

IRIS INTELLIGENT RECEIPTS PRIVACY POLICY

1.0 OUR CORE BELIEFS REGARDING USER PRIVACY AND DATA PROTECTION

- User privacy and data protection are human rights
- We have a duty of care to the people within our data
- Data is a liability, it should only be collected and processed when absolutely necessary
- We loathe spam as much as you do!
- We will never sell, rent or otherwise distribute or make public your personal information

2.0 RELEVANT LEGISLATION

Along with our business and internal computer systems, this website or mobile application is designed to comply with the following national and international legislation with regards to data protection and user privacy:

- [UK Data Protection Act 1988 \(DPA\)](#)
- [EU Data Protection Directive 1995 \(DPD\)](#)
- [EU General Data Protection Regulation 2018 \(GDPR\)](#)
- [Australian Privacy Act 1988 \(APA\)](#)

This site's compliance with the above legislation, all of which are stringent in nature, means that this site is likely compliant with the data protection and user privacy legislation set out by many other countries and territories as well. If you are unsure about whether this site is compliant with your own country of residences' specific data protection and user privacy legislation you should contact our data protection officer (details of whom can be found in [section 9.0](#)) for clarification.

3.0 PERSONAL INFORMATION THAT THIS WEBSITE OR MOBILE APP COLLECTS AND WHY WE COLLECT IT

This website or mobile App collects and uses personal information for the following reasons:

3.1 Site visitation tracking

Like most websites, this site uses Google Analytics (GA) to track user interaction. We use this data to determine the number of people using our site, to better understand how they find and use our web pages and to see their journey through the website.

Although GA records data such as your geographical location, device, internet browser and operating system, none of this information personally identifies you to us. GA also records your computer's IP address which could be used to personally identify you but Google do not grant us access to this. We consider Google to be a third party data processor (see [section 6.0](#) below).

GA makes use of cookies, details of which can be found on [Google's developer guides](#). FYI our website uses the analytics.js implementation of GA.

Disabling cookies on your internet browser will stop GA from tracking any part of your visit to pages within this website.

In addition to Google Analytics, this website or mobile App may collect* information (held in the public domain) attributed to the IP address of the computer or device that is being used to access it. The information is supplied to us from [Whoisvisiting.com](#). Whoisvisiting.com is a service offered by Whoisdata Limited. **The Whoisvisiting system**

does not use your IP address to identify you, the individual, in any way. No cookies are used by the Whoisvisiting system.

* The Whoisvisiting system will only lookup information when a static IP address is being used. [Differences between a static and dynamic IP address](#).

More information about [how Whoisvisiting uses IP addresses](#).

3.2 Contact forms and email links

Should you choose to contact us using the contact form on our website or mobile App or an email link like, none of the data that you supply will be stored by this website or mobile App or passed to / be processed by any of the third party data processors defined in [section 6.0](#). Instead the data will be collated into an email and sent to us over the [Simple Mail Transfer Protocol \(SMTP\)](#). Our SMTP servers are protected by [TLS](#) (sometimes known as SSL) meaning that the email content is encrypted using [SHA-2](#), 256-bit cryptography before being sent across the internet. The email content is then decrypted by our local computers and devices.

3.4 Email newsletter

If you choose to join our email newsletter, the email address that you submit to us will be forwarded to [MailChimp](#) who provide us with email marketing services. We consider MailChimp to be a third party data processor (see [section 6.0](#) below). The email address that you submit will not be stored within this website's own database or in any of our internal computer systems.

Your email address will remain within MailChimp's database for as long as we continue to use MailChimp's services for email marketing or until you specifically request removal from the list. You can do this by unsubscribing using the unsubscribe links contained in any email newsletters that we send you or by [requesting removal via email](#). When requesting removal via email, please send your email to us using the email account that is subscribed to the mailing list.

If you are under 16 years of age you **MUST** obtain parental consent before joining our email newsletter.

While your email address remains within the MailChimp database, you will receive periodic (approximately three times a year) newsletter-style emails from us.

4.0 HOW WE STORE YOUR PERSONAL INFORMATION

We only store your mobile number and/or email address as means of providing you with our IRIS Intelligent Receipts Service. You do not need to supply any additional personal information to use our service. You may opt-in to add other personal identifiable information within the Profile section of our mobile App so that we may provide you with a more personal service. This is completely optional. Any information you supply is stored in our database in an encrypted stage during transmission from your App and at rest on our database.

Pseudonymisation is a recent requirement of the GDPR which many web application developers are currently working to fully implement. We are committed to keeping it as a high priority and will implement this on our website and mobile App as soon as we are able to.

5.0 ABOUT THIS WEBSITE SERVER AND MOBILE APP DATABASE SERVER

This website is hosted by Amazon Web Services (AWS) within a UK data center. AWS implement a series of security measures to safeguard their infrastructure.

All traffic (transferal of files) between this website, your browser and mobile App is encrypted and delivered over [HTTPS](#) or similar encrypted protocol.

6.0 OUR THIRD PARTY DATA PROCESSORS

We use a number of third parties to process personal data on our behalf. These third parties have been carefully chosen and all of them comply with the legislation set out in [section 2.0](#). All 3 of these third parties are based in the USA and are [EU-U.S Privacy Shield](#) compliant.

- Google ([Privacy policy](#))
- Mailchimp ([Privacy policy](#))

7.0 DATA BREACHES

We will report any unlawful data breach of this website or mobile App's database or the database(s) of any of our third party data processors to any and all relevant persons and authorities within 72 hours of the breach if it is apparent that personal data stored in an identifiable manner has been stolen.

8.0 DATA CONTROLLER

The data controller of this website is: Cabora Technologies Limited, a UK Private limited Company with company number: **10975467**

Whose registered office is:
215A Business First, Davyfield Road, Blackburn, United Kingdom, BB1 2QY

9.0 DATA PROTECTION OFFICER

All data related enquiries should be addressed to the Data Protection Officer at the operating office listed in section 8.0

Email: info@cabora.co.uk with the subject line **Data Protection Enquiry**

10.0 CHANGES TO OUR PRIVACY POLICY

This privacy policy may change from time to time in-line with legislation or industry developments. We will not explicitly inform our clients or website users of these changes. Instead, we recommend that you check this page occasionally for any policy changes. Specific policy changes and updates are mentioned in the change log below.

10.1 Change log

17/03/2019

- Privacy policy initiated

17/07/2019

- Privacy policy title updated