

# Impero Privacy Policy

## Introduction

Impero operates various websites (“Websites”), and provides software and related services, cloud-based services, as well as hosting services for its software (collectively the “Services”). We respect your privacy and are committed to protecting your personal data.

Impero is made up of different legal entities, including Impero Solutions Limited, Impero Holdings Limited, Impero Solutions LLC and Safeguarding Monitor Limited. This Privacy Policy is issued on behalf of the Impero Group so when we mention "Impero", "we", "us" or "our" in this Privacy Policy, we are referring to the relevant company in the Impero Group responsible for processing your data. We will let you know which entity will be the controller for your data when you purchase a Service with us. Impero Solutions Limited is the parent company and responsible for the Websites.

This Privacy Policy tells you the types of information we collect about you when use our Websites, use our Services or which we otherwise obtain directly from you or from a third party, how we use that information, and the instances in which we share your information. This Privacy Policy may change from time to time so please check this policy regularly.

The Websites and our Services are not intended for use by children and, whilst our clients may ask us to process data relating to children on their behalf in relation to their use of our Services, we do not knowingly collect data relating to children for our own purposes.

For the purposes of this Privacy Policy, the term “personal data” means any information which identifies you or which allows you to be identified when combined with other information.

## 1. Important information and who we are

### Controller

We are the controller and responsible for your personal data in the circumstances set out below.

Please note that where your personal data is uploaded onto our systems by a client organisation in relation their use of our Services, they are the controller and responsible for that personal data and you should consult them for details of how they will process your personal data. This Privacy Policy does not cover processing by us of such personal data.

We have appointed a Data Protection Officer 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, please contact the data privacy manager using the details set out below.

### Contact details

Full name of legal entity: Impero Solutions Limited

Data Protection Officer: Nick Broadhurst

Email address: [dpo@imperosoftware.com](mailto:dpo@imperosoftware.com)

Postal address: Impero Software, Oak House, Mere Way, Ruddington Fields Business Park, Ruddington, Nottingham, NG11 6JS

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**

This version was last updated on 1 March 2021.

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**

Our website and Services may include links to third-party websites, plug-ins and applications. 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 websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## **2. The data we collect about you**

In connection with the provision of our website and/or our Services, 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, middle name, last name, username or similar identifier and title.
- **Contact Data** includes address, email address and telephone numbers.
- **Technical and Usage Data** includes information about how you access and use the website and our Services such as your 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 our website and Services, the pages you have visited and the links you have followed on them.
- **Profile Data** includes your username and password, your job title, your employer, preferences, feedback and survey responses.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We also collect, use and share **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 Technical and 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.

## **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 and Profile Data when completing forms on our Websites, or by corresponding with us by post, phone, email, social media, in person or otherwise. This includes personal data you provide when you:
  - register to use our Services;
  - complete a form on our Websites requesting us to contact you;
  - request support services in relation to our products and Services;
  - request marketing material to be sent to you;
  - provide your details at an event or exhibition;
  - complete a survey; or
  - make a complaint, request or give us some feedback.
- **Automated technologies or interactions.** As you interact with our Websites and Services, we may automatically collect Technical and Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.
- **Third parties.** We may receive Technical and Usage Data from third party analytics providers.

#### 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 it is necessary for our legitimate interests (or those of a third party) and we have assessed that your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data. You have the right to opt out of receiving marketing at any time by [contacting us](#).

#### 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.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new user of our products and/or Services and to provide our products and/or Services to you	(a) Identity (b) Contact (c) Profile	Necessary for our legitimate interests (to be able to provide our Services to you, to provide specific features of our service to you, to improve and customise our service)
To manage our relationship with you which will includes:  (a) Dealing with your enquiries, support requests and complaints;  (b) Notifying you about changes to this Privacy Policy;  (c) Asking you to leave a review or take a survey.	(a) Identity (b) Contact  (d) Profile (e) Marketing and Communications	(a) Necessary for our legitimate interests (to manage our user relationships and be able to provide and improve our Websites, products and Services)  (b) Necessary to comply with a legal obligation
To administer and protect our Websites and Services (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical and Usage	(a) Necessary for our legitimate interests (for running our Websites and Services, 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 Websites, products, Services, relationships with users and user experiences	(a) Technical and Usage	Necessary for our legitimate interests (to define types of users of our Websites, products and Services, to keep our Websites, products and Services updated and relevant, to develop our Websites, products and Services)
To make suggestions and recommendations to you about our products, services, information and events that may be of interest to you	(a) Identity (b) Contact (c) Technical and Usage (d) Profile (e) Marketing and Communications	Necessary for our legitimate interests (to develop our Websites, products and Services)

To enable you to complete a survey	(a) Identity (b) Contact (c) Profile	Necessary for our legitimate interests (to study how users use our products and services and to develop them)
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## Marketing

You will receive marketing communications from us if you have requested information from us or we otherwise feel it is in our legitimate interests to send it to you and you have not opted out of receiving that marketing.

## 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.

## Cookies

We use cookies and similar technologies to distinguish you from other users of our Websites. This helps us to provide you with a good experience when you use our Websites and allows us to improve our Websites.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

The types of cookies we use on our Websites are:

- **Strictly Necessary Cookies.** We use Strictly Necessary Cookies to operate our Services and Websites. These cookies are essential to enable you to move around our Services and Websites, use their features and to log into secure areas of the Services or Websites.
- **Functionality Cookies.** We use Functionality Cookies to recognise you when you return to our Services[ andWebsites]. This enables us to personalise our content for you, greet you by name and remember your preferences and various settings on our Services[ and Websites].
- **Analytical/Performance Cookies.** These cookies collect information about how many people are using our Services[ and Websites] and how they are moving around them when they are using them. This helps us to improve the way our Services [and Websites] work, for example, by ensuring that users are finding what they are looking for easily.

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 our Services and Websites may become inaccessible or not function properly.

Please see our cookie policy (available at <https://www.imperosoftware.com/uk/privacy/>) if you want further information on the specific cookies used by us.

## 5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above:

- Our third party service providers who perform functions on our behalf in connection with the operation of our business such as IT service providers and system administrators, third parties who host and manage data, deliver our products and services.
- Professional advisers including lawyers, bankers, auditors and who provide consultancy, banking, legal, insurance and accounting services.
- Our third party analytics partners to analyse Website traffic and understand user needs and trends.
- Third parties if we are required to do so by law, or if we believe that such action is necessary to: (a) fulfil a government, or regulatory authority request; (b) conform with the requirements of the law or legal process; (c) protect or defend our legal rights or property, Websites, Services or customers.
- 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

Our third party service providers may be based 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 at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries ([https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en)).
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.
- 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.

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 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 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.

You can request details of retention periods for different aspects of your personal data by [contacting us](#).

In some circumstances you can ask us to delete your data: see below for further information.

In some circumstances we may 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

You have the right to:

**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 (other than in the case of direct marketing).

**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: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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 (d) 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 to perform 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 products or services 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 us](#).

### **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 may 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 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.