

# PRIVACY POLICY OF INVENIO BUSINESS SOLUTIONS LIMITED

DATED: 21 Sept 2020

## INTRODUCTION

Welcome to the privacy policy of Invenio Business Solutions Limited (company number 05872094) of First Floor 125 Wharfedale Road, Winnersh Triangle, Wokingham, England, RG41 5RB (“**Invenio**”).

Invenio is the controller and responsible for this website [www.invenio-solutions.com](http://www.invenio-solutions.com) (the “**Site**”). Invenio is part of a group of companies which is made up of different legal entities, details of which can be found here: [Invenio Group organogram](#) (the “**Invenio Group**”). When you purchase a product or service from us you may provide your personal data to other companies within the Invenio Group, so when we mention “**we**”, “**us**” or “**our**” in this privacy policy, we are referring to the relevant company in the Invenio Group which will be the controller for your data and responsible for processing your data.

We respect your privacy and are committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our Site (regardless of where you visit it from) and use our products or services and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy [here](#). Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

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## 10. GLOSSARY

### 1 IMPORTANT INFORMATION AND WHO WE ARE

#### PURPOSE OF THIS PRIVACY POLICY

This privacy policy aims to give you information on how we collect and process your personal data through your use of our Site, products and services, including any data you may provide when you sign up to our newsletter or purchase a product or service from us.

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

It is important that you read this privacy policy together with any other privacy policy or fair processing policy 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 policy supplements other notices and privacy policies and is not intended to override them.

#### CONTACT DETAILS

We have appointed a data protection officer (“DPO”) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise [[Your legal rights section](#)], please contact the DPO using the details set out below:

Full name of legal entity: Invenio Business Solutions Limited

Name of DPO: Naveen Agarwal

Email address: [Naveen.agarwal@invenio-solutions.com](mailto:Naveen.agarwal@invenio-solutions.com)

Postal address: First Floor 125 Wharfedale Road, Winnersh Triangle, Wokingham, England, RG41 5RB

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

#### CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy policy under regular review. This version was last updated on the date set out at the top of this privacy policy. We may amend this privacy policy from time to time and if we do, we will post the updated version on our Site. We encourage you to check our

privacy policy every time you wish to use our Site, products and services to ensure you understand the terms that apply at that time. Historic versions can be obtained by contacting us.

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

### **THIRD-PARTY LINKS**

This Site may include links to third-party websites, plug-ins and applications (“**links**”). 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 links and are not responsible for their privacy statements. When you leave our Site, we encourage you to read the privacy policy of every link you click on.

## **2 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 name, username or similar identifier, date of birth and gender;
- Contact Data includes postal address, email address, telephone, mobile and fax numbers;
- Technical Data includes your login data, device, browser type, session duration, pages per session, bounce rate, traffic source, user behaviour, pages landed, pages exited, country of origin;
- Profile Data includes your username and password, purchases or orders made by you, your interests, feedback and survey responses;
- Usage Data includes information about how you use our Site, products and services; and
- 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 (“**Aggregated Data**”) for any purpose. 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. For example, we may aggregate your Usage Data to calculate the

percentage of users accessing a specific Site 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.

### **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.

### **3 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 Identity, Contact, Financial and Marketing and Communications Data by filling in forms or by corresponding with us by post, phone, email, via our Site or otherwise. This includes personal data you provide when you:
  - apply for our products or services;
  - create an account with us;
  - use our Site, products or services;
  - subscribe to our publications;
  - request marketing to be sent to you; or
  - give us feedback, leave a review, enter a survey or contact us.
- **Automated technologies or interactions.** As you interact with our Site and use our products or services, we will automatically collect Technical and Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our 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 Site may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy available on our Site.

- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
  - Technical Data from analytics providers, such as Google;
  - Identity and Contact Data from business directories.

#### 4 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 in the following circumstances:

- where you have Consented to the processing;
- for the Performance of a Contract we are about to enter or have entered 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; or
- where we need to Comply with a Legal Obligation.

Click here [Glossary, Lawful Basis](#) to find out more about the types of Lawful Basis that we will rely on to process your personal data.

#### PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

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.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To enable you to apply for our products or services and register you as a new client or vendor	(a) Identity (b) Contact	Performance of a Contract
To enable you to use our Site, products or services, subscribe to our publications,	(a) Identity (b) Contact (c) Marketing and	(a) Performance of a Contract (b) Necessary for our Legitimate Interests (to study how our clients

	Communications	and vendors use our Site, products or services, to develop them, and to grow our business)
To manage our relationship with you which will include, for example, notifying you about changes to our terms or privacy policy and asking you to give us feedback, leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a Contract (b) Necessary to Comply with a Legal Obligation (c) Necessary for our Legitimate Interests (to keep our records updated and to study how our clients and vendors use our Site, products or services)
To administer and protect our business and this Site (including troubleshooting, data analysis, testing, system maintenance, management, optimisation, 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 use data analytics to improve our Site, products or services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our Legitimate Interests (to define types of clients and vendors for our Site, products or services, to keep our Site 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 (f) Marketing and Communications	Necessary for our Legitimate Interests (to develop our Site, products or services and to grow our business)

## MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have therefore established the following personal data

control mechanisms:

## **PROMOTIONAL OFFERS FROM US**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have Consented to receiving that marketing.

## **THIRD-PARTY MARKETING**

We will get your Consent before we share your personal data with any third party 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.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product or service purchase, product or service experience or other transactions.

## **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.

## **5 DISCLOSURES OF YOUR PERSONAL DATA**

We may share your personal data with the parties set out below:

- third parties if we are under a duty to disclose or share it in order to comply with any legal obligation (for example auditors, insurers, professional advisers and HMRC);

- other companies in the Invenio Group acting as joint controllers or processors who may provide IT, system administration or other services or undertake leadership reporting;
- service providers acting as processors who may provide IT, payment processing, system administration and other services;
- business partners acting as joint controllers or processors who we may cooperate with to provide you with products or services; and
- 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.

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.

## **6 INTERNATIONAL TRANSFERS**

We share your personal data within the Invenio Group. This may involve transferring your data outside the European Economic Area (EEA).

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring adequate mechanisms are put in place to protect your personal data in accordance with European standards.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## **7 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.

Where we have given you (or where you have chosen) a user identification code, password or any other piece of information that enables you to access certain parts of our Site, products or services, you are responsible for keeping such information confidential. You must not disclose it to any third party.



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.

## 8 DATA RETENTION

### HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal 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 personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.

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, regulatory, tax, accounting or other requirements.

As a general rule, we will retain your personal data for the following periods of time unless we inform you otherwise:

<b>Circumstances in which personal data was provided</b>	<b>How long do we keep it?</b>
When you contact us via our Site or by any other means (e.g. email or telephone) which does not lead to a contractual relationship	Until you ask to be removed or as part of our periodic data cleanse (maximum period of 2 years)
When we receive your information from third parties or publicly available sources, when you are added to our marketing database or when you give us feedback, leave a review or enter a survey	Until you ask to be removed or as part of our periodic data cleanse (if applicable)
When you engage us to provide you with any products or services	7 years from termination or expiry of our contract with you / closure or your account

When we engage you to provide us with any products or services	7 years from termination or expiry of our contract with you / closure or our account
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In some circumstances you can ask us to delete your data: please see [Your legal rights section](#) below for further information.

In some circumstances we will 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.

## 9 YOUR LEGAL RIGHTS

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

- **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:
  - if you want us to establish the data's accuracy;
  - where our use of the data is unlawful, but you do not want us to erase it;
  - 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
  - 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 for the Performance of 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 services or products to you. We will advise you if this is the case at the time you withdraw your Consent.

If you wish to exercise any of the rights set out above, please contact our DPO as set out [Contract details section](#).

## **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 could 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 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.

## **10 GLOSSARY**

### **LAWFUL BASES**

Consent or Consented means you have signified your agreement by a statement or clear opt-in to processing for a specific purpose. Consent will only be valid if it is a freely given, specific, informed and unambiguous indication of what you want. You can withdraw your Consent at any time by contacting us.

Legitimate Interest(s) means the interest(s) of our business in conducting and managing our business to enable us to give you the best service or product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our Legitimate Interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our Legitimate Interests against any potential impact on you in respect of specific activities by contacting us.

Performance of a Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a Legal Obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

# INVENIO ORGANOGRAM

