

Privacy Policy for Dot Brand Observatory Website

Nom-IQ Limited t/a Com Laude (a Com Laude Group company) (**we, us or our**), is committed to protecting and respecting your privacy.

This policy (together with our terms of use <http://observatory.domains/terms-of-use/> and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us, regardless of the location from which you visit our website (<http://observatory.domains> (**Site**)). Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

You can download a PDF version of the policy here: <https://observatory.domains/privacy-policy/>.

1. Purpose

This policy gives you information on how we collect and processes your personal data through your use of this Site, including any data you may provide through this Site when you sign up or subscribe to receiving our news flashes or to request our services or an assessment.

This Site is not intended for children or for individual consumers and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

2. Controller

Nom-IQ Limited t/a Com Laude is part of the Com Laude corporate group. This privacy policy is issued on behalf of the Com Laude Group so when we refer to “we”, “us” or “our” we are referring to the relevant company in the Com Laude Group responsible for processing your data. Nom-IQ Limited t/a Com Laude is the controller and responsible for this Site.

If you have any comments about this privacy policy or our privacy practices, please Nom-IQ Limited t/a Com Laude, 28-30 Little Russell St, London WC1A 2HN, United Kingdom or email legal@comlaude.com headed “Privacy”.

3. Changes to this policy

We keep our privacy policy under regular review and any historic versions can be obtained by us by contacting us on the details set out above. This version was last updated on 23 October 2019. Any changes we may make to our privacy policy in the future will be posted on this page.

4. Personal Data

Personal data means any information about an individual from which that person can or could be identified. It does not include data where the identity of the person has been removed (i.e. anonymous data).

5. Updating data

It is important that the data we do hold about you is accurate and current. Please keep up informed if your personal data changes during your relationship with us.

6. Information we may collect from you and our lawful basis for processing

We may collect, use, store and transfer the following data about you:

- **Identification Data** which includes data you provide us by filling in forms on our Site (including our “contact us” form when you request an assessment service from us. From these we identify you from the information you provide such as your title, first name, last name, email address, username or similar identifier.
- **Contact Data** which includes your email address.
- **Technical Data** which includes your internet protocol address, your login data, browser type and version, time zone setting and location, browser plug-in types, cookies, and version, operating system and platform and other technology on the device you use to access this Site. For further information on our use of cookies and similar technologies, please see our cookie policy <https://observatory.domains/dot-brand-observatory-cookie-policy/>.
- **Profile Data** which includes your username and password and your interests.
- **Usage Data** which includes how you use our Site and what you click on.
- **Marketing and Communications Data** which includes your preferences in receiving marketing from us and our group as well as your communication preferences. If you contact us, we may keep a record of that correspondence.

We do not collect any special categories of personal data about you (e.g., physical or mental health, race or ethnic origin, religious/similar other beliefs, criminal convictions, sexual orientation etc.).

We may collect, use and share aggregated data such as statistical or demographic data for marketing purposes. Whilst this aggregated data could be derived from your personal data it is not considered personal data in law as it will not directly or indirectly reveal your identity. Yet, if we ever combine aggregated data with your personal data, we treat this as personal data, and this will be used in accordance with this privacy policy.

7. How do we collect your data?

We may collect your data in various ways. We will receive your data directly if you provide it via our online forms, by entering a survey on our Site or if you request to subscribe to our news flash bulletins or request our assessment service.

8. Uses made of the information

We will only use your personal data when the law allows us to. We use information held about you in the following ways:

Purpose of processing your personal data	Lawful basis for processing your personal data
To notify you of changes to our terms or privacy policy or any other changes to our site	Necessary to comply with a legal obligation and for our legitimate interests (i.e. to maintain updated records and study how clients would use our products and services)
To ask you to take part in a survey or participate in interactive features of our Site	Performance of a contract with you and necessary for our legitimate interests in developing and growing our business
To ensure the content on our Site is presented in the most effective manner for you and for your computer	Necessary for our legitimate interests (i.e. to ensure you can use our Site efficiently and that we can provide you with information on our

	products and services)
To provide relevant Site content and to measure and understand how effective such content is	Necessary for our legitimate interests (i.e. to study how you use and interact with our Site)
To make recommendations to you about our products and services or provide you with information on our products and services that you request from us	Necessary for our legitimate interests (i.e. to grow and develop our business)
To send you news flash bulletins on our industry and our products and services or to provide you with our assessment service	Necessary for our legitimate interests (i.e. to grow our business) and necessary for the performance of a contract with you

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law. If you want any further details on the purpose for which we process your personal data, please contact us on the contact details below.

The lawful basis upon which we process your personal data is where we are processing your data for the purposes of a legitimate interest pursued by us, except where such interests are overridden by your interests or fundamental rights and freedom which require the protection of your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending direct marketing communications to you via email or by requesting your consent on our request forms. You have the right to withdraw consent to marketing or communications at any time by contacting us via the contact details below. Or you can select “unsubscribe” on any of our marketing communications.

If you are an existing client, we will only contact you by electronic means (e-mail) with information about goods and services similar to those which were the subject of a previous sale to you.

If you are a new client, we will contact you by electronic means only if you have consented to this.

9. Marketing and Promotional Offers

We shall request your consent to provide you with any marketing or promotional offers. You will receive marketing communications from us if you have requested information from us and you have not opted out of receiving that marketing. You can ask us to stop sending you marketing messages at any time by contacting us at any time on the contact details below or unsubscribing from our communications using the link in emails we send to you.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

10. Cookies

You can set your browser to refuse all or some browser cookies to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our Site may become inaccessible or not function properly. For more information about the cookies we use please see our cookie policy <https://observatory.domains/dot-brand-observatory-cookie-policy/>.

11. Who your information might be shared with

We may disclose your personal data to:

- other companies within our corporate group to the extent necessary for the purposes set out above;
- ICANN, domain name registries and suppliers to provide our services;
- law enforcement agencies in connection with any investigation to help prevent unlawful activity;
- third parties if we are under a duty to disclose or share your personal data to comply with any legal obligation, or to enforce or apply our terms of use <http://observatory.domains/terms-of-use/> and other agreements; or to protect the rights, property, or safety of Nom-IQ Limited or other entity in the Com Laude Group, our clients, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction; and
- third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

The companies in the Com Laude Group to whom we may disclose your data are:

- Nom-IQ Limited t/a Com Laude;
- Valideus Limited;
- Demys Limited;
- Consonum, Inc.; and
- Com Laude (Japan) Corporation.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

12. Transfers of your information out of the European Economic Area (EEA)

We may need to transfer your personal data to our group's offices outside the EEA (e.g. United States of America or Japan), to the extent necessary for the provision of our services. In addition, to provide our services, we may need to transfer your personal data to ICANN, domain name registries and our suppliers, all of which are based around the world. To the extent your personal data will be transferred outside the EEA to a country which has not been recognised by the European Commission as having an adequate level of protection, we will ensure that the transfer is subject to appropriate safeguards or derogations under the applicable data protection laws. This includes ensuring that we have standard contractual clauses with our US entity and having appropriate data protection contractual language with any third party with whom we may share your data.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

13. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We restrict access

to your personal data to those staff members of ours or our group companies who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

14. Your legal rights

Under the data protection laws you have the following rights in relation to your personal data:

- **the right to access:** you can obtain confirmation from us as to whether we process your personal data and, where we do, access to such personal data, together with certain additional information.
- **the right to rectification:** you can ask for any inaccurate personal data about you to be rectified and, considering the purposes of the processing, to have any incomplete personal data about you completed. We shall do this without any undue delay.
- **the right to erasure (“right to be forgotten”):** you can ask us to erase your personal data and we shall do so without any undue delay.
- **the right to restrict processing:** you can ask us to restrict the processing of your personal data in some circumstances.
- **the right to object to processing:** where the lawful basis of us processing your data is that it is necessary for a legitimate interest, you can object to the processing of your personal data on grounds relating to your particular situation in certain circumstances. In these circumstances, we shall stop processing your personal data unless we have compelling legitimate grounds for processing such data which overrides your interests, or if we need to process the data in relation to a legal claim. Where we process your personal data for marketing purposes, you have the right to object at any time.
- **the right to data portability:** where the legal basis for our processing of your personal data is consent, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. This right does not apply where it would adversely affect the rights and freedoms of others.
- **the right to complain to a supervisory authority:** if you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement. The supervisory authority in the UK is the Information Commissioner’s Office (ICO) (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach a supervisory authority so please contact us in the first instance.
- **the right to withdraw consent:** to the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

You can exercise any of your rights at any time by written notice to us at 28-30 Little Russell Street, London, WC1A 2HN, United Kingdom or by email to legal@comlaude.com, headed “Privacy”.

Our Site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own terms of use and privacy policies and that we do not accept any

responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

We may, from time to time, link to our other websites. These have their own terms of use and privacy policies.