

WELCOME TO NAVRO'S PRIVACY POLICY: SECTION 4

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

- **4.4** We have set out below, in a table format, a description of all the ways we plan to use your Personal Data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.
- **4.5** Note that we may process your Personal Data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your Personal Data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing
		including basis of legitimate
		interest
To register you as a	(a) Identity	Performance of a contract with
new customer	(b) Contact	you
Accessing our	(a) Identity	Performance of a contract with
Developer Portal	(b) Contact	you; during sign-up process to
	,	provide you with our sandbox
		services and access to our
		systems.



To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy	 (a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications (a) Identity (b) Contact (c) Profile (d) Marketing and Communications 	 (a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) (c) Necessary to comply with a legal obligation (a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary to comply with a legal obligation (d) Necessary to comply with a legal obligation (e) Necessary for our legitimate interests (to keep our records updated and to study how
(b) Asking you to leave a review or take a survey		customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity(b) Contact(c) Profile(d) Usage(e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)



To administer and	(a) Identity	(a) Necessary for our legitimate
protect our business	-	interests (for running our
and this website	(b) Contact	business, provision of
(including	(c) Technical	administration and IT services,
troubleshooting, data		network security, to prevent fraud
analysis, testing,		and in the context of a business
system maintenance,		reorganisation or group
support, reporting		restructuring exercise)
and hosting of data)		(b) Necessary to comply with a
		legal obligation
To deliver relevant	(a) Identity	Necessary for our legitimate
website content and	(b) Contact	interests (to study how customers
advertisements to you		use our products/services, to
and measure or	(c) Profile	develop them, to grow our
understand the	(d) Usage	business and to inform our
effectiveness of the	(e) Marketing and	marketing strategy)
advertising we serve	Communications	
to you.		
	(f) Technical	
To use data analytics	(a) Technical	Necessary for our legitimate
to improve our	(b) Usage	interests (to define types of
website,	.	customers for our products and
products/services,		services, to keep our website
marketing, customer		updated and relevant, to develop
relationships and		our business and to inform our
experiences.		marketing strategy)



To make suggestions	(a) Identity	Necessary for our legitimate
and	(b) Contact	interests (to develop our
recommendations to	, ,	products/services and grow our
you about goods or	(c) Technical	business)
services that may be	(d) Usage	
of interest to you. For	(e) Profile	
example, an email	(f) Marketing and	
newsletter	(i) Marketing and	
	Communications	

Marketing

4.6 We strive to provide you with choices regarding certain Personal Data uses, particularly around marketing and advertising. All email newsletters or marketing emails have an unsubscribe link and all opt-outs will be actioned and respected. You can ask us to stop sending you marketing messages at any time.

Promotional offers from us

- **4.7** We may use your Identity, Contact, Technical, Usage and Profile 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 (we call this marketing).
- **4.8** You will receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing.

Third-party marketing

4.9 We will get your express opt-in consent before we share your Personal Data with any third party for marketing purposes.

Navro Limited is a company registered in England and Wales with Company number 13854323 Registered

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Opting out

- **4.10** You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences, or by following the opt-out or unsubscribe links on any marketing message sent to you OR by contacting us at any time on Compliance@Navro.com
- **4.11** Where you opt out of receiving these marketing messages, this will not apply to Personal Data provided to us as a result of a product or service purchase or a product or service experience.

Cookies

- **4.12** Our website uses cookies for a range of functions. We use essential cookies, for which your consent is not required, for the following purposes:
 - Account authentication
 - Security and fraud prevention
 - Preference cookies for the cookie consent tool
 - Load balancing
- **4.13** We also use cookies or similar technologies for analytics.
- **4.14** We have put in place a cookie consent tool which explains the cookies we use and seeks consent to these. Our cookie policy sets out in more detail the types of cookies we use and the purposes we use them for. You can change your mind at any time about your cookie preferences.
- **4.15** You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use and to set your preferences, please see our cookie policy.

Change of purpose

4.16 We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to



how the processing for the new purpose is compatible with the original purpose, please contact us.

- **4.17** If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- **4.18** Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.