

# Privacy Policy

## 1. Introduction

1.1. We are committed to safeguarding the privacy of our website visitors and service users.

1.2. This privacy policy applies where we are acting as a data controller with respect to the personal data of our website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.

1.3. By using our website and agreeing to this privacy policy, you consent to our use of cookies in accordance with the terms of this policy.

1.4. In this policy, “we”, “us” and “our” refer to Identify Direct Limited.

## 2. How we use your personal data

2.1. In this Section 2 we have set out:

- a. the general categories of personal data that we may process;
- b. in the case of personal data that we did not obtain directly from you, the source and specific categories of that data
- c. the purposes for which we may process personal data; and
- d. the legal bases of the processing.

2.2. We may process data about your use of our website and services (“usage data”). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.

2.3. We may process information contained in any enquiry you submit to us regarding goods and/or services (“enquiry data”). The enquiry data may be processed for the purposes of offering, marketing and selling relevant goods and/or services to you. The legal basis for this

processing is consent.

2.4. We may process information that you provide to us for the purpose of subscribing to our email notifications and newsletters (“notification data”). The notification data may be processed for the purposes of sending you the relevant notifications and newsletters. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

2.5. In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

2.6. Please do not supply any other person’s personal data to us, unless we prompt you to do so. Another person’s personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

### **3. Retaining and deleting personal data**

3.1. This Section 3 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

3.2. Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

3.3. Notwithstanding the other provisions of this Section 3, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

### **4. Providing your personal data to others**

4.1. We may disclose your personal data to our insurers, business service providers, and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the

establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

4.2. We may disclose personal data to our suppliers or subcontractors for the processing of our legitimate interests, namely the proper administration of our website and business.

4.3. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds.

4.4. We may disclose your enquiry data to one or more of those selected third party suppliers of goods and services identified on our website for the purpose of enabling them to contact you so that they can offer, market and sell to you relevant goods and/or services. Each such third party will act as a data controller in relation to the enquiry data that we supply to it; and upon contacting you, each such third party will, on request, supply to you a copy of its own privacy policy, which will govern that third party's use of your personal data.

## **5. Amendments**

5.1. We may update this policy from time to time by publishing a new version on our website.

## **6. Your rights**

6.1. You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to: the supply of appropriate evidence of your identity (for this purpose, Identify Direct Ltd will accept a certified photocopy of your passport.). This must be done by submitting a Subject Access Request using the contact details provided in Section 9.

6.2. We may withhold personal information that you request to the extent permitted by law.

6.3. You may instruct us at any time not to process your personal information for marketing purposes.

## **7. About cookies**

7.1. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

7.2. Cookies may be either “persistent” cookies or “session” cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

7.3. Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

## **8. Cookies used by our service providers**

8.1. Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

8.2. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google’s privacy policy is available at: <https://www.google.com/policies/privacy/>.

8.3. Facebook Ads conversion tracking is an analytics service provided by Facebook Inc. that connects data from the Facebook advertising network with actions performed on this Application. In order to understand Facebook’s use of Data, consult Facebook’s data policy. One of the ways Audience Network shows ads is by using the User’s ad preferences. The User can control this in using Facebook Ad Preferences.

## **9. Our details**

9.1. This website is owned and operated by Identify Direct Ltd.

9.2. We are registered in England and Wales under registration number 3689350 and our registered office is at The Old Stables, Blackdown Mill, Kenilworth Road, Leamington Spa CV32 6QT

9.3. Our principal place of business is at The Old Stables, Blackdown Mill, Kenilworth Road, Leamington Spa CV32 6QT

9.4. You can contact us:

- (a) by post, to the postal address given above; or
- (b) by telephone, on the contact number published on our website; or
- (c) by email, [admin@identifydirect.com](mailto:admin@identifydirect.com).