

Invyte – Privacy Policy

Privacy and Cookie Policy

Welcome to the Invyte privacy and cookies policy ('Policy'). Invyte respects your privacy and is committed to protecting your personal data. This Policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from), interact with our social media accounts or use any of our services including online services ('Sites') as well as where we interact in the course of our business and tell you about your privacy rights and how the law protects you.

We will never sell your personal data to a third party.

This Policy is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this Policy.

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1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS POLICY

This Policy aims to give you information on how Invyte collects and processes your personal data, through your use of our Sites, including any data you may provide when you contact us, use a product or service, register interest in or attend or participate in any events we organise or manage, or when you sign up to our newsletter or contact us in any other way.

Our Sites are not intended for children and we do not knowingly collect data relating to children.

It is important that you read this Policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Policy supplements the other notices and is not intended to override them.

CONTROLLER

Invyte is the controller and responsible for our Sites and for your personal data (collectively referred to as “Invyte”, “we”, “us” or “our” in this Policy).

We have appointed a Data Privacy Manager who is responsible for overseeing questions in relation to this Policy. If you have any questions about this Policy, including any requests to exercise *your legal rights*, please contact the Data Privacy Manager using the details set out below.

CONTACT DETAILS

Our full details are: Invyte Partners Limited.

To contact our Data Privacy Manager please email theteam@invyte.co.uk

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). 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 POLICY AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated in November 2019 and may be subject to further revisions.

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 Sites 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 notice of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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, last name, maiden name, username or similar identifier, title or employee reference, photos or other images.
- **Contact Data** includes: address, email address and telephone numbers, and any social media accounts used to contact us or used via our Sites.
- **Financial data** includes bank account and payment card details.
- **Transaction data** includes details about payments to and from you and other details of products and services purchased from us.
- **Technical Data** includes: device ID, 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 Sites.
- **Profile Data** includes: any username and password, purchases or orders made by you, or events attended or in which you participate, your interests, preferences, feedback and survey responses.

- **Usage Data** includes: information about how you use our Sites.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not knowingly collect any Special Categories of Personal Data (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). We may however be provided with Special Category Personal Data under a contract we have with a customer or provider, but we will only receive and process this where you will have given your express consent to sharing it in advance.

We may however 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.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract (i.e. App user licence) we have with you, or we have legitimate interest in collecting because of a service offered, and you fail to provide that data when requested, we may not be able to perform the contract or service we have or are trying to enter into with you. In this case, we may have to cancel a registration or service you have with us but we will endeavour to notify you if this is the case at the time.

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, Profile, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email, social media or otherwise. This includes personal data you provide when you:
 - make an enquiry about our services;
 - subscribe to or use our Sites;
 - request marketing to be sent to you;
 - register your interest in, attend or participate in an event we manage or organise
 - enter a competition, promotion or survey; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our Sites, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our *Cookie Policy* for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Technical or Contact Data from the following parties:
 - (a) analytics providers, such as Google Analytics or social media providers based in the UK, EU/ EEA or US;
 - (b) advertising networks; and
 - (c) search information providers
 - Identity and Contact Data from clients of ours, to which you are associated, or publicly available sources such as Companies House and the Electoral Register based inside the EU.
 - Identity and Contact Data provided at events such as business cards or attendee or participant lists.
 - Identity and Contact Data from data brokers or aggregators based inside the UK or EU/EEA.

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 we need to perform a contract we are about to enter into or have entered into with you or one of our customers or providers.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- We rely on consent as one of the legal bases for processing your personal data where you have expressly given it. In relation to sending third party direct marketing communications to you via email or text message we will only rely on consent. You have the right to withdraw consent to marketing at any time by contacting us.

[Click here](#) to find out more about the types of lawful basis that we will rely on to process your personal data.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of 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. Please *Contact us* if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer or user of our Sites or you attend an event managed or organised by us.	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you or with a customer or a provider
To process and deliver a service or order, including: (a) Pass your details to a permitted and authorised provider or professional (i.e. event venue or accommodation) (b) To inform you of developments or updates in relation to the services we provide to you (including our Sites) or provided by a permitted and authorised provider or professional (c) Connect you to a third party	(a) Identity (b) Contact (c) Profile (d) Financial (e) Transaction (f) Marketing and Communications	(a) Performance of a contract with you or with a customer or a provider (b) Necessary for our legitimate interests (i.e. to keep our records updated, to study how customers use our services and Sites and to comply with our legal and tax obligations)

<p>administrative or technology provider in order to perform our services</p> <p>(d) Manage payments, fees and charges</p> <p>(e) Collect and recover money owed to us</p>		
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) If you have some other form of contractual relationship with us</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p> <p>(e) Special Category</p>	<p>(a) Performance of a contract with you or with a customer or provider</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (i.e. to keep our records updated, to study how customers use our services and Sites and to comply with our legal and tax obligations)</p>
<p>To engage with you via our Sites or at an event managed or organised by us or to enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you or with a customer or provider</p> <p>(b) Necessary for our legitimate interests (i.e. to keep our records updated, to study how customers use our services and Sites and to comply with our legal and tax obligations)</p>
<p>To administer and protect our business and Sites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant content to you and measure or understand the effectiveness of the content we serve to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>	<p>Necessary for our legitimate interests (i.e. to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>

To use our database and data analytics to improve our Sites, services, marketing, customer relationships and experiences	(a) Technical (b) Usage (c) Contact (d) Identity (e) Marketing and Communications (f) Profile	Necessary for our legitimate interests (i.e. to define types of customers for our products and services, to keep our Sites updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about services that are similar to those already provided or which you have previously taken and which may be of interest (including our email newsletter and social media marketing)	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	(a) Necessary for our legitimate interests (i.e. to develop our services and grow our business) (b) Consent

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing. We have also established the following personal data control mechanisms:

Promotions from us

We may use your Identity, Contact, Technical, Usage, Profile, Marketing and Communication Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us where you have opted to do so or where you have requested information from us or purchased services from us or if you provided us with your details when you entered a competition and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside Invyte for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out or unsubscribe links on any marketing message sent to you or by contacting us at any time.

We will need to maintain a restricted record of Contact and Identity Data where you have opted out of receiving marketing and this is to prevent any future marketing being carried out and, unless otherwise informed, no other processing shall be carried out in relation to this information.

Cookies

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 this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookies policy at the end of this privacy notice.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at theteam@invyte.co.uk.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent in compliance with the above rules, where this is required or permitted by law.

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.

- Internal Third Parties as set out in the *Glossary* or elsewhere in this Policy.
- External Third Parties as set out in the *Glossary* or elsewhere in this Policy.
- Specific third parties listed in the *Glossary* or elsewhere in this Policy.
- 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 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

In order to perform our services and deliver our Sites we may be required to transfer your personal data outside the UK, to the EU or European Economic Area (**EEA**) or US, for example.

Whenever we transfer your personal data out of the UK or EU/EEA, we seek to 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 third parties that have signed our own Data Processing Agreement to safeguard and secure your personal data, or which are located in countries deemed to provide an adequate level of protection by the European Commission.
- Where we use international service providers, we are invariably bound by their own Data Processing Agreements, usually in a form approved by the European Commission, and which give personal data the same protection it has in Europe.
- Where we use service 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 UK, EU/EEA and the US.

Please *contact us* if you want further information on the specific mechanism used by us when transferring your personal data out of the UK or EU/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.

We seek to use third party technology providers that are ISO27001 certified or equivalent (SOC II) where practical.

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.

By law we have to keep basic information about our customers and employees (including Contact, Identity and any financial data) for six years after they cease being customers or employees for tax and legal liability purpose, but we also keep this information to make it easier for users to process new, follow-on or repeat service requests. Where we rely on consent (i.e. for marketing) we will seek to renew this every two years

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

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for data analytical purposes in which case we may use this information indefinitely and share it with third parties without further notice to you.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw 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.

10. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party, or which involves you (i.e. with your employer or a supplier) or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Consent means where you give your informed active consent to us to process your personal data.

THIRD PARTIES

INTERNAL THIRD PARTIES

Other companies in the Invyte group acting as joint controllers or processors and which provide IT and system administration services and undertake leadership reporting.

EXTERNAL THIRD PARTIES

- Service providers acting as processors based in the UK who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors, credit reference agencies and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the UK who require reporting of processing activities in certain circumstances.
- Marketing automation platforms, acting as a processor, such as Google Analytics and The Rocket Science Group LLC t/a

MailChimp based in the EU/EEA or US who provide email marketing automation services.

- Survey development and distribution platforms, acting as a processor, such as Survey Monkey Inc. and SurveyMonkey Europe UC t/a SurveyMonkey, based in the EU/EEA and US who provide online survey development services.
- Social media platforms based in the EU/ EEA and US acting as processor or joint controllers

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.

Where you object to direct marketing we shall maintain a restricted record of Contact and Identity Data recording that you have opted out of receiving marketing and we can ensure that no future marketing is carried out. Unless otherwise informed no other processing shall be carried out in relation to this restricted record. We will need to maintain where you have opted out of receiving marketing and this is to prevent any future marketing being carried out and, unless otherwise informed, no other processing shall be carried out in relation to this information.

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.

11. COOKIE POLICY

Our Sites use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience

when you use our Sites and also allows us to improve our Sites. By continuing to use the Site, and accepting our cookie notifications, you are agreeing to our use of cookies.

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

We use the following cookies:

Strictly necessary cookies. These are cookies that are required for the operation of our Sites. They include, for example, cookies that enable you to log into secure areas of our Sites.

Analytical/performance cookies. They allow us to recognise and count the number of users and visitors and to see how they move around our Sites when using them. This helps us to improve the way our Sites work, for example, by ensuring that users are finding what they are looking for easily.

Functionality cookies. These are used to recognise you when you return to our Sites. This enables us to personalise our content for you, greet you by name and remember your preferences.

Targeting cookies. These cookies record your visit to our Sites, the pages you have visited and the links you have followed. We will use this information to make our Sites and the content displayed more relevant to your interests. We may also share this information with third parties for this purpose.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.