it via the Internet from potentially anywhere.

6.2. Advertisements and Analytics Services Provided by Others

RedTitan do not use 3rd part advertisements in the normal course of business.

6.3. Third Party Software

If you'd like to use third party software like plugins with our Services, please keep in mind that when you interact with them you may provide information about yourself to those third parties. We don't own or control these third parties and they have their own rules about collection, use and sharing of information. You should review their rules and policies when installing and using third party software.

6.4 Web Links

The forum software allows members to post links to other web sites. If you follow these links to another web site please note that we do not have control of that web site. Therefore, we cannot be responsible for the content of that web site or for the protection of any information that you may provide to that website or any information about you which it may collect automatically. Other sites are governed by their own privacy statement which you should examine before providing any information to them.

RedTitan can only remove links to dangerous or unsuitable content once we have become aware of them.

7. Privacy Policy Changes

Although most changes are likely to be minor, RedTitan may change its Privacy Policy from time to time. RedTitan encourages visitors to frequently check this page for any changes to its Privacy Policy. If we make changes, we will notify you by revising the change log below, and, in some cases, we may provide additional notice (such as adding a statement to our homepage or sending you a notification through e-mail or the forum). Your continued use of the Services after any change in this Privacy Policy will constitute your consent to such change.

8. Change log

1st April, 2018:

Adapted from [Automattic/Wordpress](#) Template for RedTitan Website.

11th April, 2018

Updated 'How We Share Information' section

3rd May, 2018:

Fixed some typos.

One More Thing:

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