

## **Zyta Capital Privacy and Cookies Policy**

Zyta Capital (we) promise to respect any personal data you share with us through this site (the Website) or any other means. We aim to be transparent when we collect your data and not to use your information in any way that you would not reasonably expect.

Developing a better understanding of your preferences through your personal data enables us to ensure that you are receiving the information that interests you most, and even more importantly allows us to ensure that you are able to play an active role in the Standard Setting Process.

This Privacy and Cookies Policy (the Policy) explains how Zyta Capital uses your personal data if and when it is collected and provides information about the cookies that we use on the Website. This Policy is designed to ensure that you are fully aware of how your personal data is processed and stored so that we can fulfil our legal and moral obligations toward you as a data subject.

If you do not agree with this Policy or the [Terms of Use](#) please do not use any part of this Website. If you signify acceptance of this Policy, this constitutes a positive action confirming your consent for us to use the personal data you provide to us in accordance with this Policy.

### **Contents**

#### **1. Personal information we collect**

Zyta Capital may collect the following information from you in the course of your use of the Website:

- your name;
- your contact details (including home address and telephone number);
- your preferences in relation to the communications that you would like to receive.

We do this in order for us to communicate with you regarding:

- the general objectives of Zyta Capital;
- providing any services ordered or requested by you;
- marketing to you the services of Zyta Capital;
- keeping you informed of Zyta Capital activities;
- administration and archiving;
- processing any enquiries or complaints raised by you and responding to any communications from you;
- statutory and regulatory compliance;

- investigating any misuse by any person of our products and any accusation of wrongdoing;
- maintaining a record of your relationship with us.

## **2. Registration**

In order to register to receive any alerts and communications from us or to subscribe for any of our subscription services featured on the Website, you may be requested to provide relevant personal information, which we need to process your registration. The personal information provided upon registration allows us to deliver our services, as well as allowing us to maintain your account. As a registered user of the Website you will be entitled to receive information regarding our work and services including invitations to events and seminars. Sometimes we may contact you by email, post or telephone for research purposes relating to our Websites or to research opinion on proposed developments if you have consented to such communications.

## **3. Sharing your information**

When you register for any of our services including subscription services, the information you provide is for our purposes only. We do not share your personal data with any third parties for marketing purposes. However, we do require that you acknowledge and agree that we may occasionally use third party providers to conduct research, process data or develop and maintain the Website and its content on our behalf.

## **4. Direct marketing**

If you have consented to receive direct-marketing emails you have the right to revoke your consent at any time. You may do this by using the unsubscribe link at the bottom of emails you receive.

## **5. Cookies**

Our Website uses cookies to distinguish you as an individual user. This helps us to provide you with a tailored experience when you browse our Website and also allows us to improve the Website through data analysis. By continuing to browse the Website, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you click the 'agree' button in the cookie notification pop-up at the footer of your browser. Cookies contain information that is transferred to your computer hard drive. The cookies function by saving your Website preferences and as a result it is possible to speed up your future activities at the Website and allows us to provide you with information specifically tailored to your interests.

Most browsers allow you to stop receiving cookies; however, you should be aware that if you do disable cookies, you may have trouble logging into Zyta Capital areas, and you will have to agree to the Terms of Use and this Policy every time you visit the Website.

We use the following cookies:

1. Strictly necessary cookies: these are cookies that are required for the operation of our Website.
2. Analytical/performance cookies: they allow us to recognise and count the number of visitors and to see how visitors move around our Website when they are using it. This helps us to improve the way our Website works, for example, by ensuring that users are finding what they are looking for easily.
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 and whether you have agreed to the Terms of Use and this Policy).

We do not allow access to Third Party Cookies to users of the Website. This means that no third-party advertising preference cookies will be stored and no other entity other than Zyta Capital will be able to access your information if you visit our Website.

We also use Google Analytics to monitor the use of our Website. This means that information contained in the cookie about your use of the Website is transmitted to Google and a report is prepared for us setting out how the Website is used. This analysis does not involve storing your personal data as detailed in [Google's Privacy Policy](#).

Below we list the cookies that are used on each of the Website and a brief explanation of what they do:

**Our Cookies:**

Google may use other analytics cookies in addition to the ones we've listed above, so please [visit Google for a full list](#).

**6. Withdrawal of consent**

Prior to processing your personal data Zyta Capital ensures that it is entitled to do so under relevant data protection laws. If you have consented to receiving direct-marketing emails you have the right to revoke your consent at any time. If you receive any other type of communication from Zyta Capital, these will include an option for you to unsubscribe from such communications.

Please be aware that there may be other grounds under which Zyta Capital may be entitled to process your personal data, for example in order to provide services to you.

## **7. European Economic Area (EEA)**

Please note that your personal data may be transferred outside of the EEA so that we can provide you with your requested services. Where such transfers are made it will be in accordance with applicable data protection laws to ensure sufficient protection of your personal data. If you have any concerns in relation to such transfers, please email [info@zytacapital.com](mailto:info@zytacapital.com)

## **8. Continued Processing**

Zyta Capital may continue to process your personal data after you have ceased to be a user of our Website, or if we have sent you any information requested by you for as long as is necessary and whilst there is a condition under applicable data protection laws and regulations which permits us to do so.

## **9. Surveys**

From time to time we may ask you to complete research surveys so we can improve our products and services. Your responses to such surveys will be used only for internal planning and development purposes to achieve these aims.

## **10. Changes to the Privacy and Cookies Policy**

From time to time, we may amend the way in which we process personal data to enhance the level of service that we offer to you. This may lead to changes in how we collect and/or use your personal information. Any such changes will be notified to you either at the point any new personal information is collected, or by us updating this Policy. You will then be asked to accept the new terms of this Privacy and Cookies Policy before you are able to continue using the Website.

## **11. Security and confidentiality**

Any personal information you send to us will be treated with utmost confidence unless you are informed otherwise. However, please be aware that despite the security measures we have in place, no computer system is completely secure and there is always some degree of risk whenever personal information is transferred.

## **12. Monitoring of telephone calls and e-mails**

Your telephone calls and e-mails to us may be recorded and monitored for quality control purposes. We may also intercept communications made to individual members of staff at Zyta Capital when this is required for business purposes.

## **13. Your right to know what we know about you, make changes or ask us to stop processing your personal data**

You have a right to ask us to stop processing your personal data, and if we do not need to process your data to carry out a service for you or communicate with you; or as permitted or required by law; we will cease all processing activities immediately.

You also have a right to ask for a copy of the information we hold about you. We will require valid identification (original driving licence or passport). If there are any discrepancies in the information we provide, please let us know and we will correct them.

If you have any concerns, or if you would like us to stop processing your personal data or you would like a copy of the information we hold about you, please email [info@zytacapital.com](mailto:info@zytacapital.com) with your queries or request.

## **14. Contact us**

If you have any queries relating to this Privacy Statement and Cookies Policy or you wish to notify us about any of the matters set out above, please feel free to contact us.

This Privacy Statement was last updated: **July 2018**