

Invenias User Privacy Notice

Invenias Limited (Invenias, we, us or our) is committed to protecting the privacy of its Customers and of Users of its products and services. **Customers** are any current or prospective customer of Invenias and **Users** are individuals who are permitted by a Customer to access or use Invenias products or services. This Notice explains how Invenias collects and uses personal information in relation to use of its products and services, how we will look after your personal information and tells you about your privacy rights.

In the case of personal data contained in the Customer's database (**Content Data**), Invenias acts as processor and processes such data on behalf of its Customers and solely subject to their instructions.

In the case of personal data collected from Users when creating accounts (**User Accounts**) for Users to access and use Invenias products and Services (**Account Data**), Invenias acts as data controller in respect of such personal information.

Invenias Limited is registered in England and Wales under company number 05323637 and has its registered office at Davidson House, Forbury Square, Reading RG1 3EU, UK. Our wholly owned subsidiary is Invenias Inc., a Delaware corporation having its principal place of business at 125 Park Avenue, Suite 2520, New York, 10017, USA.

The Invenias person responsible for data protection is Andy Warren.

Where Invenias is data controller it processes personal information in a manner consistent with the laws of the countries in which it does business. Invenias will treat personal information as confidential and will only use personal information as provided in its terms and conditions for the supply of its services. Please note this Privacy Notice does not apply to personal information collected if you visit the Invenias website, in this case please see our [Privacy Notice](#).

1. What information do we collect from you and how do we collect information?

1.1 **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 do not collect any special categories or sensitive 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. Invenias only processes such data if it is Content Data and as such is obliged to do so on behalf of the Customer.

1.2 **Services on behalf of Customers:** Invenias collects personal information about Users on behalf of Customers and as per their instructions for the provision of our products

and services. Users may provide personal information to Invenias and/or the Customer through the use of Invenias products or services. We recommend Users read Customer’s Privacy Policy before providing any personal information.

1.3 Setting up User Accounts: Invenias collects personal information directly from a User or a Customer to set up a User Account. This may include User’s name, email address, telephone number, employer, LinkedIn profile address and other similar information. If a User holds a User Account with Invenias, User will also have a unique password which enables him/her to access their User Account.

Invenias also collects information about your use of our products and services by using cookies, including third party cookies. We track your use of the Invenias products and services and interaction with other applications and will collect your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, operating system and other information on the devices you use to access the Invenias services. For details about how we use cookies, please read our [Invenias User Cookie Policy](#).

Invenias adds the Account Data of Users who work for or are engaged by a Customer to its ICRM and marketing database. We will add the data you give us and amalgamate it with any other information that we hold on you from our previous interactions and engagements with you and from information you have posted on publicly available sources such as Linked In, Executive Grapevine, Bluesteps, Xing and other professional networking sites along with your company website and any other public sources.

1.4 Children's Privacy: The Invenias products and services are not directed at children under the age of 13. Invenias does not target the products or services to children under 13. Invenias does not knowingly collect personally identifiable information from children under the age of 13. If you are under the age of 13, please do not provide us with any Personal Information.

2. How do we use the information we collect?

2.1 Purposes for which we use your personal information: We will only use your personal information when the law allows us to. We have set out below in 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.

Purpose	Legal basis for processing
To register you as a User and set up your User Account	As a processor under contract with Customer to provide our products and services on behalf of Customer
To provide you with access to the Invenias products and services	As a processor under contract with Customer to provide our products and services on behalf of Customer

To provide you with support services in relation to our products and services	As a processor under contract with Customer to provide our products and services on behalf of Customer
To manage our relationship with you which will include: (a) notifying you about changes to our privacy notice; (b) providing you with information about Invenias products and services; (c) informing you about useful information related to our products and services, for example, product features, tutorials and webinars; and (d) asking you to give us feedback on our products or services.	(a) As a processor under contract with Customer to provide our products and services on behalf of Customer (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how Users use our products/services, to develop our products and services and grow our business)
To facilitate our understanding of the market we are selling to, the moves within that market of key personnel and to keep in touch with you	Necessary for our legitimate interests (to study how customers use our products/services, to develop our products and services and grow our business)
To administer and protect our business and the Invenias Platform (including administration services, troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Necessary for our legitimate interests (for running our business, provision of administration, support and IT services, network security, to prevent fraud and in the context of a business reorganisation) (b) Necessary to comply with a legal obligation
To use data analytics to improve the Invenias Platform, our products and services, marketing, customer relationships and experiences	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our Platform updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest	Necessary for our legitimate interests (to develop our products/services and grow our business)

2.2 Marketing: We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You will receive marketing communications from us as a User. You can ask us to stop sending you marketing messages at any time by following the unsubscribe links on any marketing message sent to you or by [Contacting us](#) at any time. Where you opt out of receiving these marketing messages, this will not apply to any service messages we need to send you as a User.

2.3 We may collect anonymized aggregate data, which does not identify any users for research, analysis, testing, monitoring, risk management and administrative purposes.

3. Invenias Data Disclosure Practices

Invenias may share personal information with the following third parties:

- its affiliates;
- the [Invenias Third Party Processors](#) listed whose services support the Invenias products and services;
- its third party marketing database service providers, Marketo and Force24;
- in connection with the sale or transfer of the whole of or part of our business;
- law enforcement, legal or regulatory authorities or if it is required by a court order or any legal or regulatory requirement; and
- professional advisers and to ensure the safety and security of our customers, users, consumers and third parties and to protect our rights and property and the rights and property of our guests and third party suppliers.

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.

4. Transferring Information Overseas

4.1 Services on behalf of Customers: Content Data will be stored on servers in the region or regions selected by the Customer when it purchases Invenias products or services. Support for Invenias products and services is provided on a follow the sun basis from engineers who may be based outside of the region in which you are based. You agree to any data transfer that may occur as a result of the provision of support services. You should be aware that countries outside your region may not offer the same level of data protection as your region, however, we will ensure that all transfers by Invenias of personal data outside of the region shall be effected by way of appropriate safeguards and in accordance with applicable data protection laws.

4.2 User Accounts: Account Data will be transferred, stored and/or processed outside the region in which the User is based as it may be accessed by Invenias and its affiliates for the purposes of providing support services or for providing information about the Invenias products and services. By submitting your personal information, you agree to this transfer, storing and/or processing. You should be aware that countries outside your region may not offer the same level of data protection as your region, however, we will ensure that all transfers by Invenias of personal data outside of the region shall be effected by way of appropriate safeguards and in accordance with applicable data protection laws.

4.3 Please [Contact us](#) if you want further information on the appropriate safeguards and specific mechanisms used by us when transferring personal data out of the EEA.

5. Security and Integrity of Personal Information

Invenias has put in place appropriate security measures to prevent 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.

6. Data Retention

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.

Please [Contact Us](#) if you would like details of our retention periods for your personal data.

7. User Rights

7.1 Services on behalf of the Customer: If your request involves Content Data, we advise you to contact the Customer. You may also send your request to us at privacy@invenias.com but please note that, as we are solely processing personal information on behalf of Customer, we cannot decide if it can be accessed, amended or deleted. If you send us a request concerning Content Data we will send your request to the relevant Customer.

7.2 User Accounts: If your request involves your Account Data, you have the right:

- to access any personal data we hold about you and we will provide details of the purposes of the processing, the types of personal data we hold and the people to whom your personal data has been disclosed;
- to have inaccurate or incomplete personal data corrected or to restrict the processing of personal data whilst the accuracy is checked;
- in certain circumstances, have data we hold about you transferred to another data controller. Note, 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;
- to ask to have personal data we hold about you erased. 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;

- to ask us not to process your personal data for direct marketing purposes;
- to object to processing of your personal data where we are relying on a legitimate interest 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;
- to 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; and
- lodge a complaint with the Information Commissioner's Office if you have a concern about your personal data: <https://ico.org.uk/concerns/>

7.3 You can exercise your rights at any time by contacting us at privacy@invenias.com. You may also withdraw your consent to direct marketing by clicking the unsubscribe button on any of our communications. 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).

7.4 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.

8. Compliance

Processing of personal information will be conducted in accordance with all data protection laws to the extent applicable.

Invenias will cooperate with the relevant data protection authorities in the investigation and resolution of complaints relating to personal data and this Notice.

9. Changes to this Notice

If it is necessary for us to alter the terms of this Notice, we will post the revised notice on this page.

10. How you can contact us

If you have any questions about this privacy notice, please contact us at privacy@invenias.com or Invenias Limited, Davidson House, Forbury Square, Reading RG1 3EU, United Kingdom.

Notice effective May 2018