

PRIVACY POLICY FOR TRACEOLOGY© v1.0 June 2023

1. INTRODUCTION

1.1 This privacy policy covers the following web portals and mobile apps relating to Traceology© services:

- Traceology© Manager;
- Traceology© eVerification;
- Traceology© Mobile App.

2. WHO WE ARE

2.1 De La Rue International Limited, a company registered in England and Wales with company registration number 00720284, whose registered address is at De La Rue House, Jays Close, Viables, Basingstoke, Hampshire RG22 4BS (**De La Rue**) is the controller and is responsible for your personal data.

2.2 De La Rue respects your right to privacy and will process personal information you provide only in accordance with the General Data Protection Regulation, Data Protection Act 2018, the Privacy and Electronic Communications (EC Directive) Regulations 2003 and other applicable privacy laws.

3. THE INFORMATION COLLECTED AND HOW IT IS USED

3.1 We will only use your personal data when the law allows us to do so.

3.2 We have listed below the types of personal data about you which we may collect, use, store and transfer, the purpose for which we are collecting it, and the lawful basis for processing relating to each type of personal data. We will also keep your contact details to inform you of any changes to this privacy policy (and therefore comply with our legal obligations). In addition, please note that if you contact us for any reasons, we will keep a record of that correspondence for as long as legally permissible.

Traceology© Manager

Personal Data	Purpose	Lawful basis for processing
Username	User authentication	Performance of a contract with you
Name	To greet the user and show identity in logs and events	Performance of a contract with you
Business address	Access controls	Performance of a contract with you
Phone number / fax Email address	To provide application support and password management.	Performance of a contract with you
IP address	To throttle log in attempts (security)	Legitimate interest

Traceology© eVerification

Personal Data	Purpose	Lawful basis for processing
IP address	To throttle log in attempts (security)	Legitimate interest

Personal Data	Purpose	Lawful basis for processing
Name * Email address * Mobile number *	To install the app and register you as a new app user	Performance of a contract with you
Company Association *	Access controls	Legitimate interest
Geolocation (latitude and longitude)	Access controls and detecting product diversions	Your consent
Network IP	Account security and setting user preferences	Legitimate interest
Device ID	Continuity of access to the app	Legitimate interest

We also collect your device information (such as brand and model, operating system version and serial number), and information about the scanned product (such as the scanned code, your response to each product question you submitted through the app, and the counterfeit incident details provided by you *). Any such data is anonymised but if at any point we combine or connect this data with your personal data so that it can directly or indirectly identify you, we will treat the combined data as personal data and it will be used in accordance with this privacy policy.

* collected from registered users only

3.3 We do not collect any special category personal data about you (such as: details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, or genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

4. COOKIES

4.1 We use the following cookies:

4.1.1 **Strictly necessary cookies.** These are cookies that are required for the operation of the website. They include, for example, cookies that enable you to log into the app.

4.1.2 **Analytical or performance cookies.** These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it and with what browser and operating system they are using it. This helps us to improve the way our website works, for example, by ensuring that the user's browser is supported language translations are added when appropriate.

4.1.3 **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region, products, query history, or recent selections).

4.2 You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie name	Purpose	Category	Duration	First or third party?
traceology_manager_session	Identify the session in use. Keeps the user logged in.	Strictly Necessary	1 hour from last activity	First
last_session_activity	Support session expiration warning across tabs.	Strictly Necessary	Session	First
XSRF-TOKEN	Prevent cross site request forgery.	Strictly Necessary	1 hour from last activity	First
_ga _ga_1X0W565WV4	Google Analytics – Used to distinguish users and sessions. Details	Analytical or performance cookies	2 years from set/update	First
serialInputMethod	Remembers the previous tool selections to make the user interface more intuitive.	Functionality Cookies	30 days	First
traceology_verification_id	Used to identify returning users, return cached results to reduce confusion for users, help identify brute force attacks and bots.	Functionality Cookies	1 year	First
access_token	Authenticates the user for specific resources on the application server.	Strictly necessary cookies	Life of the session	First
Lang	Stores the Language selected by the user	Functionality Cookies	Life of the session	First
refresh_token	Allows the application to request a new or updated access_token.	Strictly necessary	Life of the session	First
userInfo	Stores the users profile for use in the application.	Strictly necessary	Life of the session	First
cookie_consent	Stores user’s response to use optional cookies.	Strictly necessary	1 year	First

For further information about Google Analytics, visit:

- [Google's Privacy Policy](#)
- [Google Analytics Help pages.](#)

4.3 Please note that the following third parties may also use cookies, over which we have no control. These third-party cookies are likely to be analytical cookies or performance cookies:

Cookie name	Purpose	Category	Duration	First or third party?
1P_JAR	Used by Google Content Delivery Network (fonts).	Analytical or Performance Cookies	30 days	Third

To deactivate the use of third-party advertising cookies, you may visit the consumer page to manage the use of these types of cookies <https://policies.google.com/technologies/cookies>.

5. DISCLOSURE TO THIRD PARTIES AND INTERNATIONAL TRANSFERS

5.1 To deliver our services to you, it is sometimes necessary for us to share your personal data outside of the UK or EEA, for example:

- with our service providers;
- with De La Rue group companies with offices outside of the UK or EEA; or
- if you are based outside of the UK or EEA.

5.2 We will not transfer your personal data out of the UK, unless we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- transferring your personal data to countries that have been deemed to provide an adequate level of protection for personal data; or
- entering into standard contractual clauses that have been approved for use in the UK and which give personal data the same protection it has in the UK.

5.3 We may disclose your personal data:

- to any of our group companies (for operational reasons);
- to our service providers (e.g. hosting services providers);
- to the brand owner(s) of the products you query/update using De La Rue Traceology® services;
- to a prospective buyer or seller, in the course of our own business operations. If any change happens to our business, then the new owners or business partners may use your personal data in the same way as set out in this privacy policy; or
- where we required to do so by applicable law, by a governmental body or by a law enforcement agency,

but will not otherwise disclose, sell or rent your personal information to any third party unless you have consented to this. If you do consent but later change your mind, you may contact De La Rue (at dataprotection@delarue.com quoting "Traceology – withdrawal of consent") to ask for any such activity to stop.

6. SECURITY

6.1 Whilst De La Rue takes appropriate technical and organisational measures to safeguard the personal information that you provide, no transmission over the Internet can ever be guaranteed secure. Consequently, please note that the security of any personal information that you transfer over the Internet to De La Rue cannot be guaranteed.

6.2 De La Rue has 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 or where it is otherwise prudent to do so.

7. DATA RETENTION

7.1 De La Rue will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. De La Rue may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

7.2 To determine the appropriate retention period for personal data, De La Rue considers the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

8. YOUR RIGHTS

8.1 You have the right to:

- request access to the personal data that we hold about you;
- request correction of the personal data that we hold about you;
- request erasure of the personal data that we hold about you (where there is no good reason for us continuing to process it);
- object to processing of your personal data (where we are relying on a legitimate interest to process the data);
- request the transfer of your personal data to you or to a third party (where your personal data is in an automated form and used by us for the purposes of a contract); and
- request that we suspend processing of your personal data if:
 - you want us to establish the data's accuracy;
 - our use of the data is unlawful but you do not want us to erase it;
 - you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

9. CONTACT US

If you wish to exercise any of the rights set out above, or have any questions regarding the information contained in this privacy policy, please write to De La Rue at the address specified in section 2.1 of this document or at dataprotection@delarue.com. **You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so we request that you please contact us in the first instance.**