Introduction

This privacy policy will help you understand what information we collect and use at Atom, and the choices you have associated with that information.

In this privacy policy the following words have defined meanings:

Atom, **we**, **our**, **ours** or **us** refers to Atom Consulting Services Limited and its subsidiaries and affiliates (together, the **Atom Group**), which provide the Services to you.

Data Controller, **Data Processor** and **Personal Data** are defined in the applicable Data Protection Laws.

Data Protection Laws means any laws and regulations in the UK relating to privacy or the use or processing of data relating to natural persons, including: (a) EU Directives 95/46/EC and 2002/58/EC (as amended by 2009/136/EC) and any legislation implementing or made pursuant to such directives, including (in the UK) the Data Protection Act 2018 (the **DPA**) and the Privacy and Electronic Communications (EC Directive) Regulations 2003; and (b) EU Regulation 2016/679 (**GDPR**); and (c) any laws or regulations ratifying, implementing, adopting, supplementing or replacing GDPR or DPA and in each case as amended or replaced from time to time.

Services refers to the applications, services, and websites (marketing and product) provided by Atom. Atom may, from time to time, introduce new products and services.

You and **yours** refers to the legal entity reading this privacy policy and any legal entity receiving Services from Atom.

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1. Information We Collect and Receive

We collect several different types of information to provide Services, including:

Third Party Data: We may receive information about you from other sources, including publicly available databases or third parties from whom we have purchased data, and combine this data with information we already have about you. This helps us to update, expand and analyse our records, identify new prospects for marketing, and provide products and services that may be of interest to you. We will not obtain any information about you from a third party if we do not believe that the third party is acting lawfully.

Device Information: When you use our Services, we automatically collect information on the type of device you use, operating system version.

2. How We Use the Information We Collect and Receive

Atom may access and use the data we collect as necessary: (a) to provide and maintain the Services; (b) to address and respond to Service, security, and customer support issues; (c) to detect, prevent, or otherwise address fraud, security, unlawful, or technical issues; (d) as required by law; (e) to fulfil our contracts; (f) to improve and enhance the Services; (g) to provide analysis or valuable information back to our customers and users; and (h) to provide marketing material suitable to your expressed interests.

Some specific examples of how we use the information:

- Send you product updates, marketing communications, and service information
- Respond to your inquiries and support requests
- Conduct research and analysis
- Display content based upon your interests
- Analyse data, including through automated systems and machine learning to improve our Services and/or your experience
- Market services of our third-party business partners

Atom will retain your information for as long as is necessary to fulfil the purpose for which it was collected, to comply with our legal obligations, to resolve disputes, and enforce our agreements.

3. Analytics, Cookies and Other Web Site Technologies

Atom is continuously improving our websites and products by using various third-party web analytics tools, which help us understand how visitors use our websites, desktop tools, and mobile applications, what they like and dislike, and where they may have problems. We maintain ownership of this data and do not share this type of data about individual users with third parties.

Geolocation and Other Data:

We use information such as IP addresses to determine the general geographic locations areas of our visitors. The web beacons used in conjunction with these web analytics tools may gather data such as what browser or operating system a person uses, as well as, domain names, MIME types, and what content, products and Services are reviewed or downloaded when visiting or registering for Services at one of our websites or using one of our mobile applications.

Google Analytics:

We use Google Analytics as described in "How Google uses data when you use our partners' sites or apps." You can prevent your data from being used by Google Analytics on websites by installing the Google Analytics opt-out browser add-on here. We also employ IP address masking, a technique used to truncate IP addresses collected by Google Analytics and store them in an abbreviated form to prevent them from being traced back to individual users. Portions of our website may also use Google Analytics for Display Advertisers including DoubleClick or Dynamic Remarketing which provide interest-based ads

based on your visit to this or other websites. You can use [Ads Settings](#) to manage the Google ads you see and opt-out of interest-based ads. You can opt-out of use of this information as described below.

Tracking Technologies:

Atom and our partners use cookies and similar tracking technologies to track user traffic patterns and hold certain registration information. Tracking technologies also used are beacons, tags and scripts to collect and track information and to improve and analyse our Service. If you wish to not have the information these technologies collect used for the purpose of sending you targeted ads, you may [opt-out here](#), or if located in the European Union, [click here](#). The Help menu on the menu bar of most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie and how to disable cookies altogether. You can still review the website if you choose to set your browser to refuse all cookies; however, you must enable cookies to establish an account and to install the Services. To manage Flash cookies, please [click here](#).

Examples of Cookies We Use:

Cookie Type	Purpose	Description
Session Cookies	We use these cookies to operate our websites.	Some cookies are essential for the operation of Atom websites. If a user chooses to disable these cookies, the user will not be able to access all of the content and features.
Preference Cookies	We use these cookies to remember your preferences.	When you register at a Atom website, we use cookies to store unique, randomly assigned user IDs that we generate for administrative purposes. These cookies enable you to enter the Atom sites without having to log on each time.
Advertising Cookies	These cookies are used to serve you with advertisements that may be relevant to you and your interests.	We use cookies to make advertising more engaging to users, as well as to assist in reporting on marketing program performance and analytics
Security Cookies	These cookies are used for general security purposes and user authentication.	We use security cookies to authenticate users, prevent fraudulent use of login credentials, and protect user

data from access by
unauthorized parties.

Social Media: Our sites include social media features, such as LinkedIn, Google and Twitter "share" buttons. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. These services will also authenticate your identity and provide you the option to share certain personal information with us such as your name and email address to pre-populate our sign-up form or provide feedback. Your interactions with these features are governed by the privacy policy of the company providing them.

4. Information Sharing

Ensuring your privacy is important to us. We do not share your personal information with third parties except as described in this privacy policy. We may share your personal information with: (a) third party service providers; (b) business partners; (c) members of the Atom Group; and (d) as needed for legal purposes. Third-party service providers have access to personal information only to the extent required to perform their functions and wherever possible, they must process the personal information in accordance with this Privacy Policy and additional data protection and privacy terms in our contract with them (which are no less onerous than the terms of this privacy policy).

Examples of how we may share information with third-party service providers include:

- Providing ancillary services which you select
- Fulfilling orders and providing the Services
- Payment processing and fraud prevention
- Providing customer support
- Sending marketing communications
- Conducting research and analysis
- Providing cloud computing infrastructure

Examples of how we may disclose data for legal reasons include:

- As part of a merger, sale of company assets, financing or acquisition of all or a portion of our business by another company where customer information will be one of the transferred assets.
- As required by law, for example:
  - to protect our rights;
  - to protect your safety (or the safety of others);
  - to investigate fraud; or
  - to respond to a government request.

We may also disclose your personal information to any third party with your prior written consent.

5. Communications

Atom may need to communicate with you for a variety of different reasons, including:

- Responding to your questions and requests. If you contact us with a problem or question, we will use your information to respond.

- Sending you Service and administrative emails and messages. We may contact you to inform you about changes in our Services, our Service offerings, and important Service related notices, such as billing, security and fraud notices. These emails and messages are considered a necessary part of the Services, essential to enable Atom to fulfil its contractual and regulatory obligations.
- Sending emails about new products or other news about Atom that we think you'd like to hear about either from us or from our business partners. You can always opt out of these types of messages at any time by clicking the unsubscribe link at the bottom of each communication.
- Conducting surveys. We may use the information gathered in the surveys to enhance and personalize our products, services, and websites.
- Offering referral programs and incentives, which allow you to utilize email, text, or URL links that you can share with friends or colleagues.

6. Accessing Your Data

Where Atom is acting as a data controller, Atom will also, when you request, provide you with information about whether we hold, or process on behalf of a third party, any of your personal information. If Atom is not a data controller for your personal data, you should request this information from the relevant data controller.

We may transfer personal information to companies that help us provide our Service, and when we do, these transfers to subsequent third parties are, wherever possible, covered by appropriate transfer agreements. We will retain personal data we process on behalf of our customers as needed to provide Services to our customer and to the extent required for our internal general administration. Also, we will retain this personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Atom maintains a global infrastructure for support and development. Information that we collect and maintain may be transferred to and/or processed in the UK, the United States and/or India. When you provide us with information, or use our website(s) and services, you consent to this transfer. We will protect the privacy and security of personal information we collect in accordance with this privacy policy, regardless of where it is processed or stored. Any personal data that is transferred within the Atom Group is transferred under the terms of an intra-group data transfer agreement which applies the standard of the EU Model Contractual Clauses to these transfers.

7. Transfers of your information out of the EEA

We will not transfer your personal information outside of the EEA at any time.

8. Security

Atom follows generally accepted standards to protect the personal information, if any, submitted to us, both during transmission and once it is received, however, no security measure is perfect.

9. Changes to this Statement/Contact Us

We may update this privacy policy to reflect changes to our information practices. If we make any material changes we will provide notice on this website, and we may notify you by email (sent to the e-mail address specified in your account), prior to the change becoming effective. We encourage you to

periodically review this page for the latest information on our privacy practices. If you continue to use the Services after those changes are in effect, you agree to the revised policy.

10. Contacting Atom

Please contact Atom at info@atomconsulting.co if:

- you have any questions about this Privacy Policy or Atom practices relating to privacy;
- we hold personal information about you and you want it to be removed from our database or opt out from receiving communications from us; or
- if we hold personal information about you and you want to opt out from receiving communications from us; or
- if you need assistance in reviewing your information.

Atom will respond to your request within a reasonable time.