

The logo for Matter. consists of a solid teal square with the word "Matter." written in white, sans-serif font inside it.

Matter.

# Privacy and Cookies Policy

Last review 12 of May, 2022

This Privacy and Cookies Policy describes Our policies and procedures on the collection, use and disclosure of Your Personal Data when You use the Matter Environment and tells You about Your privacy rights and how the law protects You.

We use Your Personal data to provide and improve the Matter Environment.

By using the Matter Environment, You agree to the collection and use of Your Personal Data in accordance with this Privacy and Cookies Policy.

## 1. Interpretation and Definitions

### Interpretation and Definitions

Certain words in this Privacy and Cookies Policy in which the initial letter is capitalised have the following meanings (and have the same meaning regardless of whether they appear in singular or in the plural).

Defined Word or Term	Definition
<b>Affiliates:</b>	means Our parent company and any other direct or indirect subsidiaries of Ours and /or of Our parent company, joint venture partners or other companies that We control or that are under common control with Us.
<b>Company:</b> (referred to as either "the Company", "We", "Us" or "Our" in this Privacy and Cookies Policy)	means Inheriting Earth Limited, Unit 5, Avon Trading Estate, 20A Albert Road (trading as <b>Matter</b> )
<b>Cookies:</b>	means small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.
<b>Data Controller:</b>	means a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any Personal Data is, or is to be, Processed.
<b>Data Processor:</b>	means a person (other than an employee of the Data Controller) who Processes the Personal Data on behalf of the Data Controller.
<b>Data Subject:</b>	means a living individual identified by the Personal Data.

<b>Device:</b>	means any device that can access the Matter Environment, such as a computer, a cellphone or a digital tablet.
<b>Matter Environment:</b>	means any method or technology used by Matter to Process your Personal Data.
<b>Personal Data:</b>	<p>means data which relates to a living individual who is identified or can be identified:</p> <ul style="list-style-type: none"> <li>• from that data; or</li> <li>• from that data and other information, which is in the possession of, or is likely to come into the possession of the Data Controller;</li> </ul> <p>including (without limitation) any information relating to You such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity.</p>
<b>Privacy Laws:</b>	for purposes of Processing of Personal Data relating to Data Subjects who are: (i) located in; or (ii) citizens of; the United Kingdom, means any laws in force from time to time relating to data protection, privacy, confidentiality, or security, including, but not limited to the UK General Data Protection Regulation (UK GDPR), adapted to the UK Data Protection Act 2018, any regulations and legislation which amends, re-enacts or replaces the UK GDPR, and any amendments to UK GDPR.
<b>Process / Processing:</b>	means any operation or set of operations performed on Personal Data or sets of Personal Data whether by automated means such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.
<b>Service Provider:</b>	means any natural or legal person who processes Personal Data on behalf of the Company. It refers to third-party companies or individuals used by the Company to facilitate the Matter Environment, provide the Matter Environment on behalf of the Company, perform services related to the Matter Environment, or assist the Company in analysing how the Matter Environment is used.

<b>Third-party Social Media Service:</b>	refers to any website or any social network website through which a user can use the Matter Environment.
<b>Usage Data:</b>	refers to data collected automatically, either generated by the use of the Matter Environment or from the Matter Environment infrastructure itself (for example, the duration of a page visit).
<b>Website</b>	means the website at <i>Matter. industries</i> , accessible from <a href="https://matter.industries/">https://matter.industries/</a>
<b>You:</b> (and "Your" has the equivalent meaning in context)	means the individual accessing or using the Matter Environment, or the Company, or other legal entity on behalf of which such individual is accessing or using the Matter Environment, as applicable. Under UK GDPR (General Data Protection Regulation), You can be referred to as the Data Subject or as the User as you are the individual using the Matter Environment.

## 2. Collecting and Using Your Personal Data

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### 2.1 Types of Data Collected

#### Personal Data

While accessing or using the Matter Environment, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Usage Data
- For Matter employees, your HR records kept with your consent in accordance with Company policies and reasonable requirements

## Usage Data

Usage Data is collected automatically when using the Matter Environment.

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of the Matter Environment that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Matter Environment by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit the Matter Environment or when You access the Matter Environment by or through a mobile device.

## 2.2 Tracking Technologies and Cookies

We use Cookies and similar tracking technologies to track the activity on the Matter Environment and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyse the Matter Environment. The technologies We use may include:

- **Cookies or Browser Cookies.** A cookie is a small file placed on Your Device. You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of the Matter Environment. Unless you have adjusted Your browser setting so that it will refuse Cookies, the Matter Environment may use Cookies.
- **Flash Cookies.** Certain features of the Matter Environment may use local stored objects (known as **Flash Cookies**) to collect and store information about Your preferences or Your activity on the Matter Environment. Flash Cookies are not managed by the same browser settings as those used for Browser Cookies. For more information on how You can delete Flash Cookies, please read "*Where can I change the settings for disabling, or deleting local shared objects?*" available at [https://helpx.adobe.com/flash-player/kb/disable-local-shared-objects-flash.html#main\\_Where\\_can\\_I\\_change\\_the\\_settings\\_for\\_disabling\\_\\_or\\_deleting\\_local\\_shared\\_objects\\_](https://helpx.adobe.com/flash-player/kb/disable-local-shared-objects-flash.html#main_Where_can_I_change_the_settings_for_disabling__or_deleting_local_shared_objects_)
- **Web Beacons.** Certain sections of the Matter Environment and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be "**Persistent**" or "**Session**" Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser. Learn more about cookies: *Cookies: What Do They Do?*.

We use both Session and Persistent Cookies for the purposes set out below:

- **Necessary / Essential Cookies**

**Type:** Session Cookies

**Administered by:** Us

**Purpose:** These Cookies are essential to provide You with services available through the website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the Matter Environments that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.

- **Cookies Policy / Notice Acceptance Cookies**

**Type:** Persistent Cookies

**Administered by:** Us

**Purpose:** These Cookies identify if users have accepted the use of cookies on the website.

- **Functionality Cookies**

**Type:** Persistent Cookies

**Administered by:** Us

**Purpose:** These Cookies allow us to remember choices You make when You use the website, such as remembering your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the website.

## 2.3 Use of Your Personal Data

The Company may use Personal Data for the following purposes:

- **To provide and maintain the Matter Environment:** including to monitor the usage of the Matter Environment.
- **To manage:** Your use of the Matter Environment. The Personal Data You provide can give You access to different functionalities of the Matter Environment.

- **For the performance of a contract:** the development, compliance and undertaking of the purchase contract for the products, items or services You have purchased or of any other contract with Us through the Matter Environment.
- **To contact You:** To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- **To provide You** with news, special offers, and general information about other goods, services, and events that we offer that are similar to those you have already purchased or enquired about unless You have opted not to receive such information.
- **To manage Your requests:** To attend and manage Your requests to Us.
- **For business transfers:** We may use Your information to evaluate or conduct a merger, divestiture, restructuring, reorganisation, dissolution, or another sale or transfer of some or all of Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Us about the users of the Matter Environment is among the assets transferred.
- **To manage you as an employee** (applicable to Matter employees only)
- **For other purposes:** We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of Our promotional campaigns and to evaluate and improve the Matter Environment, products, services, marketing and Your experience.

We may share Your Personal Data in the following situations (other than for Matter employees whose Personal Data will only be shared under the final bullet – with informed consent of the employee):

- **With Service Providers:** We may share Your Personal Data with Service Providers to monitor and analyse the use of the Matter Environment and for them to contact You for that purpose.
- **For business transfers:** We may share or transfer Your Personal Data in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company.
- **With Affiliates:** We may share Your Personal Data with Our Affiliates, in which case We will require those Affiliates to comply with this Privacy and Cookies Policy.
- **With business partners:** We may share Your Personal Data with Our business partners to offer You certain products, services or promotions.
- **With other users:** when You share Personal Data or otherwise interact in the public areas with other users of the Matter Environment , such information may be viewed by all users and may be publicly distributed outside. If You interact with other users or register through a Third-Party Social Media Service, Your contacts

on the Third-Party Social Media Service may see Your name, profile, pictures and description of Your activity. Similarly, other users will be able to view descriptions of Your activity, communicate with You and view Your profile.

- With Your informed consent: We may disclose Your Personal Data for any other purpose with Your informed consent.

## **2.4 Retention of Your Personal Data**

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy and Cookies Policy. We will retain and use Your Personal Data to the extent necessary to comply with Our legal obligations (for example, if We are required to retain Your Personal Data to comply with applicable laws), resolve disputes, and enforce Our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this Usage Data is used to strengthen the security or to improve the functionality of the Matter Environment, or We are legally obligated to retain this Usage Data for longer time periods.

## **2.5 Transfer of Your Personal Data**

Your Personal Data is Processed at the Company's or its Affiliates' operating offices and in any other places where the parties involved in the Processing are located. It means that this Personal Data may be transferred to — and maintained on — computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ from those from Your jurisdiction.

**Your consent to this Privacy and Cookies Policy followed by Your submission of such Personal Data represents Your agreement to that transfer.**

The Company will take all steps reasonably necessary to ensure that Your Personal Data is treated securely and in accordance with this Privacy and Cookies Policy and no Processing of Your Personal Data will take place in an organisation or a country unless there are adequate controls in place, including the security of Your Personal Data.

## **2.6 Disclosure of Your Personal Data**

### **Business Transactions**

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be disclosed. We will use all reasonable endeavours (subject to applicable laws, regulations and obligations of confidentiality to third parties) to give you notice before Your Personal Data is disclosed.

### **Law enforcement**

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).



## Other legal requirements

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- comply with a legal obligation
- protect and defend the rights or property of the Company
- prevent or investigate possible wrongdoing in connection with the Matter Environment
- protect the personal safety of users of the Matter Environment or the public
- protect against legal liability.

### 2.7 Security of Your Personal Data

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

## 3. UK GDPR Privacy

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### 3.1 Legal Basis for Processing Personal Data under UK GDPR

We may Process Personal Data under the following conditions:

- **Consent:** You have given Your informed consent for Processing Personal Data for one or more specific purposes.
- **Performance of a contract:** Provision of Personal Data is necessary for the performance of an agreement between Us and You and/or for any pre-contractual obligations connected to that agreement.
- **Legal obligations:** Processing Personal Data is necessary for compliance with a legal obligation to which the Company is subject.
- **Vital interests:** Processing Personal Data is necessary in order to protect Your vital interests or of another natural person.
- **Public interests:** Processing Personal Data is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Company.
- **Legitimate interests:** Processing Personal Data is necessary for the purposes of the legitimate interests pursued by the Company.

In each case, the Company will gladly help to clarify the specific legal basis that applies to the Processing, and in particular, whether the provision of Personal Data is a statutory or contractual requirement or a requirement necessary to enter into a contract.

### 3.2 Your Rights under UK GDPR

The Company undertakes to respect the confidentiality of Your Personal Data and to guarantee. You can exercise the following rights under this Privacy and Cookies Policy, and by law if You are within the UK:

- **Request access to Your Personal Data.** The right to access, update or delete the Personal Data We have on You. Whenever made possible, You can access, update or request deletion of Your Personal Data directly within Your account settings section. If You are unable to perform these actions, please contact Us to assist You. This also enables You to receive a copy of Your Personal Data that We hold.
- **Request correction of the Personal Data that We hold about You.** You have the right to require Us to correct any incomplete or inaccurate information We hold about You..
- **Object to Processing of Your Personal Data.** This right exists where We are relying on a legitimate interest as the legal basis for Our Processing and there is something about Your particular situation, which makes You want to object to our Processing of Your Personal Data on this ground. You also have the right to object where We are Processing Your Personal Data for direct marketing purposes.
- **Request erasure of Your Personal Data.** You have the right to ask Us to delete or remove Personal Data when there is no good reason for Us to continue Processing it.
- **Request the transfer of Your Personal Data.** We will provide to You, or to a third-party You have chosen, Your Personal Data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which You initially provided consent for Us to use or where We used the information to perform a contract with You.
- **Withdraw Your consent.** You have the right to withdraw Your consent on Processing your Personal Data. If You withdraw Your consent, We may not be able to provide You with access to certain specific functionalities of the Matter Environment.

### 3.3 Exercising Your UK GDPR Data Protection Rights

You may exercise Your rights of access, rectification, cancellation and opposition by contacting Us. Please note that We may ask You to verify Your identity before responding to such requests. If You make a request, We will try our best to respond to You as soon as possible. You have the right to complain to the Information Commissioner's Office in UK about Our collection and Processing of Your Personal Data.

## 4. Children's Privacy

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The Matter Environment does not intentionally collect Personal Data from anyone under the age of 13. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 13 without verification of parental consent, We will remove that information from Our servers.

If We need to rely on consent as a legal basis for processing Your information, We require a parent's informed consent before We collect and use collected Personal Data from anyone under the age of 13.

## 5. Links to Other Websites

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The Matter Environment may contain links to other websites that are not operated by Us. If You click on a third party link, You will be directed to that third party's site. We strongly advise You to review the Privacy and Cookies Policy of every site You visit.

We have no control over, and assume no responsibility for, the content, privacy policies or practices of any third party sites or services.

## 6. Changes to this Privacy and Cookies Policy

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We may update this Privacy and Cookies Policy from time to time by posting the new Privacy and Cookies Policy on <https://matter.industries> and by adjusting the "Last updated" at the top of this Privacy and Cookies Policy.

You are advised to review this Privacy and Cookies Policy periodically for any changes.

## 7. Contact Us

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If you have any questions about this Privacy and Cookies Policy, You can contact Us:

By email: [hello@matter.industries](mailto:hello@matter.industries)

By visiting this page on our website: <https://matter.industries/contact>