

Privacy Policy

This Privacy Policy sets out how we, PLP London Limited, trading as Innov8estate, collect, store and use information about you when you use or interact with our website, www.innov8estate.co.uk (our website) and where we otherwise obtain or collect information about you. This Privacy Policy is effective from May 25th 2018 .

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Summary

This section summarises how we obtain, store and use information about you. It is intended to provide a very general overview only. It is not complete in and of itself and it must be read in conjunction with the corresponding full sections of this Privacy Policy.

- Data controller: **[insert the name of the data controller]**
- How we collect or obtain information about you:
 - o when you provide it to us by contacting us, placing an order on our website and registering our details with a sub-site belonging to one of our data controller clients,
 - o from our use of our website, use of cookies, and occasionally, from third parties.
- Information we collect: name, contact details, payment information e.g. our credit or debit card details, information about our computer or device (e.g. device and browser type), information about how you use our website (e.g. which pages you have viewed, and which documents you have downloaded or uploaded , (if applicable) the time when you view them and what you clicked on, the geographical location from which you accessed our website (based on our IP address), company name or business name (if applicable), VAT number (if applicable), any classifieds added where the sale or purchase of any items within an internal Intranet (If applicable)

- How we use our information: for administrative and business purposes particularly to contact you and process orders you place on our website, to improve our business and website, to fulfil our contractual obligations as a Data Processor and to advertise our goods and services, to analyse our use of our website, and in connection with our legal rights and obligations.
- Disclosure of our information to third parties: only to the extent necessary to run our business, to fulfil any contracts we enter into with you, where required by law or to enforce our legal rights.
- Do we sell our information to third parties (other than in the course of a business sale or purchase or similar event): No
- How long we retain our information: for no longer than necessary, taking into account any legal obligations we have (e.g. to maintain records for tax purposes), any other legal basis we have for using our information (e.g. our consent, performance of a contract with you or our legitimate interests as a business) [and certain additional factors described in the main section below entitled How long we retain our information]. For specific retention periods in relation to certain information which we collect from you, please see the main section below entitled How long we retain our information.
- How we secure our information: using appropriate technical and organisational measures such as storing our information on secure servers, encrypting transfers of data to or from our servers using Secure Sockets Layer (SSL) technology, encrypting payments you make on or via our website using Secure Sockets Layer (SSL) technology, only granting access to our information where necessary [and] [insert any additional security measures you use to protect personal information such as encryption of personal data, encrypted email, pseudonymisation and/or anonymisation of personal information].
- Use of cookies: we do not use cookies on our website.
- Transfers of our information outside the European Economic Area: we will only transfer our information outside the European Economic Area if we are required to do so by law OR [in certain circumstances] we [transfer] our information outside of the European Economic Area[, including to the following countries: [insert list of countries to which you transfer information]. Where we do so, we will ensure appropriate safeguards are in place[, including [insert safeguards used for data transfers outside the European Economic Area e.g. [the third parties we use who transfer our information outside the European Economic Area have self-certified themselves as compliant with] the EU-U.S. Privacy Shield]].
- Use of automated decision making and profiling: use automated decision making profiling. We use web analytics
- Our rights in relation to our information
 - o to access our information and to receive information about its use
 - o to have our information corrected and/or completed
 - o to have our information deleted
 - o to restrict the use of our information
 - o to receive our information in a portable format
 - o to object to the use of our information
 - o to withdraw our consent to the use of our information
 - o to complain to a supervisory authority

- Sensitive personal information: we do not knowingly or intentionally collect what is commonly referred to as ‘sensitive personal information’. Please do not submit sensitive personal information about you to us. **For more information, please see the main section below entitled Sensitive Personal Information.**

Our details

The data controller in respect of our website is [insert name of company or individual] [(company registration number: [insert company registration number, if applicable])] of [insert address]. You can contact the data controller by writing to [insert correspondence address for the data controller] or sending an email to [insert email address].

[The data controller’s representative is [insert name of the data controller’s representative]. You can contact the data controller’s representative by writing to [insert correspondence address for the data controller’s representative] or sending an email to [insert email address].]

[The data protection officer for the data controller is [insert name of the data protection officer]. You can contact the data protection officer by writing to [insert correspondence address for the data protection officer] or sending an email to [insert email address].]

If you have any questions about this Privacy Policy, please contact the data controller.

Information we collect when you visit our website

We collect and use information from website visitors in accordance with this section and the section entitled Disclosure and additional uses of our information.

Web server log information

We use a cluster of Amazon Web Services servers to host our website, the privacy policy of which is available here: <https://aws.amazon.com/privacy/>. Our website servers automatically log the IP address you use to access our website as well as other information about our visit such as when you logged in and which files you have downloaded. This information is not used to track our browsing so much as it is required to monitor access to the information provided on the website.

Our servers and all data stored is located solely in Amazon’s Republic of Ireland data centre.

All data transfers to and from our servers are encrypted using secure certification. All data stored on our database and all files contained are secured using private networks facilitating only authorised requests. All means of security has been provided where possible using Amazon Web Services security functionality.

Use of website server log information for IT security purposes

Our servers collect and store server logs securely to ensure network and IT security and so that the server and website remain uncompromised. This includes analysing log files to help identify and prevent unauthorised access to our network, the distribution of malicious code, denial of services attacks and other cyber attacks, by detecting unusual or suspicious activity.

Information about who accesses which files are provided solely to the owners of these files and web-pages for their own security and legal requirements.

We do not make, nor do we allow our hosting provider to make, any attempt to identify you from the information collected via server logs.

Legal basis for processing: compliance with a legal obligation to which we are subject (Article 6(1)(c) of the General Data Protection Regulation).

Legal obligation: recording access to our website using server log files is an appropriate technical measure to ensure a level of security appropriate to protect information collected by our website under Article 32(1) of the General Data Protection Regulation.

Use of website server log information to analyse website use and improve our website

[We do not collect the user information by our website server logs to analyse how our website users interact with our website and its features.]

Cookies

We do not use cookies on our website.

Information we collect when you contact us

We collect and use information from individuals who contact us in accordance with this section and the section entitled Disclosure and additional uses of our information.

Email

When you send an email to the email address displayed on our website we collect our email address and any other information you provide in that email (such as our name, telephone number and the information contained in any signature block in our email).

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at our request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where our message relates to us providing you with goods or services or taking steps at our request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process our information in order to do so).

Transfer and storage of our information

[We use a third party email provider to store emails you send us. Our third party email provider is [[insert name of third party email provider] OR [located in [insert country where our third party email provider is located]]. [Their privacy policy is available here: [insert link to our third party email provider's privacy policy].]

[Emails you send us will be stored [within OR outside] the European Economic Area on our [third party email provider's] servers in [insert location (country) where our third party email provider stores our emails (usually where its servers are located)] . For further information please see the section of this privacy policy entitled Transfers of our information outside the European Economic Area.]

Registration form

When you register using our registration form, we collect name, email address, Company. phone number or. If you do not provide the mandatory information required by our registration form, you will not be able to submit the registration form and we will not receive our enquiry.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at our request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where our message relates to us providing you with goods or services or taking steps at our request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process our information in order to do so).

Transfer and storage of our information

Messages you send us via our registration form will be stored within the European Economic Area on our Amazon Web Services servers in Amazon's Republic of Ireland data centre. Their privacy policy is available here: <https://aws.amazon.com/privacy/>.

Phone

When you contact us by phone, we collect our phone number and any information provide to us during our conversation with us.

We do not record phone calls.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at our request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where our message relates to us providing you with goods or services or taking steps at our request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process our information in order to do so).

Transfer and storage of our information

Information about our call, such as our phone number and the date and time of our call, is processed by PLP London Limited

Information about our phone call will be stored by Innov8estate within the European Economic Area. For further information about the safeguards used when our information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of our information outside the European Economic Area.

Post

If you contact us by post, we will collect any information you provide to us in any postal communications you send us.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at our request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where our message relates to us providing you with goods or services or taking steps at our request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process our information in order to do so).

Information we collect when you interact with our website

We collect and use information from individuals who interact with particular features of our website in accordance with this section and the section entitled Disclosure and additional uses of our information.

E-Newsletter

When you sign up for our e-newsletter on our website or opt to receive news, offers from us by registering their name and email address and clicking subscribe or ticking a box at registration indicating that they would like to receive our e-newsletter, we collect the name, company name, telephone number and email address

Legal basis for processing: our consent (Article 6(1)(a) of the General Data Protection Regulation).

Consent: you give our consent to us sending you our e-newsletter by signing up to receive it using the steps described above.

Transfer and storage of our information

We use a third party service to send out our e-newsletter and administer our mailing list, MailChimp. [Their privacy policy is available here: <https://mailchimp.com/legal/privacy/>].

Information you submit to subscribe for our e-newsletter will be stored outside the European Economic Area on our Mailchimp's servers in USA.

Registering on our website

When you register and create an account on our website, we collect the following information: name, email address, company name and telephone number and any other information you provide to us when you complete the registration form.

If you do not provide the mandatory information required by the registration form, you will not be able to register or create an account on our website.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: registering and administering accounts on our website to provide access to content.

Transfer and storage of our information

Information you submit to us via the registration form on our website will be stored within the European Economic Area on our Amazon Web servers in Dublin, Ireland. Their privacy policy is available here: [\[insert link to our third party email provider's privacy policy\]](#).]

[For further information about the safeguards used when our information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of our information outside the European Economic Area.]

Marketing communications

At registration you will have the option of receiving marketing communications from us.

Our similar goods and services

You can opt-out from receiving marketing communications in relation to our goods and which are similar to those which you purchase from us, by ticking a box to opt out in our profile.

We will send you marketing communications in relation to similar goods and services if you do not opt out from receiving them.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: direct marketing and advertising our products and services.]

Our goods and services

You can opt in to receiving marketing communications from us in relation to our goods and services by email, text message, phone, and/or post by ticking a box indicating that you would like to receive such communications on registering.

We will send you marketing communications in relation to our goods and services only if you opt-in to receive them.

Legal basis for processing: consent (Article 6(1)(a) of the General Data Protection Regulation).

Consent: you give our consent to us sending you information about our goods and services by signing up to receive such information in accordance with the steps described above.

Where we receive information about you in error

If we receive information about you from a third party in error and/or we do not have a legal basis for processing that information, we will delete our information.

Information obtained by us from third parties

In certain circumstances for example, to verify the information we hold about you or obtain missing information we require to provide you with a service we will obtain information about you from certain publicly accessible sources, both EU and non-EU, such as the electoral register, Companies House, online customer databases, business directories, media publications, social media, and websites including our own website if you have one.

Profiling

Profiling is any form of automated processing of our information to evaluate personal aspects about you, in particular to analyse or predict things like our performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

Use of profiling for web analytics

Our web analytics service, Google Analytics uses collects information such as our location based on our IP address when you access our website such as the pages you visit and what you click on.

Logic involved: by automatically analysing and categorising information such as the location (based on IP address) as well as the behaviour and devices of visitors to our website, we are able to gain a better understanding of what our website visitors want (in terms of the content of our website and our products), how to improve our website and how to advertise and market our services to them.

[Use of profiling in marketing emails]

[We use [[web beacons] AND/OR [insert other technologies]] in our marketing emails to analyse who opens our emails [and what actions they take (for example, what they click on)]. We will only process information from [[web beacons] AND/OR [insert other technologies you use]] if you have consented to their use in accordance with our cookies policy ([insert link to cookies policy]).

Logic involved: by analysing how our email recipients respond to our emails, we are able to improve the

content and effectiveness of our emails and gauge who is most interested.

Significance and envisaged consequences: our behaviour when you open our emails will be tracked using and including open rates, click through rates.

How to object: you can unsubscribe at anytime by clicking on the 'Unsubscribe' link within the email.

Disclosure and additional uses of our information

This section sets out the circumstances in which will disclose information about you to third parties and any additional purposes for which we use our information.

Disclosure of our information to service providers

We use a number of third parties to provide us with services which are necessary to run our business or to assist us with running our business [and who process our information for us on our behalf]. These include the following:

- Telephone provider(s), including Gradwell which our business uses. **Their privacy policy is available here: [insert link to privacy policy]**
- Email provider(s), including Simply Mail Solutions which our business uses. **Their privacy policy is available here: [insert link to privacy policy]**
- IT service provider(s), including Jigsaw 24 which our business uses. **Their privacy policy is available here: [insert link to privacy policy]**
- Hosting provider(s), including Amazon Web Services, Fasthosts & Godaddy. **Their privacy policy is available here: [insert link to privacy policy]**

Our third party service providers are located in the UK otherwise other service providers are located in Dublin, Ireland.

Our information will be shared with these service providers where necessary to provide you with the service you have requested, whether that is accessing our website or ordering goods and services from us. We do not display the identities of [all of] our service providers publicly by name for security and competitive reasons. If you would like further information about the identities of our service providers, however, please contact us directly by email and we will provide you with such information where you have a legitimate reason for requesting it

Legal basis for processing: legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest relied on: where we share our information with these third parties in a context other than where is necessary to perform a contract (or take steps at our request to do so), we will share our information with such third parties in order to allow us to run and manage our business efficiently.

Legal basis for processing: necessary to perform a contract and/or to take steps at our request prior to entering into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: we may need to share information with our service providers to enable us to perform our obligations under that contract or to take the steps you have requested before we enter into a contract with you.

Sharing our information with third parties, which are either related to or associated with the running of our business, where it is necessary for us to do so. These third parties include our accountants, advisors, independent contractors, and insurers. Further information on each of these third parties is set out below.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: running and managing our business efficiently.

Accountants

We share information with our accountants for tax purposes. For example, we share invoices we issue and

receive with our accountants for the purpose of completing tax returns and our end of year accounts. Our accountants are Pink Accounting. Our accountants are located in [insert location of our accountants e.g. England].

Advisors

Occasionally, we obtain advice from advisors, such as financial advisors, lawyers and public relations professionals. We will share our information with these third parties only where it is necessary to enable these third parties to be able to provide us with the relevant advice.

Independent contractors

Occasionally, we use independent contractors in our business. Our information will be shared with independent contractors only where it is necessary for them to perform the function we have hired them perform in relation to our business.

Insurers

We will share our information with our insurers where it is necessary to do so, for example in relation to a claim or potential claim we receive or make or under our general disclosure obligations under our insurance contract with them.

Disclosure and use of our information for legal reasons

Indicating possible criminal acts or threats to public security to a competent authority

If we suspect that criminal or potential criminal conduct has been occurred, we will in certain circumstances need to contact an appropriate authority, such as the police. This could be the case, for instance, if we suspect that we fraud or a cyber crime has been committed or if we receive threats or malicious communications towards us or third parties.

We will generally only need to process our information for this purpose if you were involved or affected by such an incident in some way.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: preventing crime or suspected criminal activity (such as fraud).

In connection with the enforcement or potential enforcement our legal rights

We will use our information in connection with the enforcement or potential enforcement of our legal rights, including, for example, sharing information with debt collection agencies if you do not pay amounts owed to us when you are contractually obliged to do so. Our legal rights may be contractual (where we have entered into a contract with you) or non-contractual (such as legal rights that we have under copyright law or tort law).

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: enforcing our legal rights and taking steps to enforce our legal rights.

In connection with a legal or potential legal dispute or proceedings

We may need to use our information if we are involved in a dispute with you or a third party for example, either to resolve the dispute or as part of any mediation, arbitration or court resolution or similar process.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s): resolving disputes and potential disputes.

For ongoing compliance with laws, regulations and other legal requirements

We will use and process our information in order to comply with legal obligations to which we are subject. For example, we may need to disclose our information pursuant to a court order or subpoena if we receive

one [or to the National Crime Agency in connection with suspected or potential money laundering matters] .
Legal basis for processing: compliance with a legal obligation (Article 6(1)(c) of the General Data Protection Regulation).

Legal obligation(s): legal obligations to disclose information which are part of the laws of [England and Wales] or if they have been integrated into the United Kingdom's legal framework (for example in the form of an international agreement which the United Kingdom has signed).

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: where the legal obligations are part of the laws of another country and have not been integrated into the United Kingdom's legal framework, we have a legitimate interest in complying with these obligations.

How long we retain our information

This section sets out how long we retain our information. We have set out specific retention periods where possible. Where that has not been possible, we have set out the criteria we use to determine the retention period.

Retention periods

Server log information: we retain information on our server logs for 1 year. Order information: when you place an order for goods and services, we retain that information for six years following the end of the financial year in which you placed our order, in accordance with our legal obligation to keep records for tax purposes.

Correspondence and enquiries: when you make an enquiry or correspond with us for any reason, whether by email or via our registration form or by phone, we will retain our information for as long as it takes to respond to and resolve our enquiry, and for 6 further month(s), after which point we will delete our information.

E-Newsletter: we retain the information you used to sign up for our e-newsletter for as long as you remain subscribed (i.e. you do not unsubscribe) or if we decide to cancel our e-newsletter service, whichever comes earlier.

Criteria for determining retention periods

In any other circumstances, we will retain our information for no longer than necessary, taking into account the following:

- the purpose(s) and use of our information both now and in the future (such as whether it is necessary to continue to store that information in order to continue to perform our obligations under a contract with you or to contact you in the future);
- whether we have any legal obligation to continue to process our information (such as any record-keeping obligations imposed by relevant law or regulation);
- whether we have any legal basis to continue to process our information (such as our consent);
- how valuable our information is (both now and in the future);
- any relevant agreed industry practices on how long information should be retained;
- the levels of risk, cost and liability involved with us continuing to hold the information;
- how hard it is to ensure that the information can be kept up to date and accurate; and
- any relevant surrounding circumstances (such as the nature and status of our relationship with you).]

How we secure our information

We take appropriate technical and organisational measures to secure our information and to protect it against

unauthorised or unlawful use and accidental loss or destruction, including:

- only sharing and providing access to our information to the minimum extent necessary, subject to confidentiality restrictions where appropriate, and on an anonymised basis wherever possible;
- using secure servers to store our information;
- verifying the identity of any individual who requests access to information prior to granting them access to information;
- using Secure Sockets Layer (SSL) software to encrypt any information you submit to us via any forms on our website and any payment transactions you make on or via our website;
- only transferring our information via closed system or encrypted data transfers; and

Transmission of information to us by email

Transmission of information over the internet is not entirely secure, and if you submit any information to us over the internet (whether by email, via our website or any other means), you do so entirely at our own risk. We cannot be responsible for any costs, expenses, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of our decision to transmit information to us by such means.

Our rights in relation to our information

Subject to certain limitations on certain rights, you have the following rights in relation to our information, which you can exercise by writing to PLP London, 7-9 William Road, London, NW1 3ER

- to request access to our information and information related to our use and processing of our information;
- to request the correction or deletion of our information;
- to request that we restrict our use of our information;
- to receive information which you have provided to us in a structured, commonly used and machine-readable format (e.g. a CSV file) and the right to have that information transferred to another data controller (including a third party data controller);
- to object to the processing of our information for certain purposes (for further information, see the section below entitled Our right to object to the processing of our information for certain purposes); and
- to withdraw our consent to our use of our information at any time where we rely on our consent to use or process that information. Please note that if you withdraw our consent, this will not affect the lawfulness of our use and processing of our information on the basis of our consent before the point in time when you withdraw our consent.

Further information on our rights in relation to our personal data as an individual

The above rights are provided in summary form only and certain limitations apply to many of these rights. For further information about our rights in relation to our information, including any limitations which apply, please visit the following pages on the ICO's website:

- <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>; and
- <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

You can also find out further information about our rights, as well as information on any limitations which apply to those rights, by reading the underlying legislation contained in Articles 12 to 22 and 34 of the General Data Protection Regulation, which is available here: http://ec.europa.eu/justice/data-protection/reform/files/regulation_oj_en.pdf

Verifying our identity where you request access to our information

Where you request access to our information, we are required by law to use all reasonable measures to verify our identity before doing so.

These measures are designed to protect our information and to reduce the risk of identity fraud, identity theft or general unauthorised access to our information.

How we verify our identity

Where we possess appropriate information about you on file, we will attempt to verify our identity using that information.

If it is not possible to identify you from such information, or if we have insufficient information about you, we may require original or certified copies of certain documentation in order to be able to verify our identity before we are able to provide you with access to our information.

We will be able to confirm the precise information we require to verify our identity in our specific circumstances if and when you make such a request.

Our right to object to the processing of our information for certain purposes

You have the following rights in relation to our information, which you may exercise in the same way as you may exercise by writing to [insert address] [or sending an email to [insert email address]]:

- to object to us using or processing our information where we use or process it in order to carry out a task in the public interest or for our legitimate interests, including ‘profiling’ (i.e. analysing or predicting our behaviour based on our information) based on any of these purposes; and
- to object to us using or processing our information for direct marketing purposes (including any profiling we engage in that is related to such direct marketing).

You may also exercise our right to object to us using or processing our information for direct marketing purposes by:

- clicking the unsubscribe link contained at the bottom of any marketing email we send to you and following the instructions which appear in our browser following our clicking on that link;
- sending an email to unsubscribe@plplondon.com, asking that we stop sending you marketing communications or by including the words “OPT OUT”.

Sensitive Personal Information

‘Sensitive personal information’ is information about an individual that reveals their racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic information, biometric information for the purpose of uniquely identifying an individual, information concerning health or information concerning a natural person’s sex life or sexual orientation.

We do not knowingly or intentionally collect sensitive personal information from individuals, and you must not submit sensitive personal information to us.

If, however, you inadvertently or intentionally transmit sensitive personal information to us, you will be considered to have explicitly consented to us processing that sensitive personal information under Article 9(2) (a) of the General Data Protection Regulation. We will use and process our sensitive personal information for the purposes of deleting it.

Changes to our Privacy Policy

We update and amend our Privacy Policy from time to time.

Minor changes to our Privacy Policy

Where we make minor changes to our Privacy Policy, we will update our Privacy Policy with a new effective date stated at the beginning of it. Our processing of our information will be governed by the practices set out in that new version of the Privacy Policy from its effective date onwards.

Major changes to our Privacy Policy or the purposes for which we process our information

Where we make major changes to our Privacy Policy or intend to use our information for a new purpose or a different purpose than the purposes for which we originally collected it, we will notify you by email (where possible) or by posting a notice on our website.

We will provide you with the information about the change in question and the purpose and any other relevant information before we use our information for that new purpose.

Wherever required, we will obtain our prior consent before using our information for a purpose that is different from the purposes for which we originally collected it.