



Privacy Policy

Effective Date: 31/05/2023

At CAPS® (Entegral® Holdings Ltd), and our affiliates (collectively, “CAPS”, “we” or “us”), we respect your privacy. We have implemented this privacy policy ("Privacy Policy") to explain our data collection and use practices. You can learn more in the sections below.

Please refer to your CAPS User Agreements for any provisions relating to the information you provide about your customers, suppliers, service providers and other data that is otherwise uploaded or provided through the use of the Services or Products by you or on your behalf (“Company Data”).

Organisation	Contact Information
CAPS® (Entegral® Holdings Ltd)	CAPS Principle Office, Melburne Park Vicarage Road, Egham, Surrey TW20 9FB privacy@caps.co.uk

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The Types of Information We Collect

Personal Information

We may collect personal information about you in connection with the CAPS applications and websites. When such information is gathered, we will collect the minimum amount necessary to (i) facilitate your requests and to (ii) improve the CAPS applications and websites and your user experience. The personal information we may collect includes:

- Name;
- Postal address;
- Telephone number;
- Email address;
- User name and log-in credentials
- VAT registration number; and
- Company registration number

Information Collected and Stored Automatically

By visiting the CAPS applications and websites, certain information may be automatically provided to us by your device. For each visitor to the CAPS applications or websites, our platform may automatically recognise the visitor's domain name or IP address. An IP address is a number assigned to your device when you connect to the Internet. As part of the protocol of the Internet, web servers can identify your device by its IP address.

In addition, we may collect your browser type and operating system, mobile device brand, model, mobile operation system and carrier (if applicable).

Cookies & Similar Technologies

Cookies are short strings of text sent from a web server to a web browser when the browser accesses a website. We may use cookies or similar technologies to analyse the traffic on the CAPS applications and websites (such as total visitors and pages viewed), to personalise features and content and to make improvements to the website based on the data we collect. We do not save passwords or other sensitive information in cookies.

We use the following category of cookies:

- **Strictly Necessary Cookies**

These cookies are essential in order to enable you to move around the platform and use its features. Without these cookies, services you have asked for such as remembering your login details cannot be provided.



- **Performance Cookies**

[Google Analytics] cookies to help us understand how users arrive at our platform, browse or use our platform and highlight areas where we can improve areas such as navigation.

- **Targeting Cookies or Advertising Cookies**

These cookies collect information about your browsing habits in order to make advertising more relevant to you and your interests. They are also used to limit the number of times you see an advert as well as help measure the effectiveness of an advertising campaign. The cookies are usually placed by third party advertising networks. They remember the websites you visit and that information is shared with other parties such as advertisers. For example, we use third party companies such as [YouTube] to provide you with more personalised adverts when visiting other websites.

How Collected Information Is Used

We use the information we collect for the following purposes:

	Purposes	Lawful basis
1	To send you important information regarding the Site, Services or Software Products, changes to CAPS terms and conditions or policies and/or other administrative information.	The processing is necessary (i) for the performance of a contract to which the claimant/your organisation is a party or in order to take steps at the request of the claimant/your organisation prior to entering into a contract, (ii) our legitimate interest (i.e. processing for preventing fraud), and/or (iii) for compliance with a legal obligation. In certain limited circumstances and where required by law, the processing will be based on consent (e.g. electronic direct marketing, cookies).
2	To provide products and services you request, for example, CAPS Updates, information about new services, password change requests and provide you with related customer service.	
3	To service your account with us, respond to your questions and contact you when necessary	
4	To assist us in providing better products and services	
5	To compile statistics and analysis about the CAPS Application and services that are used to enable us to provide better service, products, features and functionality to you and other users in the future	
6	To advertise and market our products and services	
7	To protect our rights and property	The processing is necessary (i) for compliance with a legal obligation and/or (ii) for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.
8	To share information with government and regulatory authorities when required by law or in response to legal process, obligation, or request.	



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Data Retention

Except where prohibited by law, we retain information we collect for commercially reasonable periods of time or in accordance with specific policies. Information collected for a specified purpose will only be used for that purpose and, after a reasonable period of time, will no longer be actively stored when that purpose has been fulfilled. Inactive data may, however, continue to be used for statistical, archiving, and other analytical purposes.

With Whom the Information May Be Shared

Internally and with our Service Providers

We may disclose the information we collect from and about you to our subsidiaries and service providers acting on our behalf for the purpose of providing the transactions you have requested. Our affiliates, providers and our subsidiary employees in our IT, application systems, and help desk divisions may use your information, as described in this Privacy Policy.

Legal or sale

We also may disclose your information to other third parties: (1) when required by law or in response to legal process; (2) without legal process in response to a request from law enforcement relating to a criminal investigation; (3) to protect our rights, privacy, safety or property, or of the public; (4) for administrative, technical support or other business purposes to provide our services to you, analyse our data, or to maintain and improve our services (subject to confidentiality agreements as appropriate); (5) to permit us to pursue available remedies or limit damage that we may sustain; (6) to enforce the terms of any agreement or the CAPS applications and websites; (7) to process any transaction with our subsidiaries, affiliates or licensee/franchisee located in the country in which you may place a reservation; (8) if the rights of another individual might be violated and; (9) otherwise with your consent.

CAPS, its subsidiaries or its affiliates may sell or buy other businesses or entities. In such transactions, personal information may be one of the transferred business assets. Also, in the event that the CAPS, or substantially all of its assets are acquired, your personal information may be one of the transferred assets. You will be notified via email or prominent notice on the CAPS applications or website for thirty (30) days of any such change in ownership or control of your personal information.



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Transfers and Processing

Information you provide in using CAPS is processed and stored in the following locations:

- For European related CAPS Services: Personal information is processed, and stored on servers located, within the European Economic Area.
- For North America related CAPS Services: Your data may be accessed by our help desk team in North America but no CAPS data is transferred outside the European Economic Area.

When Connecting the Industry™ viewing personal data to countries outside the European Economic Area, we comply with European Union law by using standard contract clauses approved by the European Commission, or by adopting other means to ensure that adequate safeguards are applied.

Correcting or Changing Your Information/Questions

The entity which employs you is the entity responsible (i.e. the data controller) for data in the CAPS applications and websites.

The accuracy and completeness of the information we collect is very important to us and we make efforts to ensure that the information we have is accurate and up-to-date. If you (i) have questions about the CAPS' use of your personal information or (ii) would like to review, amend, correct, update or delete personal information about you, limit how we use it, please contact your employer's representatives/management.

We reserve the right not to allow access to your information if we believe in good faith that such disclosure is prohibited by law or if the rights of another individual might be violated.

Changes in Terms

We may update this Privacy Policy to reflect changes to our information practices. If we make any material changes, we will notify (i) you, (ii) your organisation/employer by e-mail and/or (iii) by means of a notice on this platform prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.