

Cohort plc

The independent technology group

Privacy and Cookies

At Cohort plc, we take your privacy seriously and this privacy statement explains what personal data or information we collect from you and from people who visit our website and how we use it. We would encourage you to read the list below and click on 'learn more' if you would like more information on a specific topic.

We may change this information from time to time, so please check this page occasionally to ensure you're happy with any changes. This privacy statement was last updated on 16 May 2018.

If you have any questions regarding this statement and our privacy practices, please contact us by email dpl@Cohortplc.com or by post at Cohort plc, 2 Waterside Drive, Arlington Business Park, Theale, Reading, RG7 4SW. Alternatively, you can telephone us on +44 118 909 0390.

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Who are we?

Cohort plc is a registered company (05684823) our registered office address is 2 Waterside Drive, Arlington Business Park, Theale, Reading, RG7 4SW. The Cohort Group includes our Trading Subsidiaries, MASS Consultants Limited, Systems Engineering & Assessment Ltd (SEA), Marlborough Communications Limited (MCL) and Empresa de Investigação e Desenvolvimento de Electrónica, S.A. (EID), Systems Consultants Services Limited (SCS). In this document, 'We', 'Us', 'Our' or the 'Group' includes Cohort plc and its trading subsidiaries as listed above.

Cohort plc is a registered data controller (ZA298119).

What personal data or information do we collect?

The personal information we collect may include:

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Identity Data	first name, last name, title, job title
Contact Data	billing/contact address, delivery address, email address, telephone numbers
Financial Data	bank account, billing and payment details
Contract Data	details about contract agreements or proposed agreements between us
Transaction Data	details about payments to and from you. Details of products and services you have purchased from us or supplied to us
Profile Data	purchases or orders made by you, feedback and survey responses
Technical Data	internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website
Usage Data	information about how you use our website, products and services
Marketing and Communications Data	your preferences in receiving marketing communications from us and/or our third parties, and your communication preferences

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

[If you fail to provide personal data](#)

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

[How is your personal data or information collected?](#)

We may collect data or information about you when you:

- make an enquiry about our products, services or business activities of Cohort plc or our trading subsidiaries
- become a shareholder of Cohort plc
- become a supplier to Cohort plc
- enquire about a job opportunity at Cohort plc or our trading subsidiaries
- use the Cohort plc website

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- register to be sent an email news update or RNS alert from the Cohort plc website
- provide a business card or contact details in another form to one of our Cohort plc or trading subsidiary employees in person eg. at a meeting or event

How is your information used?

We collect your personal data or information to operate our business effectively and provide you with the best information on the products and services from across the Group.

We may use your information:

- To carry out our obligations arising from any contract or contract negotiations entered into by you or us as client or prospective client of Cohort plc or our Trading Subsidiaries
- To process an enquiry that you have made to us or our Trading Subsidiaries
- To contact you to discuss business opportunities or products and services from our Trading Subsidiaries that we believe may be of interest to you
- To send you communications that you have requested, for example our email news alert
- To process a job application
- To conduct the due diligence and negotiations required as part of a potential or actual business merger or acquisition
- To process our obligations associated with AIM Regulations and our shareholders
- To invite you to events run by Cohort plc and our Trading Subsidiaries

We believe that all these purposes are justified on the basis of our legitimate interests in running and promoting our business, the contractual obligations of our Trading Subsidiaries to deliver products and services to you, and our legal obligations as appropriate. We may also use your personal data to send you information, such as an email news update which you have signed up to receive and can opt-out from at any time.

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Purpose / Activity	Type of data held	Length of time data held	How data held
As a client or agent of our Trading Subsidiaries (including SCS)	<ul style="list-style-type: none">• Identity data• Contact data• Contract information• Financial information• Transaction data• Information and documents relating to the products / services we are providing, including communications with you• Your communications & marketing preferences	6 years after expiry of contract	Business administration and communications systems held on secure UK servers
Prospective clients of our Trading Subsidiaries (for example during a bid or tender process)	<ul style="list-style-type: none">• Identity data• Contact data• Contract information• Financial information• Information and documents relating to the products / services we are discussing, including communications with you	The lesser of 6 years or when the warranty expires	Business administration and communications systems held on secure UK servers
Suppliers of products & services to Cohort plc (including Business Advisors)	<ul style="list-style-type: none">• Identity data• Contact data• Contract information• Transaction data• Information and documents relating to the products / services you are providing, including communications with you	6 years after expiry of contract	Business administration and communications systems held on secure UK servers

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<p>Current or prospective trade/commercial partners (eg. Business Advisors and Companies as part of an acquisition or merger)</p>	<ul style="list-style-type: none"> • Identity data • Contact data • Names of Shareholders • Company Director details, including CVs & contracts • Commercial information, including supplier & customer contract details • Information and documents relating to negotiations including communications with Advisors 	<p>As specified by the relevant Non-Disclosure Agreement</p>	<p>Business administration and communications systems held on secure UK servers</p>
<p>Fund managers or individuals holding shares in Cohort plc</p>	<ul style="list-style-type: none"> • Name • Contact information (Fund Managers only) • Shareholding details 	<p>Permanently</p>	<p>Business administration and communications systems held on secure UK servers</p>
<p>Interested financial investors (eg. to be sent our financial reports or RNS updates)</p>	<ul style="list-style-type: none"> • Name • Contact information • Your communications preferences 	<p>Minimum of 1 year or until consent is withdrawn</p>	<p>Business administration and communications systems held on secure UK servers</p>
<p>Charitable organisations supported by Cohort plc or our Trading Subsidiaries</p>	<ul style="list-style-type: none"> • Name • Contact information • Financial information • Information and documents relating to the support we are providing, including communications with you 	<p>6 years</p>	<p>Business administration and communications systems held on secure UK servers</p>
<p>Website visitor</p>	<ul style="list-style-type: none"> • Technical data • Usage data 	<p>30 days</p>	<p>Google Analytics</p>
<p>Job Applicants</p>	<p>Please refer to our CANDIDATE PRIVACY POLICY LINK</p>		
<p>Our Current and Former Staff</p>	<p>Please refer to our Staff Privacy Policy in the Cohort plc Staff Handbook or contact dpl@cohortplc.com</p>		

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Who has access to your information?

We do not sell or rent your personal data or information to any third party or share your information with third parties for their marketing purposes.

We will disclose your data or information if required by law, for example by a court order or for the prevention of fraud or other crime.

We may pass your information to our Trading Subsidiaries for the purposes of providing you with relevant information about their products and services, or to enable discussions about co-operative working for mutual benefit.

We may pass your information on to our third party service providers, professional advisors, agents or subcontractors for the purposes of completing a task or providing services to you on our behalf. Additionally to HM Revenue & Customs, regulators and other authorities acting as processors based in the United Kingdom who require reporting of processing activities in certain circumstances.

We disclose only the personal information necessary to deliver that service and have a contract in place that requires them to keep your information secure and not to use it for their own marketing purposes. When you are giving your personal data or information to the relevant third party this will be made very clear. They may then be acting as the data processor of your information for this purpose and therefore we advise you to read their Privacy Policy which will be clearly displayed at the point of data collection.

Third party service providers who act as data processor on our behalf

DotMailer	Media Alert email fulfilment	Name / Email Address	LINK & LINK2 to Privacy Policies
Investis	RNS Service provider	Name / Email Address	LINK to Privacy Policy
Google ReCaptcha	Robot checking tool on sign up form	IP Address	LINK to Privacy Policy
Google Analytics	Web Analytics	IP Address	LINK to Privacy Policy
Link Asset Services	Shareholder services	Identity, Contact, Financial & Transactional data	LINK to Privacy Policy
Investec	Nominated Advisor – Shareholder services	Identity, Contact & Transactional data	LINK to Privacy Policy

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Transfers outside of the European Economic Area

Your personal data or information in the European Economic Area (EEA) is protected by data protection laws, but other countries do not necessarily protect your personal information in the same way. The EEA covers all countries in the EU plus Norway, Liechtenstein and Iceland. Some of the third party providers we use to help us manage our business and services may involve data transferring to the United States or other countries outside of the EEA.

We use the following third party online tools which may involve your data being processed outside of the EEA:

Google Analytics	Web Analytics	IP Address	LINK to Privacy Policy
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Your choices & rights

You have a choice about whether or not you receive marketing communications about the innovative products and services available from across our Group. We will not contact you for direct marketing purposes by post, email, phone or text message if you indicate to us that you wish to opt out of receiving such communications.

As an individual whose personal data is processed by Cohort plc you have these rights

- The right to be informed, which is what this privacy policy is for
- The right to access the data we hold about you
- The right to object to direct marketing – either use the unsubscribe option or contact us directly
- The right to object to processing carried out on the basis of legitimate interests
- The right to erasure (in some circumstances)
- The right to data portability
- The right to have your data rectified if it is inaccurate
- The right to have your data restricted or blocked from processing

How you can update your information

The accuracy of your information is important to us. You can change your marketing preferences, unsubscribe or opt-out from receiving communications from us by contacting us at any time.

If you change your email address or if you want to update any of the information we hold on you, please email us dpl@Cohortplc.com or by post at Cohort plc, 2 Waterside Drive, Arlington Business Park, Theale, Reading, RG7 4SW. Alternatively, you can telephone us on +44 118 909 0390.

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How you can access your personal information

You have the right to ask for a copy of the personal information Cohort plc hold relating to you. To do this please contact dpl@Cohortplc.com or by post at Cohort plc, 2 Waterside Drive, Arlington Business Park, Theale, Reading, RG7 4SW. Alternatively, you can telephone us on +44 118 909 0390.

You also have the right to lodge a complaint about our processing of your personal data with the UK's Information Commissioner's Office <https://ico.org.uk/>.

Keeping your data secure

When you give us personal information we take steps to ensure that it's treated securely and strive to protect it on our internal systems and our secure server systems encrypt your information.

Contacting us via social media

We do not currently use Social Media as a communication platform.

Contacting us via email

We use Transport Layer Security (TLS) to encrypt and protect email traffic in line with government. If your email service does not support TLS, you should be aware that any emails we send or receive may not be protected in transit.

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

Links to other websites

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

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COOKIE POLICY

Use of cookies by this website

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site about aspects of your visit. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the website may become inaccessible or not function properly.

Third-party cookies

On some pages of our website, other organisations may also set their own anonymous cookies. They do this to track the success of their application, or to customise the application for you. Because of how cookies work, our website cannot access these cookies, nor can the other organisations access the data in cookies we use on our website. For example, when you submit data through a website form.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org.

To opt-out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>

The table below details every cookie used by this website.

Cookie	Name	Purpose	More information
Google Analytics	_utma _utmb _utmc _utmt _utmv _utmz	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.	Click here for an overview of privacy at Google
Investis	MyInvestisCookie	Stores encrypted tokens passed through MyInvestis	End of browser session

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	myinvestisdata	store user data when login using myinvestis	End of browser session
	sc_fv	Flash Version	End of browser session
	#sitename#lang	Stores Language For the Website	End of browser session
	ASP.NET_SessionId	SessionId what .NET Manages for maintaining session	End of browser session
	.ASPXAUTH	Auth Id, which .NET assigns as a unique ID to authenticate user on each request	End of browser session
	itmeid_cookie	Cookie from Mynotes	Persistent until it is deleted
	cookieCollection	Cookie from Mynotes	Persistent until it is deleted
	myNotesCounter	Cookie from Mynotes – 1 Note is added	Persistent until it is deleted
	pdfPages	Cookie from PDF Basket – 2 Items added Separated by .	Persistent until it is deleted
	PreviewPages	Cookie from PDF Basket	Persistent until it is deleted
	selectedTab	Cookie from Mynotes	Persistent until it is deleted
	_cookieConsent	Cookie Consent Disclaimer text	1 year
	_ga, _gat, _gat_newTracker	Tracking ID for the analytics	2 years
	has_js	to check if js is enabled or not	End of browser session
	.ASPXFORMSAUTH	This attribute is used to specify the HTTP cookie to use for authentication.	End of browser session
	.ASPXROLES	Cookies used to keep track of if the visitor has any permissions on the website. Only used for logged in users	End of browser session
	ASP.NET_SessionId	SessionId what .NET Manages for maintaining session	End of browser session

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