



PRIVACY POLICY.

This privacy policy applies between you, the User of this Website, and Utopi Ltd, the owner and provider of this Website. Utopi Ltd takes the privacy of your information very seriously. This privacy policy applies to our use of Data collected by us or provided by you in relation to your use of the Website.

Definitions and interpretation:

1. In this privacy policy, the following definitions are used:

Approved Subprocessors(s)	means Microsoft and their Azure hosting platform
Cookies	a small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in the clause below (Cookies);
Data	collectively all information that you submit to Utopi Ltd via the Website. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws;
Data Protection Laws	any applicable law relating to the processing of personal Data, including but not limited to the GDPR, and any national implementing and supplementary laws, regulations and secondary legislation;
GDPR	the UK General Data Protection Regulation;
Utopi Ltd, we or us	Utopi Ltd, a company incorporated in Scotland with registered number SC626120 whose registered office is at 163 Bath Street, Glasgow, G2 4SQ
UK and EU Cookie Law	the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011 & the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2018;
User or you	any third party that accesses the Website and is not either (i) employed by Utopi Ltd and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to Utopi Ltd and accessing the Website in connection with the provision of such services; and
Website	The website that you are currently using, www.utopi.co.uk , utopi-portal.com and any sub-domains of this site unless expressly excluded by their own terms and conditions.

2. In this privacy policy, unless the context requires a different interpretation:

- a. the singular includes the plural and vice versa;



- b. references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy;
- c. a reference to a person includes firms, companies, government entities, trusts and partnerships;
- d. "including" is understood to mean "including without limitation";
- e. reference to any statutory provision includes any modification or amendment of it;
- f. the headings and sub-headings do not form part of this privacy policy.

Scope of this privacy policy.

- 3. This privacy policy applies only to the actions of Utopi Ltd and Users with respect to this Website. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.
- 4. For purposes of the applicable Data Protection Laws, Utopi Ltd is the "data controller". This means that Utopi Ltd determines the purposes for which, and the manner in which, your Data is processed.

Data collected.

- 5. We may collect the following Data, which includes personal Data, from you:
 - a. identity data, such as name;
 - b. contact data, such as email addresses, post code and telephone numbers;
 - c. marketing and communications data, such as your preferences in receiving marketing from us and preferences
 - d. technical data, including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access the Website (automatically collected);
 - e. usage data, including information about how you interact with our Website (automatically collected)

in accordance with this privacy policy.

We also collect aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

How we collect Data.

- 6. We collect Data in the following ways:
 - a. data is given to us by you; and
 - b. data is collected automatically.



Data that is given to us by you.

7. Utopi Ltd will collect your Data in a number of ways, for example:
- a. when you contact us through the Website, by telephone, post, e-mail or through any other means;
 - b. when you elect to receive marketing communications from us;
 - c. when you use our services;
 - d. when users submit a 'contact' form.;

in each case, in accordance with this privacy policy.

Data that is collected automatically.

8. To the extent that you access the Website, we will collect your Data automatically, for example:
- a. we automatically collect some information about your visit to the Website. This information helps us to make improvements to Website content and navigation, and includes your IP address, the date, times and frequency with which you access the Website and the way you use and interact with its content.
 - b. we will collect your Data automatically via cookies, in line with the cookie settings on your browser. For more information about cookies, and how we use them on the Website, see the section below, headed "Cookies".

Our use of Data.

9. Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Website. Specifically, Data may be used by us for the following reasons:

- a. internal record keeping;
- b. improvement of our products / services;
- c. transmission by email of marketing materials that may be of interest to you;

in each case, in accordance with this privacy policy.

10. We will not sell your Data under any circumstances.

11. We may use your Data for the above purposes if we deem it necessary to do so for our legitimate interests. We have set out below, in a table format, a description of all the ways we plan to use the various categories of 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.

Purpose/Use	Type of data	Legal basis
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation

UTOPI

(b) Dealing with your requests, complaints and queries	(c) Marketing and Communications	(c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Usage (d) Marketing and Communications (e) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, customer relationships and experiences and to measure the effectiveness of our communications and marketing	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To send you relevant marketing communications and make personalised suggestions and recommendations to you about goods or services that may be of interest to you based on your Data	(a) Identity (b) Contact (c) Technical (d) Usage (e) Marketing and Communications	Necessary for our legitimate interests (to carry out direct marketing, develop our products/services and grow our business) OR Consent, having obtained your prior consent to receiving direct marketing communications (see section below, headed "Direct Marketing").

If you are not satisfied with this, you have the right to object in certain circumstances (see the section headed "Your rights" below).



12. For the delivery of direct marketing to you via e-mail, we may need your consent, whether via an opt-in or soft-opt-in:
- a. soft opt-in consent is a specific type of consent which applies when you have previously engaged with us (for example, you contact us to ask us for more details about a particular product/service, and we are marketing similar products/services). Under "soft opt-in" consent, you will be given the opportunity to opt-out of marketing in each e-mail.
 - b. for other types of e-marketing, we are required to obtain your explicit consent; that is, you need to take positive and affirmative action when consenting by, for example, checking a tick box that we'll provide.
 - c. if you are not satisfied with our approach to marketing, you have the right to withdraw consent at any time. To find out how to withdraw your consent, see the section headed "Your rights" below.
13. If you opt out of receiving marketing communications, you may still receive service-related communications that are essential for administrative or customer service purposes for example relating to updates to our Terms and Conditions or checking that your contact details are correct.

Who we share Data with.

12. We may share your Data with the following groups of people for the following reasons:
- a. our employees, agents and/or professional advisors - to obtain advice from our professional experts or to obtain a quote.;
- in each case, in accordance with this privacy policy.

Keeping Data secure.

13. We have put in place appropriate security measures to prevent your Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Data on our instructions and they are subject to a duty of confidentiality.
14. Technical and organisational measures include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your Data, please let us know immediately by contacting us via this e-mail address: hello@utopi.co.uk.

Data retention.

16. We will only retain your Data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.
17. To determine the appropriate retention period for Data, we consider the amount, nature and sensitivity of the Data, the potential risk of harm from unauthorised use or disclosure of your Data,



the purposes for which we process your Data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

18. In some circumstances we will anonymise your Data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Your rights.

18. You have the following rights in relation to your Data:

- a. Right to access - the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update or delete such information. If we provide you with access to the information we hold about you, we will not charge you for this, unless your request is "manifestly unfounded or excessive." Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.
- b. Right to correct - the right to have your Data rectified if it is inaccurate or incomplete.
- c. Right to erase - the right to request that we delete or remove your Data from our systems.
- d. Right to restrict our use of your Data - the right to "block" us from using your Data or limit the way in which we can use it.
- e. Right to data portability - the right to request that we move, copy or transfer your Data.
- f. Right to object - the right to object to our use of your Data including where we use it for our legitimate interests.

19. To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us via this e-mail address: hello@utopi.co.uk.

20. We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

21. If you are not satisfied with the way a complaint you make in relation to your Data is handled by us, you may be able to refer your complaint to the relevant data protection authority. For the UK, this is the Information Commissioner's Office (ICO). The ICO's contact details can be found on their website at <https://ico.org.uk/>.

22. It is important that the Data we hold about you is accurate and current. Please keep us informed if your Data changes during the period for which we hold it.

Links to other websites.

22. This Website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

Changes of business ownership and control.



23. Utopi Ltd may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of Utopi Ltd. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purposes for which it was originally supplied to us.

24. We may also disclose Data to a prospective purchaser of our business or any part of it.

25. In the above instances, we will take steps with the aim of ensuring your privacy is protected.

Cookies.

26. This Website may place and access certain Cookies on your computer. Utopi Ltd uses Cookies to improve your experience of using the Website and to improve our range of products and services. Utopi Ltd has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.

27. All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.

28. Before the Website places Cookies on your computer, you will be presented with a message bar requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling Utopi Ltd to provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended.

29. You can find a list of Cookies that we use in the Cookies Schedule.

30. You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies but this can be changed. For further details, please see the help menu in your internet browser. You can switch off Cookies at any time, however, you may lose any information that enables you to access the Website more quickly and efficiently.

31. You can choose to delete Cookies at any time; however, you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.

32. It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

33. For more information generally on cookies, including how to disable them, please refer to aboutcookies.org. You will also find details on how to delete cookies from your computer.

General.

35. You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.

36. If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.



37. Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.

38. This Agreement will be governed by and interpreted according to the law of Scotland. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the Scottish.

Changes to this privacy policy.

39. Utopi Ltd reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the privacy policy on your first use of the Website following the alterations. You may contact Utopi Ltd by email at hello@utopi.co.uk.

This privacy policy was updated on 19 March 2024.



Cookies.

Our website (www.utopi.co.uk) and service platform (utopi-portal.com) uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

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 agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. These essential cookies are always enabled because our website won't work properly without them. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services. You can switch off these cookies in your browser settings but you may then not be able to access all or parts of our website.
- **Analytical or performance cookies.** These 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.
- **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).
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

1. Cookies.

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

Necessary and Functional Cookies

SquareSpace - Utopi.co.uk			
Cookie Name	Purpose	Duration	More information

UTOPI

_dd_cookie_test	Tests if cookies are supported	Expires instantly	https://support.squarespace.com/hc/en-us/articles/360001264507-The-cookies-Squarespace-uses#toc-check-your-cookies
_dd_s	Tracks browser errors	4 hours	https://support.squarespace.com/hc/en-us/articles/360001264507-The-cookies-Squarespace-uses#toc-check-your-cookies
_dd_site_test	Tests if cookies are supported	Expires instantly	https://support.squarespace.com/hc/en-us/articles/360001264507-The-cookies-Squarespace-uses#toc-check-your-cookies
_grecaptcha	Helps reduce spam in Acuity Scheduling	No expiry	https://support.squarespace.com/hc/en-us/articles/360001264507-The-cookies-Squarespace-uses#toc-check-your-cookies
_ssid	Remembers devices for anti-fraud purposes	4 years	https://support.squarespace.com/hc/en-us/articles/360001264507-The-cookies-Squarespace-uses#toc-check-your-cookies
Crumb	Prevents cross-site request forgery (CSRF)	Session	https://support.squarespace.com/hc/en-us/articles/360001264507-The-cookies-Squarespace-uses#toc-check-your-cookies
RecentRedirect	Prevents redirect loops if a site has custom URL redirects. Redirect loops are bad for SEO.	30 minutes	https://support.squarespace.com/hc/en-us/articles/360001264507-The-cookies-Squarespace-uses#toc-check-your-cookies
squarespace-announcement-bar	Prevents the announcement bar from displaying if a visitor dismisses it	Persistent	https://support.squarespace.com/hc/en-us/articles/360001264507-The-cookies-Squarespace-uses#toc-check-your-cookies
squarespace-popup-overlay	Prevents the promotional pop-up from displaying	Persistent	https://support.squarespace.com/hc/en-us/articles/360001264507-The-cookies-Squarespace-uses#toc-check-your-cookies

UTOPI

	if a visitor dismisses it		
squarespace-video-player-options	Remembers video player selected preferences (volume, playback speed, and quality) for videos uploaded directly to Squarespace	Persistent	https://support.squarespace.com/hc/en-us/articles/360001264507-The-cookies-Squarespace-uses#toc-check-your-cookies
ss_cookieAllowed	Remembers if a visitor agreed to placing analytics cookies on their browser if a site is restricting the placement of cookies	30 days	https://support.squarespace.com/hc/en-us/articles/360001264507-The-cookies-Squarespace-uses#toc-check-your-cookies
ss_sd	Ensures that visitors on the Squarespace 5 platform remain authenticated during their sessions	Session	https://support.squarespace.com/hc/en-us/articles/360001264507-The-cookies-Squarespace-uses#toc-check-your-cookies
Test	Investigates if the browser supports cookies and prevents errors	Session	https://support.squarespace.com/hc/en-us/articles/360001264507-The-cookies-Squarespace-uses#toc-check-your-cookies
TZ	Enables a Acuity Scheduling client's appointments to display correctly based on their time zone preferences.	Persistent	https://support.squarespace.com/hc/en-us/articles/360001264507-The-cookies-Squarespace-uses#toc-check-your-cookies

Analytic or Performance Cookies

SquareSpace - Utopi.co.uk			
Cookie Name	Purpose	Duration	More information

UTOPI

ss_cid	Identifies unique visitors and tracks a visitor's sessions on a site	2 years	https://support.squarespace.com/hc/en-us/articles/360001264507-The-cookies-Squarespace-uses
ss_cpvisit	Identifies unique visitors and tracks a visitor's sessions on a site	2 years	https://support.squarespace.com/hc/en-us/articles/360001264507-The-cookies-Squarespace-uses
ss_cvisit	Identifies unique visitors and tracks a visitor's sessions on a site	30 minutes	https://support.squarespace.com/hc/en-us/articles/360001264507-The-cookies-Squarespace-uses
ss_cvr	Identifies unique visitors and tracks a visitor's sessions on a site	2 years	https://support.squarespace.com/hc/en-us/articles/360001264507-The-cookies-Squarespace-uses
ss_cvt	Identifies unique visitors and tracks a visitor's sessions on a site	30 minutes	https://support.squarespace.com/hc/en-us/articles/360001264507-The-cookies-Squarespace-uses
Zoho - Utopi.co.uk			
Cookie Name	Purpose	Duration	More information
zsltssn	To detect the pages visited in a particular session	90 days	https://www.zoho.com/sites/cookie-policy/
Zsstssn	To detect the pages visited in a particular session	90 days	https://www.zoho.com/sites/cookie-policy/
Google - Utopi.co.uk and Utopi-Portal.com			
Cookie Name	Purpose	Duration	More information
_ga	To distinguish users	2 years	[GA4] Cookie usage on websites - Analytics Help (google.com)

UTOPI

ga<container-id>	Used to persist session state	2 years	[GA4] Cookie usage on websites - Analytics Help (google.com)

Targeting Cookies

DealFront - Utopi.co.uk			
Cookie Name	Purpose	Duration	More information
_lfa_test_cookie_store	Stored only until we find out if cookies can be stored	1 second	https://www.dealfront.com/cookies-and-tracking/
_session_id _stn_session_id _sso_session_id	Used to keep you signed in to the Dealfront product	1 month	https://www.dealfront.com/cookies-and-tracking/
_ga	Used to distinguish visitors	2 years	https://www.dealfront.com/cookies-and-tracking/
_gid	Used to distinguish visitors	24 hours	https://www.dealfront.com/cookies-and-tracking/
_dc_gtm_ga	Used to throttle request rate to Google's (Tag Manager, Analytics) servers	1 minute	https://www.dealfront.com/cookies-and-tracking/
utm_campaign utm_source utm_medium	We use these cookies to store from where you came to our website originally	1 year	https://www.dealfront.com/cookies-and-tracking/

UTOPI

ajs_anonymous_id	Random generated id for anonymous visitors. Used to count different users.	1 year	https://www.dealfront.com/cookies-and-tracking/
ajs_group_id	Dealfront website id if you are logged in. This is used to group visits by different website users.	1 year	https://www.dealfront.com/cookies-and-tracking/
ajs_user_id	Your Dealfront user id if you are signed in as a user. This is used for usage analytics.	1 year	https://www.dealfront.com/cookies-and-tracking/
intercom-id-bidodql	This cookie is for the chat feature on our website and product. It helps to remember you between your visits and allows you to resume previous conversations.	20 years	https://www.dealfront.com/cookies-and-tracking/
intercom-lou-bidodql1	As above, but using your Dealfront ID. It helps our	1 year	https://www.dealfront.com/cookies-and-tracking/

UTOPI

	support staff to identify you		
lidc	LinkedIn routing cookie	1 day	https://www.dealfront.com/cookies-and-tracking/
bcookie bscookie	LinkedIn Ads browser ID	1 year	https://www.dealfront.com/cookies-and-tracking/
BizoID	LinkedIn Ads analytics	6 months	https://www.dealfront.com/cookies-and-tracking/
BizoUserMatchHistory	LinkedIn Ads analytics	6 months	https://www.dealfront.com/cookies-and-tracking/
UserMatchHistory	LinkedIn Ads analytics	6 months	https://www.dealfront.com/cookies-and-tracking/
fr	Facebook Advertising	3 months	https://www.facebook.com/policies/cookies/
test_cookie IDE	Google advertising	3 months	https://policies.google.com/technologies/types

2. Managing cookies.

We use a cookie banner to allow you to select what cookies you consent to us using on our website and the Utopi platform.

You can choose which analytical, functionality and targeting cookies we can set by clicking on the button(s):

Strictly necessary cookies ALWAYS ACTIVE

Analytical or performance cookies OFF

Functionality cookies OFF

Targeting cookies OFF

You can also choose to "Reject All" cookies in the cookie banner.

You can also configure your browser to opt out of certain cookies:

To opt out of being tracked by Google Analytics across all websites, visit <http://tools.google.com/dlpage/gaoptout>.]



To opt out of being tracked by SquareSpace across all websites, visit <https://support.squarespace.com/hc/en-us/articles/360001264507-The-cookies-Squarespace-uses>

However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.