

COMPANY NAME: IDEYA BUSINESS AND MARKETING CONSULTANCY LTD. PRIVACY POLICY

Introduction

Welcome to the Ideya Ltd. Privacy Notice.

Based on the new General Data Protection Regulation (GDPR), we have updated our Privacy Policy in order to comply with the accompanying new changes in data protection law.

Ideya Business and Marketing Consultancy Ltd., company number (no. 4927457) provides consulting services in market research, business planning and strategic planning. Ideya Ltd. is committed to protecting your personal data and respects your privacy. The privacy notice below will inform you as to how we look after your personal data and tell you about your privacy rights and how law protects you.

Private Policy Notice

This Privacy Policy aims to explain how Ideya Ltd. collects, uses, and processes your personal data through your use of our website (www.ideya.eu.com) or our services, including any data you may provide when you purchase our product or services or participate in any of our studies. It is important that you read this privacy notice together with any other privacy or fair processing notice we may provide on specific cases 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.

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.

Links to third party sites that may appear on our website (www.ideya.eu.com) are chosen with a great care, but are excluded from our Private Policy. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. These third party sites do not fall under our responsibility, and we may encourage you to read a privacy policy of every linked site you visit.

Ideya Ltd. is the controller and responsible for your personal data (collectively referred to as Ideya Ltd., 'we', 'us', or 'our' in this privacy notice).

This version was last updated on May 20th, 2018.

The Information 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 kind of personal data about you, which we have grouped together as follows:

- Identity Data includes first name, last name, title, company name,
- Contact Data includes your Company address, email address and telephone numbers,
- Transaction Data includes details about payments to and from you/your company and other details of products and services you have purchased from us or we have purchased from you,
- Information on your products and your company if we conduct study on your industry based on the publicly available information or input from you or your company.

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).

How We Collect Your Personal Information?

We collect data from and about you through:

- **Direct interactions:** You may give us your identity or contact data by post, phone, email, business card, report order form or otherwise. This includes personal data:
 - you provide when you place an order for our product or services and includes circumstances in which you apply for our products or services,
 - request marketing to be sent to you,
 - participate in our market research studies,
 - give us a feedback,
 - apply for employment or to provide us with services,
 - share information on social media from our website,
 - by corresponding with us by phone, email, online chat or otherwise.

As you interact with our website, we may automatically collect technical data about your equipment, browsing activity and patterns. We collect this personal data by using cookies and other technologies. Please see our cookies policy below for further details. Third parties or publicly available sources are listed below:

- **Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources such as:
 - Technical data from analytics providers such as Google Analytics, Scribd or Slideshare.net Analytics, where we post our presentations or report extracts.
 - Identity and Contact Data from publicly available sources such as Company House or your website.
- **Cookies Policy:** Our website (www.ideya.eu.com) uses cookies. Cookies are small pieces of text sent by your web browser by a website you visit. A cookie file is stored in your web browser and allows the Service or a third-party to recognize you and make your next visit easier and the Service more useful to you. We use cookies for the following purposes: to enable certain functions of the Service, to provide analytics, to store your preferences, to enable advertisements delivery, including behavioural advertising or to improve the usability of the website. However, enabling cookies in your web browser is

necessary if you wish your selections to be remembered for future visits on the same computer. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. For more information about cookies and instructions on how to adjust your browser settings to restrict or disable cookies, see the IAB website at www.allaboutcookies.org or Network Advertising Initiative at <http://www.networkadvertising.org>. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

How We Use Your Personal Information?

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:

- To respond to your comments, questions, queries, or provide customer services,
- Communicate with you about our products, services, and events offered by us and others, to provide you with the news and information that we think will be of interest to you, to conduct market research studies, or contact you about events.
- When we need to process your data in order to perform our obligation under a contract that we are about to enter into or have entered into with you,
- When we need to notify you about changes in our services,
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests,
- Where we need to comply with a legal or regulatory obligations.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for Which We Will Use Your Personal Information

Personal data may be legally collected and used if it is necessary for a legitimate interest of the organisation using the data, as long as its use is fair and does not adversely impact the rights of the individual concerned.

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. When we use your personal information, we always consider if it is fair and balanced to do so and if it is within your reasonable expectations. We will always balance your rights and our legitimate interests to ensure that we use your personal information in ways that are not intrusive or unfair. 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).

In the following table we have identified what are legitimate interests are and what type of data we may collect. Please 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.

Purpose or Activity	Data Type	Lawful bases/bases for processing data including basis of legitimate interest
When you become a client/customer	Identity, Contact	Performance of contract with you, which means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
Administration and operational management to process and deliver your orders including: responding to solicited enquires, providing information that you have requested, fulfilment of request placed by you or on your behalf, manage and process payments, fees and charges, collect and recover money owed to us	Identity, Contact, Financial Transaction, Marketing & Communications	Performance of a contract with you, Necessary for our legitimate interests, Comply with a legal or regulatory obligation, which means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.
Promote our purposes, including development of new offers and services,	Identity, Contact, Marketing & Communications	Necessary to inform you about our products and services
To manage our relationship with you which may include: notifying you about changes to our terms or privacy policy, other administration management including asking you to leave a review or take a part in the study, research, events, and others	Identity, Contact, Profile, Marketing & Communication	Performance of a contract with you, Necessary to comply with a legal obligation, Necessary for our legitimate interest (to keep our records updated and to study how customers use product/services)
To enable you to partake in our studies and surveys	Identity, Contact, Profile, Usage, Marketing & Communication	Performance of a contract or agreement with you. Necessary for our legitimate interests to conduct research
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	Identity, Contact, Profile, Usage, Marketing & Communication, Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, product/services, marketing, customer relationships and experiences	Technical Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our websites updated and relevant, to develop our business and to inform our marketing)
To make suggestions and recommendations to you about goods or services that may be of interest to you	Identity Contact Technical Usage Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

When it comes to marketing we strive to provide you with choices regarding certain personal data uses, particularly around marketing, market research and advertising:

- Promotional offers from us: We may use your Identity, Contact, Technical, Usage and Profile 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. You will receive marketing communications from us if you have requested information from us or placed a request with us or purchased products or services from us or if you provided us with your details during a networking event.
- Third-party marketing: We will get your opt-in consent before we share your personal data with any company outside Ideya Ltd. to other companies for marketing purposes.
- Opting out: You can ask us or third parties to stop sending you marketing messages at any time by contacting us. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

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.

Please contact us if you need additional information on our uses of legitimate interests and about the specific legal ground we are relying on to process your personal information.

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. 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.

Disclosures of Your Personal Data

We may have to share your personal data in some instances with the selected third parties including:

- Business partners and sub-contractors for the performance of any contract we enter into with them and you
- Analytics and search engine providers that assist us in the improvement and optimization of our website.
- If we under a duty to disclose or share your personal data in order to comply with any legal obligation or in order to enforce or apply our terms of use and other agreements, or to protect the rights, property, or our safety and/or customers or others. This includes exchanging information with other organisations for the purposes of fraud protection and credit risk reduction.

- We may allow our staff, consultants and/or external providers (data processors) acting on our behalf to access and use your information for the purposes for which you have provided to us (e.g. to process payments, to analyse data). We only provide them with the information they need to deliver the relevant service, and ensure that we take steps to ensure that they process personal data in a secure manner. External third parties may include:
 - Professional advisers acting as processors or joint controllers including lawyers, bankers, and auditors who provide consultancy, banking, legal, insurance and accounting services.
 - HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances

How Do We Protect the Security of Personal Data?

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 data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so within 72 hours.

How Long Do We Keep Your 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 clients (including Contact, Identity, Financial and Transaction Data) for six (6) years after they cease being clients for tax purposes. In some circumstances you can ask us to delete your data and some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes. The retention data for Google Analytics is set up for 26 months, after which user-level and event level data stored by Google Analytics is automatically deleted from Analytics servers. The retention period applies to user-level data associated with cookies, user-identifiers and advertising identifiers.

If you request to receive no further contact from us, we will keep some basic information about you on our suppression list in order to avoid sending you unwanted materials in the future.

Your Legal and Privacy Rights

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

- Request access to your personal data (commonly known as a "data subject access request") - You have the right to know what information we hold about you and to ask, in writing, to see your records. We will provide you with details of the records we hold as soon as possible and at latest within one month, unless the request is complex. We may require proof of identity before we are able to release the data. Please use our contact details below to contact us if you would like to exercise this right.
- Request to be informed - You have the right to be informed how your personal data will be used. This policy as well as any additional information or notice that is provided to you either at the time you provided your details, or otherwise, is intended to provide you with this information.
- Request correction of your personal data that we hold about you - If you believe our records are inaccurate, you have the right to ask for those records concerning you to be updated. To update your records please get in touch with us using our contact details below.
- Request erasure of your personal data - In some cases, you have the right to have your personal data deleted where there is no good reason for us continuing to process it. Please 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. Where you have requested that we do not send you marketing materials we will need to keep some limited information in order to ensure that you are not contacted in the future.
- Object to processing of your personal data - You also have a right to object to us processing data where we are relying on it being within our legitimate interests to do so (for example, to send you direct marketing by post). To do this, or to discuss this right further with us, please contact us using the contact details below.
- Request restriction of processing your personal data - In certain situations you have the right to ask for processing of your personal data to be restricted because there is some disagreement about its accuracy or legitimate usage.
- Request transfer of your personal data - Where we are processing your personal data because you have given us your consent to do so, you have the right to request that the data is transferred from one service provider to another.
- Right to withdraw consent - Where we process your data on the basis of your consent (for example, to send you marketing texts or e-mails), you can withdraw that consent at any time.

If you wish to exercise any of the rights set out above or to discuss your rights with us, please contact us using our contact details below. In this case, 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.

We try to respond to all legitimate requests within two weeks. Occasionally it may take us longer than two weeks 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.

How We Will Let You Know Of Changes to Our Private Policy?

We may update this policy from time to time without notice to you, so please check it regularly. We will however aim to bring any significant changes to your attention. The privacy policy was last updated on 20 May 2018.

Questions or Complaints

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below:

Contact details:

- Company Name: Ideya Business and Marketing Consultancy Ltd.
- Name or title responsible for Policy Notice: Luisa Milic, Director
- Email address: lmilic@ideya.eu.com
- Address: 39 Highfield Ave., Cambridge CB42AJ, United Kingdom
- Telephone number: +44 (0)789 1166 897

If you are unhappy with the way in which we have handled your personal information, please contact us using the details above. You are also entitled to make a complaint to the Information Commissioner's Office (<https://ico.org.uk/>), the UK supervisory authority for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

Cambridge, 20th May 2018

Luisa Milic, Director

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