

Document Revision History

Revision	Date	Description	Author
1.0	17-May-2021	Initial Draft and review	MG/HR
	21-Sep-22	Approved by CISO	HR
1.1	08-Feb-24	Reviewed IAW ISO 27001:2022 Revision Reference updated with ISO Control	RN/JAF
	08-Mar-24	Approved by CISO	HR
1.2	31-Jan-25	Updated Conduce Address	JAF
		Approved by CISO	HR
1.3	29-Apr-25	Updated Section 4. Data we collect Section 5. How do we collect Data Section 13. What types of Cookies do we use	JAF/TQ/JR
	01-May-2025	Approved by CISO	HR

1. References

- ISO/IEC 27002:2022 (E) – Control 5.10 Acceptable use of information and other associated assets

2. Introduction

This Privacy Policy sets out the Agreement between you, the user of the Conduce Website (Website) and Conduce Group Limited (We/Us), the owner and provider of this Website. We take the privacy of your information very seriously. This Privacy Policy applies to any and all data collected by us or provided by you concerning your Website use.

This Privacy Policy should be read alongside, and in addition to, our Terms and Conditions, which can be found on the Website.

3. Scope of this Privacy Policy

This Privacy Policy applies only to the actions of Conduce Group Limited and Users concerning this Website. It does not extend to any websites that can be accessed from this Website, including, but not limited to, any links we may provide to social media websites.

For purposes of the applicable data protection laws, we are the "data controller". This means that We determine the purposes for which and the manner in which your Data is processed.

4. What Data Do We Collect?

We may collect the following data, which may include personal data, from you:

- Name
- Tel. No.
- Email addresses

- IP address
- Company
- Job Title

5. How Do We Collect Data?

We collect data in the following ways:

- You provide us with data when you access any of the videos we have uploaded to the Website.
- We automatically collect some information about your visit to the Website, including your IP address, the date, times, and frequency with which you access the Website and how you use and interact with its content.
 - You provide us with data when you submit the form on the <https://www.conduce.net/book-a-demo/> page of our Website.
 - You provide us with data when you submit the form on the <https://www.conduce.net/contact/> page of our Website.

Henceforth this Data will be collectively referred to as "the Data".

6. How Do We Use Data?

We may use any or all of the Data at our discretion to run analytics on the Website's functionality. This will help us improve and refine our Website's content, design, and layout and ensure that the Website's content is presented most effectively for you and your computer.

We do not use your data for marketing, microtargeting, or advertising purposes, means, or activities. We do not use profiling or automated decision-making processes.

7. Data Sharing

We partner with Microsoft Clarity and Microsoft Advertising to capture how you use and interact with our website through behavioural metrics, heatmaps, and session replay to improve and market our products/services. Website usage data is captured using first and third-party cookies and other tracking technologies to determine the popularity of products/services and online activity. Additionally, we use this information for site optimization, fraud/security purposes, and advertising. For more information about how Microsoft collects and uses your data, visit the [Microsoft Privacy Statement](#).

Additionally, articles on the Website may include embedded content (e.g. videos, images, articles, etc.) from other websites. This content behaves exactly as if the visitor were visiting such other websites.

8. Data Security

We store Data on secure servers in the UK. We have technical and organisational measures to respond to any suspected data breach. If you suspect any misuse, loss, or unauthorised access to your Data, please let us know immediately via info@conduce.net.

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data, we shall promptly assess the risk to any personal rights and freedoms if appropriate, report this breach to the Information Commissioners Office (ICO). Please find more information on the ICO website.

We will not share, sell, or distribute any of the information you provide to us without your consent, except where the law requires disclosure.

For further detailed information on protecting your information and your computers and devices against fraud, identity theft, viruses, and many other online problems, we recommend visiting www.getsafeonline.org.

9. Data Storage

Unless a more extended retention period is required or permitted by law, we will only retain your Data for the period necessary to fulfil the purposes outlined in this privacy policy or until you request that the Data be deleted. This can be requested via the Form on 'Contact' page on the Website.

Even if we delete your Data, it may persist on backup or archival media for legal, tax or regulatory purposes.

10. What Are Your Data Protection Rights?

You have the following rights:

- Right to access - the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update, or delete such information. If we provide you with access to the information we hold about you, we will not charge you for this unless your request is "manifestly unfounded or excessive." We may refuse your request where we are legally permitted to do so. If we reject your request, we will tell you the reasons why.
- Right to correct - the right to have your Data rectified if it is inaccurate or incomplete.
- Right to erase - the right to request that we delete or remove your Data from our systems.
- Right to restrict our use of your Data - the right to "block" us from using it or limit how we can use it.
- Right to data portability - the right to request that we move, copy, or transfer your Data.
- Right to object - the right to object to your data use, including where we use it for our legitimate interests.

11. Cookies

A cookie is a small text file that a website stores on your computer or mobile device, storing information about your visit.

12. How Do We Use Cookies?

We use cookies to improve your experience using the Website. We have carefully chosen these Cookies and have taken steps to ensure that your privacy is protected and respected. All cookies used by our Website are used under the current UK Cookie Law.

13. What Types of Cookies Do We Use?

This Website has placed the following cookies:

Type of cookies	Cookie	Purpose
Third-party cookies	Microsoft Clarity	<p><i>We partner with Microsoft Clarity and Microsoft Advertising to capture how you use and interact with our website through behavioural metrics, heatmaps, and session replay to improve and market our products/services. Website usage data is captured using first and third-party cookies and other tracking technologies to determine the popularity of products/services and online activity. Additionally, we use this information for site optimization, fraud/security purposes, and advertising. For more information about how Microsoft collects and uses your data, visit the Microsoft Privacy Statement.</i></p>

14. How to Manage Cookies?

You can choose to enable or disable cookies in your internet browser. Most internet browsers accept cookies by default, but this can be changed. For further details, please consult the help menu in your internet browser.

You can choose to delete cookies at any time. However, you may lose any information that enables you to access the Website more quickly and efficiently, including, but not limited to, personalisation settings.

It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

For more information generally on cookies, including how to disable them, please refer to aboutcookies.org. You will also find details on how to delete cookies from your computer.

15. Links to Other Websites

This Website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites. Before using them, you are advised to read other websites' privacy policies or statements.

16. Changes to this Privacy Policy

We reserve the right to change this Privacy Policy from time to time or as the law requires. Any changes will be immediately posted on the Website. You are considered to have accepted the terms of the privacy policy on your first use of the Website following the alterations.

17. General

You may not transfer any of your rights under this Privacy Policy to any other person. We may transfer our rights under this Privacy Policy, where we reasonably believe your rights will not be affected.

This Agreement will be governed by and interpreted according to the law of England and Wales. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.

18. Contact Us

To make enquiries or exercise any of your rights as set out above, please contact us:

- Email us at info@conduce.net
- Call us at +44 (0)333 888 4044
- Write to us at 19 Silvermills Court, Henderson Place Lane, Edinburgh, EH3 5DG, United Kingdom

19. How to contact the appropriate authority?

We are a mobile aviation solutions company incorporated under English and Welsh law. Given this jurisdiction, the UK's Information Commissioner's Office (ICO) is the relevant authority you can address if you are not satisfied with how we handle a complaint you make about your Data. The ICO's contact details can be found at <https://ico.org.uk/>.