



## Duel Privacy Policy

Duel Holdings Limited, trading as Duel, (**Duel, we, our, us**) are committed to protecting and respecting your privacy.

This privacy policy (together with our terms of use as set out at [www.duel.tech](http://www.duel.tech) (Terms) applies to your use of:

- the Duel website ([www.duel.tech](http://www.duel.tech)) and platform, including via the site [app.duel.me](http://app.duel.me), [duel.me](http://duel.me), or any micro-site hyperlink provided by a brand; and
- any other websites, products, services or electronic documents offered by us,

(together, “the Sites”)

unless we state that a separate privacy policy applies to a particular service, in which case that privacy policy only applies.

This privacy policy describes how Duel collects and uses the personal data about you. It also describes the choices available to you regarding our use of your personal data and how you can access and update this data. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

If you have any questions about this privacy policy or our processing of your personal information, please contact Duel’s Data Protection Representative (see **Contact** below).

For the purpose of the Data Protection Act 2018, the General Data Protection Regulation (EU) 2016/679 and any subsequent UK data protection legislation (the “Data Protection Legislation”), the data controller is Duel Holdings Limited. (Duel) of 21 Lombard Street, London EC3V 9AH and we are responsible for, and control the processing of, your personal information.

By providing us with your personal data or accessing the Sites, you acknowledge and agree that we may use that data in accordance with this privacy policy.

## INFORMATION WE COLLECT FROM YOU

### Information provided by you

- You may give us information about you (such as name, email address, telephone number, business title, company name and Internet Protocol (IP) address) when you contact us (for example, by e-mail, phone or chat) including, but not limited to, when purchasing or enquiring about our services, sending us feedback, reporting a problem with our services, applying for a vacancy etc.

### Information we automatically collect about you and your device

- Each time you visit our Site(s) we may automatically collect the following information: details of your visits to our Site(s) including, but not limited to, traffic data, location data, weblogs and other communication data, and the resources that you access. See **Cookies** below.

### Information we receive from other sources

- We are working closely with third parties (including any companies within our group, and analytics providers such as Google Analytics - [Google Privacy Policy](#) and IPInfo) and may receive information about you as described above. Where relevant, we may also receive information about you from recruiters and your referees. We are using the YouTube API services. In the event that you are submitting content from YouTube, under the [Google Privacy Policy](#).

## COOKIES

We use cookies to distinguish you from other users of the Sites. This helps us to analyse trends, administer our services, track users' movements around our services, gather demographic information about our user base as a whole, all so that we can provide you with a good user experience. By visiting and using any of our Site(s), you agree to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser, computer, or device. We may use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our services. They include, for example, cookies that enable you to log into secure accounts, use interactive features and services.
- **Analytical/performance cookies.** These allow us to recognise and count the number of visitors and users and see how they use our services. This helps us to improve the way our Sites work, 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 Sites. 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 Sites, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests.

Please note that third parties (analytics providers such as Google Analytics and IPInfo) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You can 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 Sites or the services.

## **USE OF PERSONAL INFORMATION**

Client contacts: We use the personal information we have collected from you to provide you with information about and access to our services, to communicate with you about updates, maintenance, outages or other technical matters concerning our services, to respond to your questions or inquiries regarding our services and to allow you to download information such as whitepapers, all to fulfil our contractual obligations.

In addition to the general provision of our services, and the specific uses of information we described above, we also use information in the following ways:

- to help you access your or your business' information and account settings after you have signed into your account;
- to provide customised and personalised content and information to you;
- to enable us to provide, test, improve and update our services and Sites, and monitor the performance and effectiveness of our services, Sites and specific functionalities;
- to enable us to develop and test new products, services and features;
- to enable us to identify, diagnose and fix any defects or errors;
- for monitoring purposes, including metrics data;
- to provide you with information about other goods and services we offer that are similar to the services we provide to you;
- conduct research, statistical analysis and behavioural analysis;
- detect and prevent fraud;
- notify you of any changes to our Sites or to our services that may affect you;
- for recruitment purposes.

We may associate any category of information with any other category of information and will treat the combined information as personal data in accordance with this policy for as long as it is combined.

We do not disclose information about identifiable individuals to big data platforms such as BlueKai, but we may provide them with anonymous aggregate information about you.

## **MARKETING**

We may, from time to time, send you information by post, email and telephone about our products and services, competitions and special offers which may be of interest to you.

We will only ask whether you would like us to send you marketing messages when you tick the relevant boxes to say you agree.

We may send marketing emails to you as a business contact where we believe we have legitimate interests for doing so. You will always have the option to opt-out from such future marketing communications.

If you have consented to receive marketing from us, or other businesses, you can opt out at any time. See 'Your Rights' below for further information.

## **LEGAL BASIS FOR PROCESSING YOUR DATA**

We may process your data because:

- we are legally obliged to e.g. to confirm your identity;
- the processing is necessary for the performance of the contract with you, your business or your employer to provide our services; or
- it is in our legitimate business interests to do so.

In some instances, we will rely on your consent to process personal data and where we do this, it will be flagged to you at the time.

## **YOUR RIGHTS INCLUDING ACCESS TO AND DELETION OF YOUR PERSONAL INFORMATION**

The Data Protection Legislation gives you a number of rights in relation to your personal data. These include the right to:

- find out how we process your data;

- request that your personal data is corrected if you believe it is incorrect or inaccurate;
- obtain restriction on our, or object to, processing of your personal data;
- if we are relying on consent, you can withdraw your consent to our processing of your personal data;
- if we are relying on legitimate interests for direct marketing, you can object to receiving such direct marketing;
- obtain a copy of the personal data we process concerning you. Once we have verified your identity we will respond as soon as possible and in any event within one month;
- lodge a complaint with the UK supervisory body, the Information Commissioner's Office (the ICO) here <https://ico.org.uk/>. If you have a concern or complaint about the way we handle your data, we ask that you contact us in the first instance to allow us to investigate and resolve the matter.

If you would like to exercise any of your rights, please contact us via <https://duel.tech/>, or by emailing us at [dpo@duel.tech](mailto:dpo@duel.tech). We will aim to respond to your request within 28 days once we have verified your identity.

As mentioned above, you have the right to ask us not to process your personal information in certain circumstances, such as for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at <https://duel.tech/>.

Our Sites and services may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates (including, but not limited to, websites on which our services are advertised). If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any personal data to these websites or use these services.

## **SHARING OF YOUR PERSONAL INFORMATION**

We may disclose your Personal Information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request.
- In order to:
  - enforce or apply our Terms and other agreements or to investigate potential breaches; or
  - protect the rights, property or safety of Duel, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- Who help us provide the services to you. Below, we describe which third parties we partner with, what personal information we share with each partner and the purpose of processing the personal information:

<b>Internal Technology Partners</b>	<b>Personal Information Shared</b>	<b>Purpose of Processing</b>
Hubspot	Name Email address Telephone number Address Business title	For fulfilment of contractual obligations and client communication
MailChimp	Name Email address Business title Company name	For marketing purposes to clients and prospects
Amazon AWS	Contact Details, Personal Details, Lifestyle Details, Visual Images, Location Details, IP Address	Providing Services, Contractual Obligation
Heroku (Salesforce)	Contact Details, Personal Details, Lifestyle Details, Visual Images, Location Details, IP Address	Providing Services, Contractual Obligation
MongoDB	Contact Details, Personal Details, Lifestyle Details, Visual Images, Location Details, IP Address	Providing Services, Contractual Obligation
Elastic Cloud	Contact Details, Personal Details, Lifestyle Details, Visual	Providing Services, Contractual Obligation

	Images, Location Details, IP Address	
Cloudflare	Contact Details, Personal Details, Lifestyle Details, Visual Images, Location Details, IP Address	Providing Services, Contractual Obligation
Mandrill (Mailchimp)	Name, Email	Providing Services, Contractual Obligation
PayPal	Name, Email	Providing Services, Contractual Obligation
Papertrail (SolarWinds)	Email	Internal Administration, Providing Services

- Who you interact with via the services and/or confirm that you wish to be contacted by.

## **STORING AND SECURING YOUR PERSONAL INFORMATION**

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

All information you provide to us is stored on our secure servers (such Amazon Web Servers). Where we have given you (or where you have chosen) a password that enables you to access certain parts of our Sites or our services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

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 Sites, or via any other service; 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.

We may collect and store personal data on your device using application data caches and browser web storage (including HTML 5).

## **HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?**

We keep your personal information for as long as we need to for the purposes for which it was collected or (if longer) for any period for which we are required to keep personal information to comply with our legal and regulatory requirements.

## **CHANGES TO PRIVACY POLICY**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail or when you next visit the Sites, or log onto one of our services. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the Sites, or our services.

## **CONTACT**

Questions, comments and requests regarding this privacy policy are welcomed and can be submitted via our contact form at <https://duel.tech/> or by contacting us at [dpo@duel.tech](mailto:dpo@duel.tech), or at:

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