

IMMI respects your privacy and is committed to protecting your personal data. This privacy notice outlines how we look after your personal data when you visit our website (regardless of where you visit it from) and informs you of your privacy rights and how the law protects you.

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 make an enquiry or subscribe to our newsletter.

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

Data controller

IMMI is the controller and responsible for your personal data. If you have any questions about this privacy policy, please **contact us** using the details set out below.

Our full details are:

Data Protection Officer: Michelle Smith

Postal address: IMMI

Coopies Field

Coopies Lane

Morpeth

Northumberland

NE61 6JT

Email address: DPO@imminet.com

Telephone number: +44 1670 501961

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on these links or enabling these 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.

The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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, title or similar identifier.
- **Contact Data** includes email address and telephone numbers.
- **Technical Data** includes 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 and other technology on the devices you use to access this website.
- **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, products 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 and use **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. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. 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.

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 via this website.

Methods of data collection

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

Direct interactions

You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you;

- submit an enquiry via our website
- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us some feedback.

Cookies

As you interact with our website, you can be assured that we do not use Cookies.

Third parties or publicly available sources

We may receive personal data about you from various third parties and public sources as set out below:

- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
- Identity and Contact Data from publicly available sources.

Purposes for which we will 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 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.
- Where you give us your express consent to process your data in particular circumstances.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email.

Please **contact us** if you need details about the specific legal ground we are relying on.

Direct marketing

We provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

You will receive marketing communications from us if you have provided your explicit consent via an opt-in, have voluntarily entered your email address to subscribe to our newsletter, or you have previously purchased similar services from us and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time using the contact details outlined above.

Transferring Data

We do not transfer your personal data outside the European Economic Area.

How long will you use my personal data for?

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 unauthorized 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, we may anonymize 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

You have rights under the General Data Protection Regulation 2016 in relation to your personal data including;

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.

- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact David Gibson using the contact details set out above.

Individual access requests

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. Please complete the Personal Data Individual Access Request form, available at the beneath this policy. Return to the DPO: DPO@imminet.com.

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 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.

Complaints

We would appreciate it if you would raise any concerns to our Data Protection Officer Michelle Smith.

If the matter is not resolved to your satisfaction you have the right to raise a complaint at any time to the GDPR Supervisory Body in the applicable European country in which the IMMI plant is based: The Information Commissioner's Office (ICO) in the UK, Italian Data Protection Authority (Garante) or the Office of Personal Data Protection of the Slovak Republic.