

IPRESENT PRIVACY POLICY

Protecting your private information is our priority. This Privacy Policy applies to the website and services of iPresent and governs data collection and usage. For the purposes of this Privacy Policy, unless otherwise noted, all references to iPresent means iPresent Ltd (company registered number 08048599) of Delta House, 7 Oriol Court, Alton, Hampshire, GU34 2YT, United Kingdom

By using the iPresent website or services, you consent to the data practices described in this Privacy Policy. If you do not agree with any part of this Privacy Policy, then we cannot make our website or services available to you and you should stop accessing and using them.

iPresent encourages you to review the privacy statements of websites you choose to navigate to from iPresent so that you can understand how those websites collect, use and share your information. iPresent is not responsible for the privacy statements or other content on websites outside of the iPresent website.

This Privacy Policy is provided in accordance with iPresent's obligations under applicable privacy and data protection law, including Regulation (EU) 2016/679 (GDPR) (Applicable Data Protection Law). Definitions in this Privacy Policy shall be as set out in the Applicable Data Protection Law. For the purposes of this Privacy Policy, the term "personal data" means any information which identifies you or which allows you to be identified when combined with other information. It does not include data where the identity has been removed (anonymous data).

Depending on the circumstances, iPresent may be a data controller (for example, when collecting personal data from our clients to send them marketing information and collecting personal data from our staff and consultants) and a data processor (for example, when storing personal data collected by customers using data forms or personal data within resources uploaded by customers). This Privacy Policy primarily applies in the context where iPresent is a data controller.

Collection of your Personal Information

iPresent may collect and process personal data, such as your name and email address if you enter these on the contact form on our website or to fulfil our contractual obligations - to provide our services, invoice and receive payment for services, send legal updates, news and information about our services and related services. We may gather additional personal or non-personal information in the future.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender, and social media accounts.

Contact Data includes billing address, delivery address, email address and telephone numbers.

Financial Data includes bank account and payment card details.

Transaction Data includes details about payments to and from you and other details of services you have purchased from us.

Technical Data includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device model and other technology on the devices you use to access this website or our software.

Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.

Usage Data includes information about how you use our website and services.

Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **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. This information is used for the operation of the website and the services provided by iPresent, and to provide general statistics regarding use of the iPresent website and services.

In the course of providing our services we may collect Special Categories of Personal Data (such as details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) and information about criminal convictions and offences.

How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your name, email address and contact details in person, or by filling in forms on our website or by corresponding with us by post, phone, email, social media or otherwise. This includes personal data you provide when you:

- request our products or services
- meet with one of our employees or consultants;
- participate in an event which we have organised;
- complete a form on our website requesting us to contact you;
- subscribe to our publications or newsletter;
- request marketing to be sent to you;
- enter a competition, promotion or survey;
- submit an application for a role within iPresent; or
- make a complaint or give us some feedback.

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.

Automated technologies through the use of our website or services. In your use of our website or services (including receiving our newsletter), certain Usage Data is transmitted to us such as the device you are using, your IP address and other such data.

Third parties or publicly available sources. We may receive personal data about you from various third parties as set out below:

- Technical Data or Usage Data from analytics providers or search information providers.
- Employment, Identity and Contact Data from third party recruitment agencies.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying

to enter into with you (for example, to provide you with our services). In this case, we may have to cancel the services you have with us but we will notify you if this is the case at the time.

Purposes for which we will process your personal data

iPresent collects and uses your personal information to operate its website(s) and mobile applications and deliver the services you have requested. We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message (although we may also rely on legitimate interests). You have the right to withdraw consent to marketing at any time by contacting us.

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.

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 new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver services including: (a) Manage payments, fees and charges	(a) Identity (b) Contact (c) Financial	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)

(b) Collect and recover money owed to us	(d) Transaction (e) Marketing and Communications	
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 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 and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) 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, software products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated

		and relevant, to develop our business and to inform our marketing strategy).
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

iPresent may also use your personally identifiable information to inform you of other products or services available from iPresent and our partners. iPresent may also contact you via surveys to conduct research about your opinion of our website and services. iPresent does not sell, rent or lease or provide in any other way its customer lists to third parties.

iPresent may keep track of the websites and pages our users visit within iPresent and which services our users access. This data is used to deliver customised content within iPresent to customers whose behaviour indicates that they are interested in a particular subject area.

Change of purpose

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.

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.

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.

Transfer of Personal Data

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes

and only permit them to process your personal data for specified purposes and in accordance with our instructions and applicable law. You agree that iPresent may share data with trusted partners to help provide our services including to perform statistical analysis, send you email or postal mail, provide customer support, or securely store your data. All such third parties are required to maintain the confidentiality of your information. These trusted parties include the following: analytics providers (Google Analytics, Qlik), marketing services providers (Hubspot, Pipedrive), storage and email providers (Amazon Web Services), communication tools (O2, EE), information security providers, accounting, HR and payroll providers (Xero) and our staff including employees and consultants.

We may also transfer your personal data to third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

Whenever we transfer your personal data out of the EEA or UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

iPresent will disclose your personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to:

- (a) conform to the edicts of the law or comply with legal process served on iPresent or the site;
- (b) protect and defend the rights or property of iPresent; and,
- (c) act under exigent circumstances to protect the personal safety of users of iPresent, or the public.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data retention

iPresent will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. Data reviewed regularly for relevance. Any data deemed no-longer relevant is deleted. iPresent shall keep personal data uploaded by customers for at least sixty days from the date of closing a customer account. iPresent shall keep staff HR-related personal data of employees and consultants for at least seven years. iPresent shall keep emails of clients and prospective clients for as long as it has a legitimate interest to do so.

Use of Cookies

The iPresent website may use “cookies” to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you. Our website uses cookies and similar technologies 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 allows us to improve our website. 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, please see our Cookie Policy.

Children Under Thirteen

iPresent does not knowingly collect personally identifiable information from children under the age of thirteen. If you are under the age of thirteen, you must ask your parent or guardian for permission to use this website or our services.

Opt-Out & Unsubscribe

We respect your privacy and give you an opportunity to opt-out of receiving announcements of certain information. Users may opt-out of receiving any or all communications from iPresent by contacting us or selecting the “Unsubscribe” option on their email.

Your Legal Rights

You have the right to:

- **Request access to your personal data (commonly known as a "data subject access request").** This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.** You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-

readable format. 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 consent at any time where we are relying on consent to process your personal data.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may 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.

Changes to this Privacy Policy

iPresent will occasionally update this Privacy Policy to reflect company and customer feedback and any changes in data protection regulations. iPresent encourages you to periodically review this Privacy Policy to be informed of how iPresent is protecting your information.

Contact Information

iPresent welcomes your questions or comments regarding this Privacy Policy. If you believe that iPresent has not adhered to this Privacy Policy, please contact iPresent at:

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Effective as of 22 May 2018