Welcome to Dialectic Solutions and our website at www.dialectic-solutions.com (our “website”). At Dialectic Solutions, we are committed to protecting and respecting your privacy.

This privacy policy sets out the basis on which we will process any Personal Data that we may collect about you as a visitor to our website. This policy further sets out how we protect your privacy and your rights in respect of our use of your Personal Data.

**WHAT IS PERSONAL DATA?**

Personal Data is information that makes it possible to identify a natural person. This includes, in particular, your name, date of birth, address, telephone number, e-mail address, but also your IP address. Anonymous data exists if no personal reference to the user can be made.

**WHAT IS PROCESSING?**

"Processing" means and covers virtually any handling of data.

**WHAT LAW APPLIES?**

We will only use your Personal Data in accordance with the UK`s Data Protection Act (“DPA”) and the EU's General Data Protection Regulation (“GDPR”), and of course only as described in this Privacy Policy.

**WHO IS RESPONSIBLE FOR DATA PROCESSING?**

A “data controller” is a person or organisation who alone or jointly determines the purposes for which and the manner in which any personal data is, or is likely to be, processed. In this sense, Dialectic Solutions Ltd, PO Box 20356, Hamilton, ML3 3EP, Scotland (“Dialectic Solutions”, “we”, “us”, “our”) is the data controller. If you have any questions about this policy or about data protection at Dialectic Solutions in general, you can reach us by email using info@dialectic-solutions.com or call 0141 226 0217.

**WHAT ARE THE LEGAL BASES FOR PROCESSING PERSONAL DATA**

In accordance with the DPA and the GDPR, we have to have at least one of the following legal bases to process your Personal Data: a) you have given your consent; b) the data is necessary for the fulfilment of a contract/pre-contractual measures; c) the data is necessary for the fulfilment of a legal obligation; or d) the data is necessary to protect our legitimate interests, provided that your interests are not overridden.

**WHAT PERSONAL DATA DO WE COLLECT FROM YOU?**

We may collect and process the following Personal Data about you:

*a) Personal Data that you give us:*

This is information about you that you give to us by filling in forms on our website or correspond with us by telephone, post, email, or otherwise. It may include, for example, your name, address, email address, and telephone number; information about your business relationship with us; and information about your requirements and interests.

We also process the Personal Data involved in your use of our services (your contact information, such as your full name, email, postal address, and phone number, and the data related to your use of our services and the contract between us) in order to be able to provide our contractual services. This includes, in particular, our support, correspondence with you, invoicing, and fulfilment of our contractual, accounting, and tax obligations. Accordingly, the data is processed on the basis of your consent, fulfilling our contractual obligations and our legal obligations.

For optimal customer support, we use your first name, last name, email address, telephone number, and the data related to your contract with us and store it in our customer relationship management (“CRM”) provided by [Wix.com](https://www.wix.com/about/privacy) (Wix CRM) and supported by [Microsoft 365](https://privacy.microsoft.com/en-gb/privacystatement). This data processing is based on our legitimate interest in providing our customer service.

*b) Personal Data that our website and other systems collect about you:*

If you visit our website, it will automatically collect some information about you and your visit, including the Internet protocol (IP) address used to connect your device to the Internet and some other information, such as the pages on our site that you visit. This is used to monitor the performance of the website and improve the experience of visitors to the website.

*c) Cookies*

*Why do we have a cookie policy?*

In accordance with the UK’s Privacy and Electronic Communications Regulations (“PECR”) and the EU`s Privacy and Electronic Communications Directive (“PECD”), we need to inform you about the cookies we use and obtain your consent when using certain types of cookies, namely cookies that are non-essential for the website to function.

*What is a cookie?*

Cookies are text files containing small amounts of information which are downloaded to your device (e.g., computer, smartphone, electronic device which accesses the internet) when you visit a website. Cookies can be useful because they allow a website to recognise a user’s device and preferences and generally help to improve your online experience.

*What types of cookies do we use?*

Cookies can be divided into the following two broad categories:

*Necessary or essential cookies*. These cookies are essential or necessary to ensure that a website works properly and is secure so that you can navigate a website and use its features. Without these cookies, certain features of a website would not function, and thus you would not be able to use certain services.

*Optional cookies.* These cookies are non-essential for the website to function and require your consent. When it comes to optional cookies, the following distinctions are made:

* *Functional cookies*, sometimes called convenience cookies. These cookies allow a website to remember the options a user has made and other personalisation options you have selected when browsing.
* *Analysis and performance cookies,* which are used to monitor and improve the function and service of a website. Those can track down problems when using a website, facilitate online surveys, record visitor numbers, and provide analytics metrics.
* *Advertising cookies or targeting cookies.* They are used to deliver customised advertising to the user.

*Consent*

Necessary Cookies will always be active on your device, but we ask for your consent to place Functional*,* Analytics and Advertising Cookies and other similar technologies on your device. If at any time you want to change your cookie settings, including withdrawing your consent to this processing, we would encourage you to do this via our cookie consent tool or the links below. You may need to refresh the page before the changes to the settings take effect.

*The cookies we use*

*Google Analytics*

If you consent to, we use Google Analytics, a web analysis service of [Google](https://policies.google.com/privacy?hl=en-US). Google Analytics uses a specific form of cookie, which is stored on your device and enables an analysis of your use of our website. The cookies set by Google Analytics for measurement are different for each visitor (i.e., there is not a single Google Analytics cookie ID that is used on all sites using Google Analytics). The information about your use of our website generated by the cookie is generally transmitted to a Google server in the USA and stored there.

Google uses this information on our behalf to analyse your use of this website in order to compile reports on website activities and provide additional services related to website and internet use. The IP address transmitted by your browser in the context of Google Analytics is not merged with other data. In the configuration of Google Analytics, we ensured that Google receives this data as a processor and is therefore not allowed to use this data for its own purposes.

In relation to the data transfer into the USA Google’s processing agreement for Google Analytics, can be read [here](https://support.google.com/analytics/answer/3379636?hl=en). You can disable tracking by Google Analytics with future effect by downloading and installing the Google Analytics Opt-out Browser Add-on for your current web browser following this [link](http://tools.google.com/dlpage/gaoptout?hl=en).

*LinkedIn Insight Tag*

On our website, we use the LinkedIn Insight Tag for conversion tracking by [LinkedIn](https://www.linkedin.com/legal/privacy-policy). The Insight Tag places unique LinkedIn browser cookies (conversion cookie) in your browser to enable the collection of the following data for this cookie: Metadata such as IP address, timestamp, and page events (e.g., page visits). These cookies have limited validity. If you visit certain pages within our website and the cookie has not expired, both we and LinkedIn can recognise that you were directed to that page after clicking on the advertisement.

The LinkedIn Insight Tag allows LinkedIn to collect data on website visits, including URL, referrer URL, IP address, and device and browser features (user agent) as well as the time stamp. This data is transmitted to LinkedIn, the IP addresses are shortened or hashed (if they are used to reach members on different devices). The direct LinkedIn member identification numbers are removed within seven days in order to pseudonymised the data. The remaining pseudonymized data are then deleted by LinkedIn within 180 days.

LinkedIn does not share any personal data with us. It merely offers summary reports about the website’s target group and the performance of the advertisement. The information collected using the conversion cookie is used to compile conversion statistics. These inform us about the total number of users who click on one of our advertisements and who have been taken to a page with a conversion tracking tag. The retargeting function provided by LinkedIn helps us show visitors to our website target group-specific advertisements for our products and services outside of our website without being able to identify the user. The legal basis for the processing is your consent.

*Google Ads*

We use Google Ads, an online advertising service provided by Google. Google Ads enables us to show advertisements in the Google search engine or on third-party websites when the user enters certain search terms on Google (keyword targeting). Furthermore, targeted advertisements can be shown on the basis of user data available to Google (e.g. location data and interests) (target group targeting). With the help of Google Ads, we can evaluate this data quantitatively, for example, which search terms have led to the display of our advertisements and how many ads have resulted in corresponding clicks. The use of this service is based on your consent.

*Google Ads Remarketing*

We also use the remarketing functions of Google Ads. Google Ads Remarketing allows us to assign people who interact with our advertisements and website to specific target groups and to display interest-based advertising to them within the Google advertising network.

Further, the advertising target groups created by us using Google Ads Remarketing can be linked to Google's cross-device functions. This means that interest-based, personalised advertising (that is, advertising that has been adapted to you depending on your previous usage and surfing behaviour) can also be displayed on another of your end devices, e.g., a tablet or PC). The use of this service is based on your consent.

*Google Conversion Tracking*

We also use Google Conversion Tracking. With the help of Google conversion tracking, we and Google can recognise whether the user has performed certain actions. For example, we can evaluate which buttons on our website were clicked how often and which products were viewed or purchased particularly frequently. This information is used to create conversion statistics. We also learn the total number of users who clicked on our ads and what actions they took. We do not receive any information with which we can personally identify the user. Google itself uses cookies or comparable recognition technologies for identification. The use of this service is based on your consent.

*c) Other information:*

For business reasons, we analyse the data we have on web and server traffic patterns, website interactions, browsing behaviour, etc. The analyses serve us alone and are not disclosed externally and processed using anonymous analyses with summarised and/or anonymised values (“Aggregated Data”). Aggregated Data could be derived from your Personal Data but is not considered Personal Data in law as this data will not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this Privacy Policy. For this purpose we use Google Analytics from [Google. The](https://policies.google.com/privacy?hl=en-US) legal basis is our legitimate interest and your consent. For further information on our use of Google Analytics, please refer to our Cookie Policy above.

**DATA PROCESSING THROUGH THIRD-PARTY SERVICES**

We use the content or service offers of third-party providers on the basis of our legitimate interests in order to integrate their content and services ("Content") on our website. This always requires that the third-party providers of this Content are aware of the IP address of the user, as without the IP address they would not be able to send the content to their browser. The IP address is therefore necessary for the display of this content.

The following provides an overview of third-party providers and their content, together with links to their privacy policies, which contain further information on the processing of data and so-called opt-out measures, if any: a) Hosting: [Wix.com](https://www.wix.com/about/privacy); b) Content Management System: [Wix.com](https://www.wix.com/about/privacy); and c) Analytics: Google Analytics from [Google](https://policies.google.com/privacy?hl=en-US).

**HOW WILL WE USE YOUR PERSONAL DATA?**

We may collect, store, and use your Personal Data for the following purposes:

* to operate, manage, develop, and promote our business and, in particular, our relationship with you and related transactions, including, for example:
	+ marketing purposes (when we have either gathered prior opt-in consent and/or have a legitimate interest to send you communications which we believe to be relevant and of use to you);
	+ accounting and billing/payment purposes;
	+ to operate, administer, and improve our website and other aspects of the way in which we conduct our operations;
	+ to offer you our services;
	+ to provide you with services or information that you may have requested; and
	+ to keep you informed and updated on relevant topics or services you may be interested in.
* to protect our business from fraud, money laundering, breach of confidence, theft of proprietary materials, and other financial or business crimes;
* to comply with our legal and regulatory obligations, bring and defend legal claims and assert legal rights; and
* if the purpose is directly connected with an assigned purpose previously made known to you.

We will only process your Personal Data as necessary so that we can pursue the purposes described above and where we have a legal basis for such processing. Where our lawful basis for processing is that such processing is necessary to pursue our legitimate interests, we will only process your Personal Data where we have concluded that our processing does not prejudice you or your privacy in a way that would override our legitimate interest. In exceptional circumstances, we may also be required by law to disclose or otherwise process your Personal Data.

**DATA SHARING**

In certain cases, it is necessary to transmit the processed Personal Data in the course of data processing. In this respect, there are different recipient bodies and categories of recipients.

*a) Internal*

If necessary, we transfer your Personal Data within Dialectic Solutions. Access to your Personal Data is only granted to authorised employees who need access to the data due to their job, e.g., to provide our services or to contact you in case of queries.

*b) External bodies*

Personal Data is transferred to our service providers in the following instances:

* in the context of fulfilling our contract with you,
* to use marketing services and to advertise our services online,
* to communicate with you,
* to provide our website, and
* to state authorities and institutions as far as this is required or necessary.

*c) International transfers*

We may transfer your Personal Data to other companies as necessary for the purposes described in this Privacy Policy. In order to provide adequate protection for your Personal Data when it is transferred, we have contractual arrangements regarding such transfers. We take all reasonable technical and organisational measures to protect the Personal Data we transfer.

**HOW LONG DO WE KEEP YOUR PERSONAL DATA?**

We will delete your Personal Data when we no longer need such Personal Data, for instance where:

* it is no longer necessary for us to retain your Personal Data to fulfil the purposes for which we had collected it;
* we believe that your Personal Data that we hold is inaccurate; or
* in certain cases where you have informed us that you no longer consent to our processing of your Personal Data.

Sometimes, however, there are legal or regulatory requirements which may require us to retain your Personal Data for a specified period, and in such cases we will retain your Personal Data for such specified period; and we may need to retain your Personal Data for certain longer periods in relation to legal disputes, and in such cases we will retain it for such longer periods to the extent required.

**DATA SECURITY**

In order to protect the data stored with us in the best possible way against accidental or intentional manipulation, loss, destruction, or access by unauthorised persons, we use appropriate technical and organisational security measures. The security levels are continuously reviewed in cooperation with security experts and adapted to new security standards.

Nevertheless, internet-based data transmissions can always have security gaps, so that absolute protection cannot be guaranteed. And databases or data sets that include Personal Data may be breached inadvertently or through wrongful intrusion. Upon becoming aware of a data breach, we will notify all affected individuals whose Personal Data may have been compromised as expeditiously as possible after which the breach was discovered.

**YOUR RIGHTS AND PRIVILEGES**

1. *Privacy rights*

You can exercise the following rights under the DPA and the GDPR:

* *The right to access;*
* *The right to rectification;*
* *The right to erasure;*
* *The right to restrict processing;*
* *The right to object to processing;*
* *The right to data portability;*
1. *Updating your information and withdrawing your consent*

If you believe that the information we hold about you is inaccurate or request its rectification, deletion, or object to legitimate interest processing, please do so by contacting us.

1. *Access Request*

In the event you want to make a Data Subject Access Request, please contact us. We will respond to requests regarding access and correction as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days, we will tell you why and when we will be able to respond to your request. If we are unable to provide you with any Personal Data or to make a correction requested by you, we will tell you why.

1. *Complaint to a supervisory authority*

You have the right to complain about our processing of Personal Data to a supervisory authority responsible for data protection. The supervisory authority in Scotland is: The Information Commissioner’s Office – Scotland, Queen Elizabeth House, Sibbald Walk, Edinburgh, EH8 8FT, Telephone: 0303 123 1115 [www.ico.org.uk](http://www.ico.org.uk) However, we would appreciate the opportunity to address your concerns before you contact the ICO.

1. *What we do not do*
* We do not request Personal Data from minors and children;
* We do not process special category data without obtaining prior specific consent;
* We do not use automated decision-making, including profiling; and
* We do not sell your Personal Data.

**HELP AND COMPLAINTS**

If you have any questions about this policy or about data protection at Dialectic Solutions in general, you can reach us by email using info@dialectic-solutions.com or call 0141 226 0217.

**CHANGES**

The first version of this policy was issued on Friday 4th of October 2024, and is the current version. Any prior versions are invalid, and if we make changes to this policy, we will revise the effective date.