

Tenerity Limited Privacy and Cookies Policy

www.privacyguard.co.uk

Last Updated: 24 August 2022

Tenerity Limited ("Tenerity", "we", "us", "our") respects your privacy and is committed to protecting your personal data. This Privacy and Cookies Policy ("Policy") will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tells you about your privacy rights and how the law protects you.

This Policy is provided in a layered format so you can click through to the specific areas set out below.

[1. About Tenerity and this Privacy and Cookies Policy](#)

[2. Data we collect](#)

[2.1 How we use your data](#)

[2.2 Other collection of personal data](#)

[2.3 Data where we need your consent](#)

[2.4 Your communication preferences](#)

[2.5 Processing for legitimate business purposes](#)

[3. Why we share your data](#)

[3.1 Sharing your data with partners and selected third parties](#)

[3.2 Sharing your data within the Tenerity Group](#)

[3.3 Sharing your data with others](#)

[3.4 Sharing your data for compliance](#)

[purposes](#)

[4. Your rights](#)

[4.1 Right to rectification](#)

[4.2 Right of access, restriction of processing and erasure](#)

[4.3 Right to object](#)

[5. Security](#)

[6. Other important information](#)

[6.1 Updates to this Policy](#)

[6.2 Transfers](#)

[6.3 Retention](#)

[6.4 Contact](#)

[7. Cookies Policy](#)

Privacy Policy

1. About Tenergy and this Privacy

Tenergy creates compelling customer engagement solutions for clients and manages end-to-end engagement and membership programs available to you.

Tenergy is committed to protecting and respecting your privacy. We want you to know how and why we use any personal data we collect from you, you provide us, we hold about you, or we otherwise process. This Privacy and Cookies Policy also explains the choices available to you about your data. In providing your data to us or using our services or our websites you agree to this Policy and accept the practices outlined in this Policy.

When we use the term “Personal data” and “your data” we mean any information about you which is personally identifiable or can be related back to you such as your name, date of birth, credit or debit card numbers, address, telephone number, email address, marketing preferences, service selections and queries. It does not include aggregated or deidentified information that is maintained in a form that cannot be related back to you.

This Policy covers the provision of all our corporate website that links to privacy, cookies, our consumer services and our interactions with you. These include any services you enrol in or otherwise subscribe to.

This Policy does not cover offerings we provide solely on behalf of our clients, nor personal information and privacy practices relating to job applicants, employees and other Tenergy personnel to which please refer to our Recruitment Privacy Policy.

For offerings provided on behalf of our clients, please refer to the privacy notice of the client with which you have a relationship for information on how they engage service providers, like us, to process personal information on their behalf.

Please refer to your terms and conditions to understand whether we are the Data Controller or Data Processor of your data.

If you have a concern about your data or a question about this Policy for our Data Protection Officer, please contact them by email at dpo@tenergy.com.

2. Data we collect

Tenergy collects and uses your data for the purpose of providing you with the service you sign up for whilst ensuring you have a great and enjoyable experience.

In addition to the personal data we collect automatically, we also collect personal data directly from you through our websites and online services:

- **Newsletters and Email Communication:** Many of our websites and online services provide you with an opportunity to sign up to our newsletters and email communications by giving your email address. We use your email address to communicate with you about our services and exciting developments at Tenergy, which may include marketing communications. Please see the Your Communication Preferences section below for additional information about opting out of our marketing communications.
- **Contact Us:** Our websites and online services enable individuals and representatives of prospective business clients and partners to connect with us either through an online web form or via a telephone call with our customer services, which collect contact information (such as first and last name, email address, phone number, company name, and title with company), area(s) of interest or concern, and a custom message tailored to your needs. We use this information to communicate with you in connection with your request, including corresponding with you about Tenergy’s services, offerings, customer service, business partnership opportunities or media inquiries.

It is up to you what data you disclose and we collect and you may decline to provide us with your data. However, if you choose not to provide us with your data necessary to deliver the product/service, you will not be able to use such product/service.

Although, we often collect the personal data described above directly from you, we may also collect certain information through our business partners when you enrol through a partner that you would already have a relationship with. In addition, we may also collect this information through our service providers and other third parties which collect such information on our behalf, such as communications providers, payment processors, payment system providers, and information technology providers.

Note about Biometric Information: Some of our mobile applications require you to log in to access your account. We may provide you with the ability to log in using facial, fingerprint or other biometric recognition technology available through your mobile device. If you choose to utilise these login features, information about your facial geometry, your fingerprint or other biometric information will be collected by your mobile device for authentication purposes. We do not store or have access to this biometric information. Instead, your mobile device will perform the biometric

authentication process and only let us know whether such authentication had been successful. If the authentication had been successful, you will be able to access the applicable mobile application without separately providing your account credentials.

Please note our systems may record personal data you type into our websites and other online services even if you do not choose to submit it.

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (“Legitimate Business Purpose”)
- Where we need to comply with a legal or regulatory obligation and
- Where you have provided your consent.

2.1 How we use your data

The data we collect will depend on:

- the type of product/service you sign up to
- the features you use
- your interactions with us
- whether you are paying us for the service or receiving the service through a package offered by one of our partners and
- the preferences you select.

The data we collect for the provision of products/services may include the following:

- **Name and contact data** necessary to authenticate your identity, register you to receive the relevant services including, where applicable, co-ordinating with other partners or relevant third parties to provide such services and the day to day servicing of your membership. Without it, we will not be able to sign you up and/or provide you access to use such product or service. In addition, this data is necessary to detect and if necessary withhold you from re-enrolling in a product/service where your membership/policy was terminated due to a breach of terms of use such as misuse of the product/service or fraudulent, unlawful or criminal activity. The specific legal ground we are processing your personal data on is under performance of a contract with you.
 - The type of data we would collect includes first name and last name, postal address, email address, telephone/mobile number, date of birth and other similar contact data.
 - Partners and relevant third parties include credit reference agencies, financial institutions such as your bank, travel related organisations such as airlines, hotels, cruise organisers, providers of airport parking/lounge services and the partner you used to sign up to the product/service.
 - Day to day servicing of your membership includes communications about order confirmations, benefit reminders associated with your product/service, renewal notice/expiry notice, payment issues and maintenance issues.
- **Payment data** necessary to process your payment for the product/service you have signed up for. Without it, we will not be able to enrol you and/or provide you access to use the product or service (unless you are receiving the service through a package offered by one of our partners). In addition, this data is necessary to detect and if necessary withhold you from re-enrolling in a product/service where your membership/policy was terminated due to a breach of terms of use such as misuse of the product/service or fraudulent, unlawful or criminal activity. The specific legal ground we are processing your personal data on is under performance of a contract with you.
 - This may include credit or debit card numbers, expiry date and the associated security code. We will not store your associated security code (CVV) so you will need to re-enter this for any future transactions.
- **Feedback data** where we will process your data for certain [legitimate business purposes](#) we do so to improve our products and services, for your continued enjoyment and to assist in the development of new products and services based on your feedback.
 - This may be through comments and reviews you leave for the product/service, surveys, updates to your information such as the way you prefer to be contacted, or through the questions and information you provide to our customer service desk whether through phone or email.
 - We may also use your data to conduct market research by asking you to participate in a survey about topical issues, conducted by us, our partners or third parties. If you receive a survey from us, we will always tell you how any information you provide in the survey will be used. If you receive a survey from our partner or selected third party, please read their privacy notice/policy before submitting any of your data.
 - Participation in surveys is voluntary and it is up to you whether to participate.
- **Demographic data** necessary to ensure you are old enough to use the product/service and in a country where we offer the product/service. Without it, we will not be able to sign you up and/or provide you access to use such product or service. There may be instances where demographic data is optional and this will be made clear to you if we ask for this data. If it is optional, and you have provided us with such data, we will process it in order to provide you with information about your product/service such as price changes due to your age or location or to send you notifications if you are using the product/service whilst in a different country. This may include your age, country or gender.
- **Data about Children** only when it is necessary for the product/service and you have provided it to us. This data will not be used for any other purpose other than to provide you the full benefit of the product/service such as the protection of your child’s bank card, cover for your child under insurance products or for travel services such as flights, hotels or cruises.

Our products are services and not available to be taken out by persons under the age of 18. The specific legal ground we are processing your personal data on is under performance of a contract with you.

- [Call recording data](#) where we may collect your data if we record or monitor calls by you to our customer service desks. We will process your data for [legitimate business purposes](#) namely quality assurance and training purposes and to ensure we have collected and recorded any consent you provide over the phone. We will always inform you if such recording or monitoring is taking place.
- [Anonymised data and Aggregated data](#) – anonymisation is the process of converting personal data to anonymised data so that it does not identify you or any individual and will not allow you or any individual to be identified through its combination with other data. We collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but it is not considered personal data in law as this data does not directly or indirectly reveal your identity. In addition to the way we process your data explained above, we will use anonymised data and aggregated data to improve the quality of our existing products/services, develop new features, products/services and for overall research purposes. An example would be where we aggregate your data on how often you use the product/service to calculate the percentage of users accessing a specific website feature. As this data is anonymised and does not identify you, we may share this data with Tenergy controlled affiliates, subsidiaries and our parent company as well as third parties and business partners. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We will also use your data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you. You will receive marketing communications from us about similar products and services if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing by clicking the unsubscribe link in the email or SMS.

2.2 [Other collection of Personal Data](#)

In addition to the personal data collected above, we may also collect your personal data as follows:

- **Referrals:** We offer a referral service that allows you to tell one of your friends about our services by forwarding certain marketing communications and/or emails to an individual you believe may be interested in our products and services. We use personal data collected in connection with these referral services to communicate with the individual you are referring and to provide you any benefits, incentives and/or rewards you may be eligible for as a result of your referral.
- **Social Media:** If you choose to interact with us on social media, we may collect personal information about you from your social media account that you make public. We use personal information collected in connection with your social media account to communicate with you, better understand your interests and preferences, and better understand our customer base in the aggregate.
- **Business Partners:** Our business partners, such as our travel providers and product merchants, collect personal information in connection with our services and often share some or all of this information with us. For example, we receive information about transactions you complete on our business partners' websites through our services to count those transactions toward your cash back, bonus points or other rewards programs.
- **Service Providers:** Our service providers, such as payment processors and marketing providers, collect personal information and often share some or all of this information with us. For example, we receive personal information from payment processors to confirm your payment for the services was accepted.
- **Information Providers:** We may from time to time obtain information from third-party information providers to correct or supplement personal information we collect. For example, we may obtain updated contact information from third-party information providers to reconnect with you.
- **Inquiry Information:** If you choose to contact us, we will collect personal information in connection with your inquiry and correspondence with us. We may need additional information to fulfil your request or respond to your inquiry. We may provide additional privacy disclosures where the scope of the inquiry/request and/or personal information we require fall outside the scope of this Policy. In that case, the additional privacy disclosures will govern how we may process the information you provide at that time.
- **Publicly Available Information:** We may collect personal data from publicly available sources, such as government records or public review websites, to supplement the personal data identified, above.

2.3 [Data where we need your consent](#)

We will ask you for your express opt-in consent before we share your personal data with any company outside Tenergy controlled affiliates, subsidiaries and our parent company for marketing purposes. We will provide you with more information about the categories of these companies at the time of asking you for your express opt-in consent. This will typically be for products/services offered by other companies which may be of interest to you based on the product/service you have with us or may be for another purpose which will also be made clear to you at the time of obtaining your express opt-in consent.

We will also ask you for your express opt-in consent before we send you marketing communications about our products/services that are dis-similar to what you currently have with us.

2.4 [Your communication preferences](#)

If you provide your explicit opt-in consent to receive such marketing communications, we may provide you with further options where you can choose how to receive it, such as email messages, direct mail offers, SMS, physical mail or push notifications or other communications, including telephone calls, regarding our services.

You may ask us not to send you marketing communications or request a change to the method or frequency of

communication by:

- Following any available opt-out or communication preferences instructions in the marketing communications.
- When available, accessing the “Unsubscribe” or “Communication Preferences” settings in your account profile page.
- Sending a request to [here](#) with the words “Opt Out” or “Communication Preferences” in the subject line, the address or number at which we contacted you and your request. You can edit your preferences on how you receive them, how often you receive them or even stop receiving them altogether.

Please allow up to 10 days for your request to be processed. If you request to opt out of marketing communications, please note that we may continue to send you non-marketing communications, such as those directly related to the fulfilment of a specific transaction you requested, maintenance of your account or status of our ongoing business relations

2.5 Processing for Legitimate Business Purposes

We explain throughout this Policy when and why we process your data for a legitimate business purpose. A legitimate business purposes means the interests of Tenergy in conducting and managing our business to enable us to give you the best products and services and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You have the right to object to this processing if you wish and if you wish to do so please contact our [Data Protection Officer](#). If you do object, this may affect our ability to carry out the tasks for your benefit where we are processing your data for a legitimate business purpose.

3. Why we share your data

We may share your data if it is necessary to do so in order to provide you with your product/service, if we have a [legitimate business purpose](#) for doing so, or if you have given us your explicit consent to do this.

Please note that when you are redirected to a business partner or third party website from our website, if you provide personal data to any of those partners or third parties, your data will be governed by their privacy statement/policy and not ours. You should read their privacy statement/policy before you submit any of your data to their websites.

3.1 Sharing your data with partners and selected third parties

The entities we will share your data with include selected third parties. We engage with:

- Affiliate networks and merchants to fulfil your orders and connect your purchases to your rewards accounts referred from our services to the affiliates networks and merchants
- Payment processors, online payment systems providers and other billing agents to process your payment, refunds, cashback and rebates
- Transaction fulfilment and delivery providers to fulfil your transactions through our services and deliver the products and experiences that you order through our services
- Insurance, financial institutions and other third parties to administer and service your coverage with guarantees, protection plans and extended warranties made available through our services
- Credit and identity benefit providers to facilitate credit monitoring and protection (including fraud prevention) and compile relevant reports
- Marketing partners, including advertisement networks, social networks, re-targeting partners and marketing communication providers, to communicate with you about our products and services and market such to you
- Customer service and communication providers, including third parties which provide call centre, email and chat support services to facilitate your customer services experiences and our communications with you
- Travel related organisations to fulfil airline, hotel, cruise and providers of airport parking/lounge services and
- Information security services providers, which will have access to your data for the purposes of monitoring our networks and websites to help keep your data secure.

Such processing is undertaken for legitimate business purposes.

3.2 Sharing your data within the Tenergy Group

We may share your data among Tenergy controlled affiliates, subsidiaries and our parent company throughout the world which are acting as our data processor and only process your data in accordance with our instructions for [legitimate business purposes](#).

We may participate in a corporate business transaction, such as a merger, acquisition, joint venture, or financing or sale of company assets. We may disclose personal data to a third party during negotiation of, in connection with or as an asset in such a corporate business transaction. Personal data may also be disclosed in the event of insolvency, bankruptcy, or receivership.

If you would like to see an up to date list of these companies, please click [here](#). We will do this in order to process transactions and ensure you are able to use the product/service.

Your data is still protected in the same manner as set out in this Policy in line with applicable laws. Click [here](#) to understand our position on the transfer of data outside of the European Economic Area.

3.3 Sharing your data with others

We may also share aggregated demographic information with third parties interested in advertising on our online services to assist them in understanding the audience they would be reaching, but this information would be in an anonymous form, not designed to be identifiable to a specific individual. and will not contain nor be linked to any personally identifiable information about you or any other person.

We may ask your card issuer to update us with any changes to the information, including updated or new card numbers or expiry dates, it has provided us.. This is necessary to ensure a smooth transition for your continued enjoyment of the product/service, including where you receive cyber security and fraud detection services.

3.4 Sharing your data for compliance purposes

Additionally we reserve the right to access and disclose your information:

- to establish, exercise, or defend any legal claims
- to comply with applicable laws and regulations
- to respond and comply with lawful requests from governments, law enforcement agencies or parties whose request we reasonably consider to be justified in connection with any allegations by any party about your abuse of our services
- to operate our systems effectively and to protect our rights and property and those rights and property of our agents, customers, and others, including to enforce our agreements, policies, and terms of use
- to detect, suppress, or prevent fraud
- to reduce credit risk and collect debts owed to us
- to protect the health and safety of us, our customers, or any person and
- as otherwise required by applicable law.

4. Your Rights

4.1 Right to rectification

You can update and amend your data held by us if inaccurate or incomplete by emailing us at customer.relations@tenerity.com or [writing to](#) Tenerity Privacy Policy, Sentinel House, Airspeed Road, Portsmouth, Hampshire, PO3 5RF, calling 0800 0859 377 or by visiting your profile page if you have an online account with the product/service.

4.2 Right of access, restriction of processing and erasure

If you would like to see the data we process on you, restrict the processing of your data or have it deleted you can contact our [Data Protection Officer](#) who will investigate the matter and take you through the necessary steps to provide you with the data you requested or to delete it. If you would like it deleted, in particular any data which is necessary for us to process to provide you with the product/service, you will no longer be able to use the product/service. If applicable, our [Data Protection Officer](#) will explain any circumstances where we are not be able to erase your data such as the exercise or defence of a legal claim and situations where you can restrict the processing of your data. Our [Data Protection Officer](#) will respond to your query within thirty (30) days of receiving your request.

4.3 Right to object

You can edit or remove your information from our marketing database by emailing, writing or calling us using the contact details above, specifying your name, the email or other address/ telephone number you used to register with us and, if referring to a web registration, your user name in the email. You may also do this online if you have an online account by visiting your preferences page.

In addition, if you have provided us with your explicit consent to receive marketing communications via email, you will normally find an unsubscribe link at the bottom of the marketing emails you receive, which you can use to tell us if you no longer wish to receive marketing communications from that source.

If you object to us processing your data based on a [legitimate business purpose](#), please contact our [Data Protection Officer](#) who will investigate and take action on the matter.

5. Security

Securing your personal and non-personal information is very important to us. All customer databases are held in a secure environment and (except for law enforcement authorities in limited circumstances), only those Tenerity employees or other persons who need access to your data in order to perform their duties are allowed such access. Any of these employees or persons who violate our privacy and/or security policies may be subject to disciplinary action, including possible termination and civil and/or criminal prosecution.

Where you are using our websites, we take proactive steps to put safeguards in place to provide for the secure transmission of your data from your computer to our servers. However, due to the inherent open nature of the Internet, we cannot guarantee that communications between you and Tenerity, and Tenerity and you, will be free from unauthorised access by third parties, such as hackers. We have implemented all necessary and reasonable technical and organisational measures to protect your data including:

- data minimisation and encryption of personal data

- the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services
- the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident and
- a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

Our websites utilise Standard SSL encryption on pages where secure information is transmitted over the Internet. We also use Verisign as our Certificate of Authority. If you would like more information on our Verisign Certificate, please visit <https://www.verisign.com/?dmn=verisign.co.uk>

6. Other important information

6.1 Updates to this Policy

We may update this Policy when necessary to reflect changes in our products/services. Please check the last updated date at the top of this Policy to ensure you are reviewing our most current version and understand how we protect your data. If there are any material changes to this Policy which change the way we collect and use your personal data, we will let you know by either posting on this website a notice of the changes we are making before they take effect or by sending you a notification.

6.2 Transfers

As part of the services offered to you, for example through our website, the information you provide to us will be transferred to and processed in countries outside of the UK, in particular to the European Economic Area (EEA) and the US for the purposes of payment processing, ad hoc application maintenance and systems support. If we transfer or store your personal data outside the UK in this way, we will take steps with the aim of ensuring that your privacy rights continue to be protected, as outlined in this privacy policy and in accordance with the Data Protection Act 2018 and UK General Data Protection Regulation. If you use our service while you are outside the UK, your personal data may be transferred outside the UK in order to provide you with these services. Where you have used our services to make travel arrangements such as booking flights, hotels or cruises, your data will be transferred to the third party in the country where you have made the arrangements.

Whenever we process or transfer your personal data out of the UK, we always ensure that an adequate level of protection is afforded to it. This is the case, for example, when we process or transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK (to see the list, please visit the [ICO here](#)). Whenever our affiliates or providers based in the EEA or US process your data, we include relevant mechanisms (such as standard contractual clauses approved by the UK or another relevant regulator) in contracts and agreements with them.

If you would like more information on our parent company's privacy policy please visit www.tenerity.com or contact our [Data Protection Officer](#). When providers or affiliates based in other countries that have not been deemed to provide an adequate level of protection for personal data by the UK process your data, we use Data Transfer Agreement ("IDTA"), and International Data Transfer Addendum (the "UK Addendum") in contracts and agreements with them to maintain a similar level of protection as if your data was processed within the UK.

You can contact our Data Protection Officer if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

6.3 Retention

We retain your data for as long as is reasonably necessary to fulfil the purpose for which it was collected as explained in [Section 2](#) above.

We may retain personal data for longer periods of time, until set retention periods and deadlines expire, for instance where we are required to do so to resolve disputes and defend claims, as well as, for any additional purpose based on the choices you have made such as to receive marketing communications that you provided your consent to. In particular, we will retain call recordings, the data you supplied when joining the product, including complaints, claims (for insurance products) and any other data you supplied during the duration of your contract with us for your product/service for a period of seven (7) years from termination or expiry of your service in line with industry standards and UK statutory limitation periods for the defence of contractual claims.

Once retention of the personal data is no longer necessary for the purposes outlined above, we will either delete or anonymise it or, if this is not possible (for example, because your personal data has been stored in backup archives), then we will securely store your personal data and isolate it from any further processing until deletion or anonymisation is possible.

6.4 Contact

If you have a concern about your data or a question about this Policy for our Data Protection Officer, please contact them by email at dpo@tenerity.com. If you are not happy with the response you received or believe your data has not been used in accordance with this policy and therefore not processed in line with applicable laws, you may lodge a complaint with the Information Commissioner's Office (ICO), the UK Supervisory authority. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

7. Cookies Policy

This Cookies Policy contains all the information about cookies and similar technologies that Tenerity uses on its website.

What are cookies and similar technologies?

Cookies (and similar technologies) are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website during your browsing session or on each subsequent visit, or to another site that recognises that cookie.

Why do we use them?

We use these technologies in order to collect information (personal and anonymous); provide the service; improve the service (by gathering statistical information on traffic, our audience and use of our website); show content and adapted advertising to users and customer; distinguish you from other users of the website; and allow you to share our content on social networks.

We use both first party cookies (Tenerity cookies) and third party cookies, which are cookies provided by other people's websites. For example, a third party content provider might provide a cookie when you access content hosted on their website. We do not have access to those third party cookies and their providers will have their own cookie and privacy policies, which we encourage you to read.

More details on how businesses use cookies is available here: <http://www.allaboutcookies.org/>

In the following sections, Tenerity will explain to you which cookies (and other similar technologies) are used on the website (and for what purpose). You can give consent to cookies, or withdraw any consent you have previously given, through our cookies tool or your browser settings - for more detail, please see "How to modify or uninstall cookies or similar technologies" below. Please note that, in order to refuse cookies that are set by third parties, you must use your browser settings or visit the third party site and follow the instructions in their cookie notice.

What Cookies does Tenerity use?

Tenerity uses the following types of cookies (and similar technologies):

Strictly necessary. These cookies are necessary for the website to function and cannot be switched off on our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. Without these cookies, the website, or some of its functionalities, would not work for you.

Personalisation & Analytics. These cookies enable the website to provide personalisation and enhanced functionality based on your browsing history. They may be set by us or by third party providers whose services we have added to our pages. If you do not authorise these cookies, we would be unable to provide you a personalised experience with content suitable to your needs. Please always remember to save your preferences so the selected cookies are installed.

A. COOKIES

You can access the details of cookies used on the website in the Consent Management Platform (CMP) the first time you access the website, or in the "Cookie Settings" section in the footer of the website which can be accessed at any time.

We use strictly necessary cookies – these cookies are essential, as they enable you to move around our website and use its features. Without these cookies, services you've asked for (such as completing an application form or logging into a secure area of our website) can't be provided.

In particular, we use session and persistent cookies on this site. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies and reject persistent and session cookies by following the directions provided in your Internet browser's "help" file or by visiting www.allaboutcookies.org. If you reject persistent or session cookies, you may still use our site, but you may not be able to access all the site's functionality or your access may be limited.

We are continually looking to adopt and implement new practices and technologies in order that we may improve your user experience. We may update this Cookies Policy from time to time with details of new cookies.

Details of the cookies we currently use on this website are shown below:

- i. Third-party cookies that do not require express consent by the user.

Name	Duration	Description	More information
ASP.NET_SessionId	Session	Net_SessionId is a cookie which is used to identify the users session on the server. The session being an area on the server which can be used to store data in between http requests. For example, the controller action may perform: Session["FirstName"] = model.	Microsoft Company 1 Microsoft Way, Redmond, WA 98052 www.microsoft.com
hasCookies	Session	A flag which indicates whether or not a cookie enabled on website.	Microsoft Company 1 Microsoft Way, Redmond, WA 98052 www.microsoft.com
Visitor	1 year	This is a custom cookie which stores the visitor details	Microsoft Company 1 Microsoft Way, Redmond, WA 98052 www.microsoft.com
Sis	3 months	A unique reference assigned to each visitor to help improve their experience using our website.	Microsoft Company 1 Microsoft Way, Redmond, WA 98052 www.microsoft.com
OptanonConsent	1 year	A first party default cookie, stored in web browser with a specific true or false value indicating whether or not a visitor should be shown a banner A custom server-side code default setting to assist us to make enhancement.	OneTrust Company www.onetrust.com Atlanta (Co-Headquarters),1200 Abernathy Rd NE, Bldg 600,Atlanta, Georgia 30328,+1(844)847-7154
optimizelyEndUserId	6 Months	Enables us to uniquely identify visitors, track their actions, and deliver consistent experiences across page loads via persistent visitor-level cookies and local storage.	OneTrust Company Atlanta (Co-Headquarters),1200 Abernathy Rd NE, Bldg 600,Atlanta, Georgia 30328,+1(844)847-7154 www.onetrust.com

B. SIMILAR TECHNOLOGIES

In addition to cookies, we use other technologies, which due to their characteristics and ability to collect data, must be included in this policy.

ii. Log files

A "log file" is a file on the server that stores information about the origin of website traffic, the way users navigate through the site and what visitors to our pages are looking for.

Among the information that we can collect with them are:

- in fixed terminals or laptops and similar: the IP address, the URL of the page prior to registration in the program, the browser and the version used, the date and time of the display of the advertisements of our program on third party pages and
- on mobile and similar terminals: the name of the device used, the size of the screen used (pixels), the orientation of the device (vertical / horizontal), the language of the device, the identification number of the device and the version of the operating system used.

In all cases, the information will be used to provide you with the appropriate service for the device you use and all data will be stored for security reasons in an encrypted manner for a maximum of third (30) days.

iii. Social media plug-ins

On our website you can find shortcuts to our social media profiles, through them you can interact with the content we host on the different platforms and social networks (Facebook, YouTube, Twitter, LinkedIn, etc.). Please review the terms of use and privacy policy of each platform for detailed information.

iv. Automatic data for browsing the website

When you browse the Internet, you leave a track of electronic information on each of the websites you have visited, it is the so-called "fingerprint", which can be tracked and stored by the servers of our websites. The navigation course data indicates the type of terminal

and the navigation software that was used or the Internet address of the website from which you logged into our website.

We will use this data in aggregate and anonymously to compile statistical data on the time that users spend on our website or to understand how they navigate through the website which will help us improve the program and the user experience.

- v. . Event tracking in emails

As a subscriber to our newsletter or marketing emails, we will send you emails, in which we have included certain tracking technologies that includes, amongst other things, may collect your personal data, such as your name and your IP.

The main objective of the same is to provide you with the service correctly (necessary), however, we can also use it for purely statistical purposes anonymously that allow us to improve our advertising campaigns, as well as solve any type of incident and confirm the receipt or sending of the same.

C. HOW TO MODIFY OR UNINSTALL COOKIES OR SIMILAR TECHNOLOGIES

You may refuse to accept, or withdraw your previous consent to the cookies installed on your computer or device in two ways:

- i. you can do so through the Cookies Settings link (which can be found in the footer of all our web pages,) Essential cookies cannot be disabled through the Cookies Settings link because they are necessary to make the website function. You may change your mind about the cookies you have selected through our Cookies Preference link at any time. Please be aware that the Cookies Settings link cannot be used to block cookies on third party websites linked to or from our website. In order to remove these cookies you will need to visit the relevant third party site and follow the instructions in their cookie notices. Alternatively, follow the instructions below to turn off these cookies using your browser settings.
- ii. Your browser settings may allow you to refuse the setting of certain cookies. The “Help” or “Internet Settings” functions within your browser should tell you how. For information on how to manage cookies on popular browsers please see the following links:
 - [Google Chrome](#)
 - [Microsoft Edge](#)
 - [Mozilla Firefox](#)
 - [Microsoft Internet Explorer](#)
 - [Opera](#)
 - [Apple Safari](#)

With regard to third-party cookies and similar technologies, we want to make sure that you understand that once you have allowed their use and installation on your computer, if you later decide to block them, this means that we will no longer receive data that could be collected by these cookies.

This does not mean that these cookies are permanently uninstalled from your terminal, for this it will be necessary that you go to the browser settings that you used to access the Program and follow the instructions to that effect.

Finally, if you do not want any tracking technology to be installed on your terminal, you can use the "do not track" tools, which will allow you to enable a "do not track" function or send you notices when certain types of cookies that you have predefined as "unwanted" are identified. These tools work in a similar way to so-called "incognito browsing". However, we remind you that part of the provision of this service requires that your purchases be tracked in order to offer you confirmation of purchases and associated refunds. In the event that you browse incognito or use any of these tools, we may not be able to track your purchases and we may not be able to provide the service correctly.

Remember, you can always contact us, both at the contact address and via email to our data protection officer at dpo@tenerity.com to receive additional information and to expressly request the deletion of any personal data that is collected through the use of these technologies.

Please remember that uninstalling or modifying the cookies that have been classified as technical or necessary (and some performance cookies) may mean that we are not be able to ensure the correct provision of the service (for example, monitoring of your purchases to obtain refunds) or maintain the full functionality of the website adjusted to the preferences.

D. CHANGES TO THE COOKIES POLICY

Tenerity reserves the right to modify the Cookies Policy at any time by posting the amended terms on the website. All amended terms will automatically take effect immediately on posting, so please review it periodically on the website to inform yourself of any changes. If you do not accept the changes made, you should immediately stop using the website or amend your cookie settings, accordingly.

Due to the constant updates made to these technologies, Tenerity has the firm commitment to carry out a complete review of the technologies at least once a year to ensure we have the most up-to-date information.

It is possible that during these annual reviews, some of the technologies identified above may be modified or some new ones may be

added. In any case, we assure you that these technologies will not have a different purpose than those they replace and new technologies will never be added that do not fit into any of the categories mentioned above.