

## PRIVACY POLICY

PLEASE READ THE TERMS OF THIS POLICY CAREFULLY BEFORE USING THE SITE

### 1. By using our site you accept these terms

Your access to and use of this website is subject to the terms of this policy, our Terms of Business and any other legal notices and statements contained on this website. By using this website, you agree to be subject to the following terms. If you do not agree to these terms, you must not use our site. We recommend that you print a copy of these terms for future reference.

### 2. Where to find terms that may apply to you

This Privacy Policy should be read with the following documents that will all apply to you. Click on the links below to go straight to more information on each area:

2.1. Our Website Terms of acceptable use

2.2. This Privacy Policy

2.3. Our Cookies Policy, which sets out information about the cookies on our site

2.4. Our Terms of Business

### 3. Why do we have a Privacy Policy?

ISOvA is committed to protecting and respecting your privacy and will comply with the obligations imposed on us by the applicable Data Protection legislation, including the UK Data Protection Act 2018, the General Data Protection Regulation ((EU) 2016/679) (GDPR) and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK and any successor legislation to the GDPR or the Data Protection Act 2018 (the **Data Protection Legislation**).

4. We shall use personal information provided by you in accordance with the provisions of our Terms of Business and in accordance with this policy.

5. Your use of this website constitutes acceptance of the terms of this policy.

6. Our Privacy Policy will be reviewed from time to time to take account of new laws and technology and any changes to our operational processes and any amendments to this policy will be incorporated in an updated version. Your subsequent use of the website constitutes acceptance of those changes. Any information we hold will be governed by our most recent Privacy Policy.

### 7. What Personal Information do we collect and how do we use it?

7.1. ISOvA needs to collect certain personal information to be able to offer its range of services to its clients.

7.2. We will collect and maintain most personal information from client use of this website or when you correspond with us by phone, e-mail or otherwise. This may be through filling in forms and registering to use our website and/or the client portal and through active use of the website and client portal.

ISOvA Limited

Registered in England and Wales with company number: 12916248

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8. The information we will collect includes (but is not limited to):
  - 8.1. information given when subscribing for or booking our services, posting material or enquiring about or requesting further services;
  - 8.2. information when you report a problem with our website;
  - 8.3. your name, address, telephone numbers, email addresses and other contact information, your job title, areas of the website used and visited, details of your or your organisation's service needs, and links to and from third party websites;
  - 8.4. information automatically collected when you use our website including:
    - 8.4.1. technical information, the internet protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
    - 8.4.2. information about your visit, including the full Uniform Resource Locators (URL's), clickstream to, through and from our site (including date and time), products and services you have viewed and searched for, page response times, download errors, lengths of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs), methods used to browse away from the page and any phone number used to call our customer service number.
  - 8.5. We may also need to collect and maintain information from external sources such as credit reference and identity verification agencies. We will notify you when we receive information from them and the purposes for which we intend to use that information.
  - 8.6. Periodically we may ask you to voluntarily complete surveys to provide us with information for our marketing or research purposes, although you do not have to respond to them.

## 9. How will we use your information?

- 9.1. ISOvA will use your information for the following purposes:
  - 9.1.1. to open and maintain your client account/s with us;
  - 9.1.2. to confirm your identity;
  - 9.1.3. to perform and administer the contract we enter into with you in accordance with our Terms of Business.
  - 9.1.4. to process payments from you and, where applicable, to you;
  - 9.1.5. to ensure that content from our website is presented in the most effective manner for you and for your computer;
  - 9.1.6. to provide you with information, products or services that you request from us or which we feel may be of interest to you, where you have consented to be contacted for such purposes;
  - 9.1.7. to audit the usage of our website including:
    - 9.1.7.1. to administer our website for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;

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- 9.1.7.2. to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- 9.1.7.3. to allow you to participate in interactive features of our service, when you choose to do so;
- 9.1.7.4. as part of our efforts to keep our site safe and secure;
- 9.1.7.5. to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- 9.1.7.6. to make suggestions and recommendations to you and other users of our site about products or services that may interest you or them;
- 9.1.7.7. to enable us to provide you with the services that you have requested from us and otherwise to perform our legal obligations to you;
- 9.1.7.8. to manage your client portal;
- 9.1.7.9. for training purposes, quality assurance or to record details about the services you order from us;
- 9.1.7.10. to satisfy and meet our legal and regulatory requirements;
- 9.1.7.11. to allow you to participate in interactive features of our services, when you choose to do so; and
- 9.1.7.12. to notify you about changes to our services.

9.2. If you have provided your explicit consent and unless and until you advise us to the contrary, we will also communicate with you about relevant information and opportunities relating to existing and new services which we consider suitable for you. **You have the right to withdraw your consent at any time (see paragraph 16) and, should you wish to do so, please contact [info@isova.co.uk](mailto:info@isova.co.uk). Withdrawing your consent is very likely to impact the services we can provide to you.**

## 10. Disclosure of Information

In the standard operation of our business, we may disclose your personal information to the following (who may be within or outside the European Economic Area):

- 10.1. to answer your enquiries, to perform and administer the contract we enter into with you in accordance with our Terms of Business and to process payments:
  - 10.1.1. our associated companies including any member of the ISOVA group of companies which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006;
  - 10.1.2. our third party service providers, sub-contractors, suppliers and professional advisors;
  - 10.1.3. credit agencies;
  - 10.1.4. successors in title to our business;
  - 10.1.5. any organisation or person expressly instructed by you;
  - 10.1.6. any relevant regulatory, governmental or law enforcement authority as required by law;
  - 10.1.7. third parties necessary to provide the services requested by you or necessary to protect the rights, property, or safety of our other clients, our employees, agents, consultants, sub-contractors or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction;

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- 10.1.8. advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users. We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example businesses in a certain location or a certain sector). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.
- 10.2. We will endeavour to ensure that any transfer outside the EEA is lawful and that appropriate security arrangements apply.
- 10.3. In order to transfer personal information to third parties in territories that do not yet retain adequate privacy laws, we will look to enter into agreements with the parties to whom we may there transfer your personal information ensuring appropriate and suitable safeguards that would be accepted as adequate within the European Community.
- 10.4. We require that organisations outside of our group of companies who handle or obtain personal information as service providers acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with the Data Protection Legislation and this policy.

## 11. Security of Information

- 11.1. We take the safeguarding of your data very seriously. All personal information in our possession is held securely. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.
- 11.2. All information you provide to us is stored on secure servers. Any payment transactions are encrypted (using SSL technology). In accordance with our Website Terms of Use, where we have given you (or where you have chosen) a username and password which enables you to access certain parts of our site, you are responsible for keeping this information confidential. We ask you not to share a password with anyone.
- 11.3. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from [info@isova.co.uk](mailto:info@isova.co.uk)
- 11.4. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## 12. Your duty to inform us of changes

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

## 13. Data Retention

- 13.1. We will only retain your personal information 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

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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. We will keep under regular review the length of time we need to retain personal data and have put in place internal procedures for this purpose.

- 13.2. In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a client of ISOvA we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

### 14. Your rights of access, correction, erasure, and restriction

14.1. Under certain circumstances, by law you have the right to:

- 14.1.1. Request **access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- 14.1.2. Request **correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- 14.1.3. Request **erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- 14.1.4. **Object** to processing of your personal information 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. You also have the right to object where we are improperly processing your personal information for direct marketing purposes.
- 14.1.5. Request the **restriction** of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- 14.1.6. Request the **transfer** of your personal information to another party.
- 14.1.7. If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact [info@isova.co.uk](mailto:info@isova.co.uk) in writing.

14.2. **No fee usually required**

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

### 15. 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 the information (or to exercise any of your other rights). This is another

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appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### 16. Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact [info@isova.co.uk](mailto:info@isova.co.uk). Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. Please note however that withdrawing your consent is very likely to impact the services we can provide to you.

### 17. Questions, Comments and Complaints

If you have any questions concerning our Privacy Policy, or you would like to change your personal information, or you would like to make a complaint concerning any action of ours which you consider is in breach of our policy please contact our Compliance Department directly. We have appointed a data privacy manager to oversee compliance with this Privacy Policy who can be contacted at [info@isova.co.uk](mailto:info@isova.co.uk)

We would hope to be able to deal with any complaint you may have to your satisfaction, but you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), at <https://ico.org.uk/>. The ICO is the UK supervisory authority for data protection issues. [Our ICO registration number is ZA525165].

### 18. How we collect your data during website use

Personal Information may be submitted on our website in two areas:

#### 18.1. Public Area

If you provide your name and address on the public area of our website in order to request information about our services, you may voluntarily provide additional personal information. You will be asked to provide your personal information in this area for the purposes of registering with us and opening an account with us.

#### 18.2. Private Area – the client portal

If you are already one of our clients, have opened an account with us and are using the client portal, you must use a password to enter our website. A “session cookie” is used to enable you to leave and re-enter our website without re-entering your password. Our web server will record the pages you visit within our website. To ensure a good quality of service we may monitor and record any communication you have with us whether in writing, by phone or by electronic mail. E-mail is not encrypted to/from either the public or private areas of this website.