Insolvency Practitioners Direct Limited ("ipd")

Marketing, Website and Cookie Privacy Policy

This policy is valid from 8 May 2018, although some aspects may not come into force until 25 May 2018.

At ipd, we are committed to maintaining the trust and confidence of our visitors to our web site. We want you to know that we do not sell, rent or trade email lists with any other businesses or organisations. This Privacy Policy explains how we treat data that we collect from visitors to our website, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

Visitors to the Website

When someone visits www.ipd-uk.com we use Google Analytics, a third-party service that collects standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

Emailing Lists

As part of the registration process for our e-newsletter and technical publications, we collect personal information. We use that information for various reasons:

- to tell you about areas of interest you've asked us to tell you about;
- to tell you about other areas of interest that we feel are related to subjects you have asked about;
- to contact you if we need to obtain or provide additional information;
- · to check our records are right; and
- to check every now and then that you're happy and satisfied.

We don't rent or trade email lists with other organisations and businesses.

We use a third-party provider, MailChimp, to deliver our newsletter and other email campaigns. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter and technical publications. For more information, please see <u>MailChimp's Privacy Notice</u>.

You can unsubscribe to general mailings at any time of the day or night by clicking the unsubscribe link at the bottom of any of our marketing emails or by emailing our data processing officer Martin Williamson at mw@ipd-uk.com.

We reserve the right to change third party providers for the purposes of delivering our newsletter, technical publications and other email campaigns. If we do change provider, we will amend this Privacy Policy to include their details.

How we use and protect your data for marketing purposes

We manage your customer data using a cloud-based customer relationship management system called Capsule. We use this to manage and generate email lists which is directly integrated with Mailchimp. When you register for our email newsletter, or consent to our use of your personal information, your data is securely transmitted to Capsule. All data held within Capsule is securely stored with Amazon Web Services (AWS) in the United States. Capsule has an agreement with AWS that ensures safe data transfer in accordance with EU data protection laws. More information can be found here: https://capsulecrm.com/support/eu-data-protection/

All data entered into the website is fully encrypted.

We will only disclose your information where we have a legal right or duty to do so (for example in relation to an investigation by a public authority or in a legal dispute).

How long do we keep your data?

We will not retain your data for longer than necessary for the purposes set out in this Policy. We will normally hold any personal data on a rolling 6-year basis.

Your Rights

Unless subject to an exemption under the GDPR, 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, subject to any fee specified by law;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date free of charge;
- 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 the 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 the processing is based on consent or is necessary for the performance of a
 contract with the data subject and where the data controller processes the 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 the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

Further details on your personal rights in respect of your data can be obtained at https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/

Cookies

What is a cookie?

Cookies are text files containing small amounts of information which are downloaded to your personal computer, mobile or other device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. Cookies are useful because they allow a website to recognise a user's device.

How long are cookies stored for?

Persistent cookies - these cookies remain on a user's device for the period of time specified in the cookie. They are activated each time that the user visits the website that created that particular cookie.

Session cookies - these cookies allow website operators to link the actions of a user during a browser session. A browser session starts when a user opens the browser window and finishes when they close the browser window. Session cookies are created temporarily. Once you close the browser, all session cookies are deleted.

Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improve the user experience.

You can find more information about cookies at www.allaboutcookies.org and www.youronlinechoices.eu.

Cookies used on the Website

A list of all the cookies used on the Website by category is set out below.

Strictly necessary cookies - These cookies enable services you have specifically asked for. These cookies are essential in order to enable you to move around the Website and use its features, such as accessing secure areas of the Website.

Performance cookies - These cookies collect anonymous information on the pages visited. By using the Website, you agree that we can place these types of cookies on your device.

These cookies collect information about how visitors use the Website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how the Website works.

Functionality cookies - These cookies remember choices you make to improve your experience. By using the Website, you agree that we can place these types of cookies on your device.

These cookies allow the Website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as watching a video or commenting on a blog. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

If you require any further information, please contact our data protection officer Martin Williamson at mw@ipd-uk.com.