

# Privacy Policy

Version 4

This Privacy Policy applies as between you, the User of the Website or Application and Ideagen Plc ("Ideagen", "we", "us", "our"), the owner and provider of the Website or Application. This Privacy Policy applies to our use of any and all personal data collected by us in relation to your use of the Website or Application. If you have been provided with the Website or Application by your company to use ("Company User"), and if Ideagen and your company have an existing agreement in place that governs the use of the Website or Application ("Company Agreement") then this Privacy Policy is subordinate to the Company Agreement.

## 1. Definitions and Interpretations

1.1 In this Privacy Policy the following terms shall have the following meanings:

"Application"	means the Application you are currently using on a device (e.g., mobile, tablet);
"Cookie"	means a small text file placed on your computer by the Website when you visit certain parts of the Website or Application and/or when you use certain features of the Website. Details of the cookies used by the Website or Application are set out in Clause 11;
"Data Protection Law"	means the UK Data Protection Laws and any other European Union legislation relating to personal data and all other legislation and regulatory requirements in force from time to time which apply to a party relating to the use of personal data (including, without limitation, the privacy of electronic communications) and the terms "controller", "processor", "data subject", "personal data", "personal data breach", "processing", and "appropriate technical and organisational measures" shall having the meanings given to them in Data Protection Law.
"Ideagen"	means Ideagen Plc, a company registered in England and Wales, registered number 02805019, having its registered office at One Mere Way, Ruddington, Nottingham, England, NG11 6JS or its affiliates;
"UK and EU Cookie Law"	means the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011, and the Privacy and Electronic Communications Directive 2002/58/EC (as updated by Directive 2009/136/EC), all as amended from time to time;
"UK Data Protection Law"	means all applicable data protection and privacy legislation in force from time to time in the United Kingdom including the General Data Protection Regulation ((EU) 2016/679); the Data Protection Act 2018; and the UK and EU Cookie Law, all as amended;
"User"	means any third party that accesses the Website or Application that is not acting on behalf of Ideagen; and
"Website"	means the Website that you are currently using and any sub-domains of the site unless expressly excluded by their own term and conditions.

## 2. Scope of this Privacy Policy

2.1 This Privacy Policy applies only to the actions of Ideagen with respect to the Website or any Application. It does not extend to any websites that can be accessed from the Website or Application including, but not limited to, any links we may provide to social media websites.

- 2.2 We will act as a data controller where we make decisions on how your personal data is used in connection with the Website or Application or our other products and services, and we will act as a data processor where we only use your personal data as authorised and instructed by a third party in connection with the Website, Application or our other products and services.
- 2.3 Where we are acting as a data controller, we are responsible for the obligations of a data controller under Data Protection Law in connection with the processing of your personal data and we use this Privacy Policy to provide you with information about our use of your personal data.
- 2.4 Where we are acting as a data processor, the relevant third party will be acting as data controller and will be responsible for the obligations of a data controller under Data Protection Law in connection with the processing of your personal data. If you are accessing the Website, Application or our other products and services through a third party, you should contact them with queries regarding the processing of your personal data or compliance with Data Protection Law.

### 3. How to contact us

- 3.1 Ideagen is a public limited company incorporated in England and Wales (company number 02805019) and having its registered address at One Mere Way, Ruddington, Nottingham, England, NG11 6JS.
- 3.2 Any comments, complaints or questions regarding our Privacy Policy may be addressed to [dataprotection@ideagen.com](mailto:dataprotection@ideagen.com).

### 4. Personal Data Collected

- 4.1 In the course of using the Website or the Application, you may provide identifiable information which may be used to identify or contact you. The following personal data may be collected by the Website or Application;
- **Contact information**, such as first and last names, email address and telephone number;
  - **Device and Browser Information**, such as network and connection information (including Internet Service Provider and Internet Protocol (IP) addresses), device and browser identifiers and information (including device, application or browser type, version, plug-in type and version, operating system, user agent, language and time zone settings and other technical information), advertising identifiers, cookie identifiers and information and similar data;
  - **Account Information**, such as security-related information (including passwords and authentication methods);
  - **Usage Information and Browsing History**, such as usage metrics, content interactions and user journey history (including page navigations, a list of URLs starting with a referring site, timestamps, content viewed or searched for and other data relating to your activity on the Website and the site you exit to);
  - **Organisational Information**, such as your employer or organisations of which you are a member, your status within an organisation, and similar data; and
  - Any additional applicable information you, your employer or other organisation wishes to disclose.

## 5. Our Use of Personal Data

5.1 Any and all of the above personal data may be required by us from time to time in order for us to interact with you and to provide you with the best possible service and experience when using our products. We will always process your personal data for one or more of the following lawful bases:

- **Your Consent** – where you have given us your informed consent to process your personal data for a designated purpose, such as to provide you with relevant promotional materials.
- **Performance of a Contract** – where processing your personal data is necessary for the performance of a contract.
- **Legitimate Interests** – where processing your personal data is necessary for the legitimate interests of Ideagen or a third party, except where these interests are overridden by your fundamental rights and freedoms.
- **Compliance with Law** – where processing your personal data is necessary for us to comply with a legal obligation.

5.2 Specifically, your personal data may be used by us for the following reasons:

Use	Legal Bases
To provide, analyse and administer our products/services	Performance of a Contract
For internal research and development for new content, products, and services, and to improve, test, and enhance the features and functions of our current Services	Legitimate interests
For internal record keeping	Legitimate interests
To detect and prevent fraud and abuse to ensure the security and protection of all customers and others, as well as to identify and authenticate your access to our products/services or to identify and authenticate you before we provide you with certain information	Legitimate interests
To email promotional materials that may be of interest to you	Consent
To contact you for market research purposes which may be done using email, telephone, fax, or mail	Consent
To comply with your instructions or to fulfil other specific purposes for which you have given your consent	Consent
To comply with the law and our legal obligations, including to respond to a request or order from a court, regulator, or authority, as well as to fulfil our contractual obligations with our customers when they	Compliance with Law Performance of a Contract

arrange access to our products/services for you	
To exercise Ideagen's legal rights, including to take action against those in breach of the terms and conditions applicable to our products and services	Compliance with Law
To effect the sale, merger, acquisition or other transfer of control of all or part of Ideagen or its business	Legitimate Interests

5.3 Unless we are obliged or permitted by law to do so, and subject to Clause 8, your personal data will not be disclosed to any third parties.

5.4 We take reasonable measures to ensure all information provided is managed securely. Access to the information you provide will be restricted to only those who have the relevant authority and is stored securely in accordance with the requirements under Data Protection Law.

## 6. Controlling Use of Your Data

6.1 In accordance with the data subject's rights under Data Protection Law, in certain circumstances where you are required to submit personal data, you will have to positively opt-in and will also be given options to restrict our use of your personal data. This may include the following:

- Use of personal data for direct marketing purposes; and
- Sharing personal data with third parties (subject to Clause 8).

## 7. Your Rights

7.1 You shall have the right to obtain from the controller confirmation as to whether or not personal data concerning you is being processed, and, where that is the case, access to this personal data and the following information:

- The purposes of the processing;
- The categories of the personal data concerned;
- The recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- Where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- The existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- The right to lodge a complaint with a supervisory authority;
- Where the personal data are not collected from the data subject, any available information as to their source;

- The right to object to receiving marketing information/communications. You can unsubscribe to our marketing mailing list by clicking unsubscribe at the footer of any marketing received by us; and
- The right to obtain from the controller the erasure of personal data concerning you without undue delay. Should you wish to have all data concerning you to be erased, please contact [dataprotection@ideagen.com](mailto:dataprotection@ideagen.com).

## 8. Third Party Websites and Services

- 8.1 We may, from time to time, employ the services of other parties for dealing with matters that may include, but not limited to, payment processing, delivery of purchased items, search engine facilities, customer support, advertising and marketing, website and data hosting and data analytics. We may provide the providers of such services with access to certain personal data provided by Users of the Website or the Application.
- 8.2 Such personal data will, however, only be provided to such parties in accordance with this Privacy Policy and only to the extent required by them to perform the services that we request.

## 9. Links to Other Websites

- 9.1 The Website or Application may, from time to time, provide links to third party websites, applications, products, software, services, or content. We have no control over such third parties and is in no way responsible for the content thereof. This Privacy Policy does not extend to your use of such third party resources. Users are advised to read the relevant third party's privacy policy, notice or statement prior to using such resources.

## 10. Changes of Business Ownership and Control

- 10.1 We may, from time to time, expand or reduce our business and this may involve the sale, merger, acquisition and/or the transfer of control of all or part of Ideagen or our business (including as the result of corporate re-structuring). Personal data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use the personal data for the purposes for which it was originally supplied to us.

## 11. Cookies

- 11.1 You may restrict your internet browser's use of Cookies.
- 11.2 The Website or Application may place and access certain first party Cookies on your device if you have consented to our Privacy Policy. First party cookies are those placed directly by us via the Website or Application and are used only by Ideagen. We use Cookies to improve your experience of using the Website or Application and to improve our range of products and services. We have carefully chosen these Cookies and taken steps to ensure that your privacy is protected and respected at all times.
- 11.3 By using the Website or Application, you may receive certain third party Cookies on your device. Third party cookies are those placed by websites and/or parties other than Ideagen. Third party cookies are used on the Website or Application for advertising services and are detailed in full below. These cookies are not integral to the services provided by the Website or Application.
- 11.4 All Cookies used by the Website or Application are used in accordance with current UK and EU Cookie Law.

11.5 Before any Cookies are placed on your computer, subject to sub-Clause 11.6, you will be presented with a message bar at the top requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website or Application may not function fully or as intended.

11.6 Certain features of the Website or Application depend upon Cookies to function. UK and EU Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown below. Your consent will not be sought to place these Cookies. You may still block these cookies by changing your internet browser’s settings as detailed below.

11.7 The following first party Cookies may be placed on your computer:

Name of Cookie	Provider	Purpose	Strictly Necessary
Ideagen Plc	Ideagen Plc	To login to the Ideagen Plc account	No

In addition, the following Cookies will only be applicable for Q-Pulse EHS:

Site	Ideagen Plc	To retain the currently selected site	Yes
loginDomain	Ideagen Plc	To retain the selected log in user domain	Yes
lawTabs	Ideagen Plc	To retain the currently selected legislation register	Yes
AWSALB	Amazon.com, Inc	Manages web traffic	Yes

11.8 The Website and the Application use analytics services provided by Google Analytics. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling us to better understand how Users use the Website or Application. This, in turn, enables us to make the necessary improvements, the products and services offered through it the channel. You do not have to allow us to use these Cookies, as detailed below; however, whilst our use of them does not pose any risk to your privacy or your safe use of the Website or Application, it does enable us to continually improve our business.

11.9 The analytics services used by the Website or Application use Cookies to gather the required information. Certain of these Cookies may be placed immediately when you decide to visit the Website or Application and it may not be possible to obtain your prior consent. You may remove these Cookies and prevent future use of them by following the steps set out below.

11.10 The analytics services used by the Website and the Application are as follows:

Name of Cookie	Provider	Purpose
Google Analytics	Google	To gather web statistics from visitors to the Website or Application

Click Dimensions	Click Dimensions	To gather visitor information
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- 11.11 You can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser.
- 11.12 You can choose to delete Cookies at any time; however, you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.
- 11.13 It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.
- 11.14 Cookies can also be disabled on your device by reviewing your browser settings.

## 12. International Transfers

- 12.1 We may transfer personal data that we collect from you to third party data processors located in countries that are outside of the European Economic Area. In these circumstances, we will always take measures to ensure we have adequate legal safeguards in place. For example, we have entered into written agreements with all relevant third party processors that ensure your data receives the same protection as if it were being processed inside the European Economic Area.

## 13. How long do we keep Personal Data?

- 13.1 Any personal data you submit will be retained by us for no longer than as necessary to fulfil the stated/contractual purposes, or as reasonably necessary for us to retain such information in order to provide you with the services which you have requested or for Ideagen to comply with laws and regulations. After the retention period is over, Ideagen securely disposes or anonymizes your personal information in order to prevent loss, theft, misuse, or unauthorized access. If you withdraw your consent or request removal of your personal data, such data will be destroyed, but in doing so, you acknowledge that our ability to provide you with access to our Website, Application and related services may be adversely affected. You can withdraw your consent or request removal of your personal data by contacting [dataprotection@ideagen.com](mailto:dataprotection@ideagen.com).

## 14. Changes to this Privacy Policy

- 14.1 We reserve the right to change this Privacy Policy as we may deem necessary from time to time or as may be required by law. Any changes will be posted promptly on the Website and the Application and you are deemed to have accepted the terms of this Privacy Policy on your first use of the Website or Application following any alterations.