

This is privacy notice of IMPACCT Ltd ('IMPACCT')

We respect your privacy and are determined to protect your personal data. The purpose of this privacy notice is to inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from). We'll also tell you about your privacy rights and how the data protection law protects you.

What is the purpose of this privacy notice?

This privacy notice aims to give you information on how we collect and process your personal data through your use of this website, including any data you may provide through this website when you request to schedule a call, complete our venue finding request form, subscribe to a mailing list or request information on any of our products or services.

This website is not intended for children and we do not knowingly collect data relating to children.

You must read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Data controller(s)

IMPACCT Ltd is the controller and responsible for your personal data. Our contact details are IMPACCT Ltd, 12 High Street, Stevenage, SG1 3EJ, UK. For all data matters contact our Data Protection Officer, IMPACCT Ltd, 12 High Street, Stevenage, SG1 3EJ, UK.

Third-party links outside of our control

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

When you leave our website, we encourage you to read the privacy notice of every website you visit.

The personal data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. You can find out more about personal data from the Information Commissioners Office.

We may collect, use, store and transfer different kinds of personal data about you such as your name, address, telephone number, e-mail address and professional information only when it is voluntarily submitted to us.



We do not collect any **Special Categories of Personal Data** about you (this includes details about your 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). Nor do we collect any information about criminal convictions and offences.

How we collect your personal data

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

- **Directly.** You may give us your name and contract information by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you
 - Request information on our products or services;
 - Submit a venue finding request
 - Subscribe to our service or publications;
 - Request marketing information to be sent to you.

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data within the scope of the following purposes:

- to improve our level of service
- to improve the content of our website
- to respond to your requests, queries and complaints
- for the purposes of maintaining our relationship with you if you are a customer, supplier or business partner

With whom we share your personal data

IMPACCT may share personal data about you were necessary to fulfil a legitimate business purpose or to comply with applicable legal requirements. IMPACCT may also share your information with selected third parties including:

- Business partners, suppliers and sub-contractors who provide services to IMPACCT or on its behalf; and
- Analytics and search engine providers that assist IMPACCT in the improvement and optimization of this site.
- In the event that IMPACCT sells or buys any business or assets, it may disclose your Personal Data to the prospective seller or buyer of such business or assets:
- If IMPACCT or substantially all of its assets are acquired by a third party, in which case Personal Data held by it may be one of the transferred assets; or
- If IMPACCT is under a duty to disclose or share your Personal Data in order to comply with any legal obligation, or in order to enforce or apply its Terms of Use and other agreements, or to protect the rights, property, or safety of IMPACCT, its customers, or others. This includes exchanging information with



other companies and organizations for the purposes of fraud protection and compliance risk management.

When IMPACCT entrusts a certain sub-contractor with the handling of Personal Data, IMPACCT will carefully check and select such sub-contractor and will exercise necessary and appropriate supervision over such sub-contractor in order to ensure the security control of the entrusted data.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by emailing <u>liz.johnson@impacct.co.uk</u> at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result or directly requesting information on our products or services or submitting a venue finding request.

Cookies

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.

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 our Data Protection Officer at IMPACCT Ltd, 12 High Street, Stevenage, SG1 3EJ, UK.

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.

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

We 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.

In some circumstances you can ask us to delete your data: see **Your legal rights** below for further information.

In some circumstances we may anonymise your personal 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 Legal Rights

Unless subject to an exemption under the data protection laws, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data;
- The right to request that we provide you with your personal data and where
 possible, to transmit that data directly to another data controller, (known as the
 right to data portability), where applicable i.e. where our processing is based on
 consent or is necessary for the performance of our contract with you or where
 we process your data by automated means;
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to our processing of personal data, where applicable i.e.
 where processing is based on our legitimate interests (or in performance of a
 task in the public interest/exercise of official authority); direct marketing or
 processing for the purposes of scientific/historical research and statistics).

If you wish to exercise any of the rights set out above, please contact: Data Protection Officer at IMPACCT Ltd, 12 High Street, Stevenage, SG1 3EJ, UK.



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.

Other Information – Google Analytics

Google Analytics

IMPACCT makes use of Google Analytics which is a web analytics tool that helps website owners understand how visitors engage with their website. Google Analytics customers can view a variety of reports about how visitors interact with their website so they can improve it. Google Analytics collects information anonymously. It reports website trends without identifying individual visitors.

Google Analytics Cookies

Like many services, Google Analytics uses first-party cookies to track visitor interactions. These cookies are used to store information, such as what time the current visit occurred, whether the visitor has been to the site before, and what site referred the visitor to the web page. Browsers do not share first-party cookies across domains.

Use of IP Address

Every computer and device connected to the Internet is assigned a unique number known as an Internet protocol (IP) address. Since these numbers are usually assigned in country-based blocks, an IP address can often be used to identify the country, state, and city from which a computer is connecting to the Internet. Google Analytics collects the IP address of website visitors in order to provide website owners a sense of where in the world their visitors come from. This method is known as IP geolocation. Google Analytics does not report the actual IP address information to Google Analytics customers. Additionally, using a method known as IP masking, website owners that use Google Analytics have the option to tell Google Analytics to only use a portion of the IP address, rather than the entire IP address, for geolocation. Whether or not website owners use Google Analytics, they have access to IP addresses for visitors to their sites.

Personal Data

Personal Data is information that personally identifies you, such as your name, email address or billing information, or other data which can be reasonably linked to such information. The Google Analytics Terms of Service, which all Analytics customers must adhere to, prohibits the tracking or collection of this information using Google Analytics or associating Personal Data with web analytics information.



Google's Use of Analytics Data

Website owners that use Google Analytics have control over what data they allow Google to use. They can decide if they want Google to use this data or not by using the Google Analytics Data Sharing Options. When these options allow, the data is used to improve Google products and services. Website owners can change these options at any time.

Browser Opt-out

To provide website visitors more choice on how their data is collected by Google Analytics, Google developed the Google Analytics Opt-out Browser Add-on. The add-on communicates with the Google Analytics JavaScript (ga.js) to indicate that information about the website visit should not be sent to Google Analytics. The Google Analytics Opt-out Browser Add-on does not prevent information from being sent to the website itself or to other web analytics services

Changes to this notice and your duty to inform us of changes

This version (V1.0) was created April 2020

Please keep us informed if your personal data changes during your relationship with us. It is important that the personal data we hold about you is accurate and current.

Queries, Requests or Concerns

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance contact our Data Protection Officer at IMPACCT Ltd, 12 High Street, Stevenage, SG1 3EJ. UK.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the <u>Information Commissioners Office</u> on 03031231113 or via email https://ico.org.uk/global/contact-us/email/ or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England, UK.