



## Privacy notice

We ask that you read this privacy notice carefully as it contains important data on who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data and on how to contact us and supervisory authorities in the event that you have a complaint.

### Who we are

Intelligent Positioning Ltd is a company registered in England and Wales with number 6253300 whose registered office is at 2nd Floor, Chandos House, 26 North Street, Brighton, UK, BN1 1EB. In this privacy policy references to we, us and our, are to Intelligent Positioning Ltd.

In the course of various contracts which we have with companies to provide our services, we collect, use and are responsible for certain personal data. When we do so we are regulated under the General Data Protection Regulation (GDPR) which applies across the European Union and the United Kingdom as it is now enacted under the Data Protection Act 2018. We are responsible as 'controller' of that personal data for the purposes of those laws.

### The personal data we collect and use

In the course of providing services we may collect the following personal data when our customer provides it to us such as:

- Names of individuals
- Email addresses
- Contact telephone numbers in certain circumstances
- Depending on the account type, we may collect payment information in order to take payment for our services ○
- Any other personal data provided by our customers to us.
- We may also collect the following personal data about you from other sources such as websites, third party contacts and if they are an existing customer information from previous matters:
  - Name, email, phone number, birthday
  - Any existing customer information
  - Customer type, our segmentation and personas
  - Meeting and telephone notes
  - Dates of meetings and calls
  - What marketing campaigns they came from and who provided the lead etc
  - Work anniversaries

### Who we share personal data with

We routinely share personal data within the Intelligent Positioning group. We also routinely share personal data with our partners / third party suppliers. Please contact us for a list of our partners / third party suppliers.

Some of those partners / third party suppliers may be based outside the European Economic Area. For further information including on how we safeguard personal data when this occurs, see 'Transfer of data out of the EEA'.

We will share personal data with law enforcement or other authorities if required by applicable law.  
We will not share personal data with any other third party.

### How long personal data will be kept

We will keep personal data while the individual's company has an account with us or while we are providing services. Thereafter, we will keep personal data for as long as is necessary:

- to respond to any questions, complaints or claims made by our customer or on our customer's behalf; Pi Datametrics 1

- to show that we treated the individual and customer fairly;
- to keep records required by law.

We will not retain personal data for longer than necessary for the purposes set out in this policy. After six years from the termination of the contract, we will delete or anonymise any personal data from the file.

## Reasons we can collect and use personal data

Under data protection law, we can only use personal data if we have a lawful reason for doing so, eg:

- to Comply with our legal and regulatory obligations;
- For the performance of our contract or to take steps at the customer's request before entering into a contract; ○
- For our legitimate interests or those of a third party; or
- Consent has been given.

The table below explains what we use (process) personal data for and our reasons for doing so:

| What we use personal data for                                                                                                                           | Our reasons                                                                                                                                                                                                              |
|---------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To provide services to our customer                                                                                                                     | For the performance of our contract with our customer or to take steps at the customer's request before entering into a contract                                                                                         |
| Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies                                 | To comply with our legal and regulatory obligations                                                                                                                                                                      |
| Ensuring business policies are adhered to, eg policies covering security and internet use                                                               | For our legitimate interests or those of a third party                                                                                                                                                                   |
| Operational reasons, such as improving efficiency, training and quality control                                                                         | For our legitimate interests or those of a third party                                                                                                                                                                   |
| Statistical analysis to help us manage our practice, eg in relation to our financial performance, customer base, work type or other efficiency measures | For our legitimate interests or those of a third party                                                                                                                                                                   |
| Preventing unauthorised access and modifications to systems                                                                                             | For our legitimate interests or those of a third party To comply with our legal and regulatory obligations                                                                                                               |
| Updating and enhancing customer records                                                                                                                 | For the performance of our contract with you or to take steps at your request before entering into a contract To comply with our legal and regulatory obligations For our legitimate interests or those of a third party |
| To send marketing emails to you                                                                                                                         | consent has been given.                                                                                                                                                                                                  |

## Transfer of data out of the EEA

To deliver services, it is sometimes necessary for us to share your personal data outside the European Economic Area (EEA), eg:

- With our group companies;
- With your and our service providers located outside the eea;
- If you are based outside the eea;
- Where there is an international dimension to the matter in which we are advising you.

These transfers are subject to special rules under European and UK data protection law.

These non-EEA countries do not have the same data protection laws as the United Kingdom and EEA. We will, however, ensure the transfer complies with data protection law and all personal data will be secure.

If you would like further information please contact us (see 'How to contact us' below).

## Individuals' rights

Under the GDPR individuals have a number of important rights free of charge. In summary, those include rights to:

- Access to Their Personal Data and to Certain Other Supplementary Information That This Privacy Notice Is Already Designed to Address
- Require Us to Correct Any Mistakes in Their Personal Data Which We Hold
- Require the Erasure of Personal Data Concerning Them in Certain Situations
- Receive the Personal Data Concerning Them Which They Have Provided to Us, in a Structured Format and Have the Right to Transmit Those Data to a Third Party in Certain Situations
- Object at Any Time to Processing of Personal Data Concerning Them for Direct Marketing
- Object to Decisions Being Taken by Automated Means Which Produce Legal Effects Concerning Them or Similarly Significantly Affect Them
- Object in Certain Other Situations to Our Continued Processing of Their Personal Data
- Otherwise Restrict Our Processing of Their Personal Data in Certain Circumstances
- For Further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.

If you are an individual and would like to exercise any of those rights, please:

- Email, call or write to us
- Let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- Let us know the information to which your request relates.

## Keeping personal data secure

We have appropriate security measures in place to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to personal data to those who have a genuine business need to know it. Those processing data will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify the individual and any applicable regulator of a suspected data security breach where we are legally required to do so.

## How to complain

We hope that we can resolve any query or concern you raise about our use of your data. If you have any questions or concerns please contact us.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

## Changes to this privacy notice

This privacy notice was last updated on 15th August 2018.

We may change this privacy notice from time to time, when we do we will inform you.

## How to contact us

Please contact us if you have any questions about this privacy notice or the personal data we hold. If you wish to contact us please send an email to [support@pi-datametrics.com](mailto:support@pi-datametrics.com), write to Intelligent Positioning, 2nd Floor, Chandos House, 26 North Street, Brighton, BN1 1EB, or call 020 3371 3930.