

PRIVACY POLICY

We take the privacy of your data seriously and we are committed to ensuring that your privacy is protected. This policy is designed to help you feel more confident about the privacy and security of your information. Please do read it carefully.

This Privacy Policy, our Cookie Policy and our Terms of Use explains how we use any personal information which we may collect about you (**Information**) via this website and/or via any of our mobile web applications (Site) and how we safeguard your privacy.

References to "Ipulse/we/us" means Ipulse.

By submitting your Information and using the website (**Site**), you consent to the collection, storage and processing of your Information in the manner set out in this Privacy Policy.

If you have any questions or queries, please contact us on 020 7287 9991 or email us at partner@ipulseip.com.

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1. ABOUT US

Ipulse is registered trademark and trading name of Ipulse (IP) Partners LLP.

The Data Protection Act 1998 (**DPA**) provides a framework to ensure that personal information is collected and handled properly and gives individuals certain rights to know what information is held about them. More information can be found at www.ico.gov.uk.

Our Site may contain links to third party websites which are not subject to this privacy policy. We recommend that you read the privacy policy of any such sites that you visit (see section 9 for more details).

2. INFORMATION WE MAY COLLECT

Information that you provide voluntarily

We aim only to ask for your Information where this is essential to enable us to comply with your requests. For example, if you wish to receive our newsletter or alerts, you will need to provide us with your email address and a password for security purposes or if you wish to enter into one of our competitions or prize promotions, we will need to collect your name and perhaps your address. Your Information that is essential to comply with your request will be highlighted as a mandatory field and these may vary depending on the activities we are carrying out on our Site or the types of information you wish to receive from us.

The following information may be collected about you when you use our Site:

- 2.1 When you register with our Site, we may request your name, address, e-mail address and/or telephone number etc. This information allows us to contact you and to send you our newsletters and other information/services which you may request from us (see below).

- 2.2 We may also ask you to give us optional contact information, for example your fax number, and demographic information like your age.
- 2.3 You may post information when you interact with our Site (for example when you post reviews or comments).
- 2.4 If you contact us via our Site, we may keep a record of that email or comment.
- 2.5 We may also ask you to complete surveys for research purposes from time to time.
- 2.6 We may ask you if you wish to receive information from third parties. If you are happy for us to share your Information with other service providers, we will ask you to tick the 'opt in' box.
- 2.7 We may also offer you entry to competitions and other promotions on the Site or allow you to register for special events from time to time.

Please note that whilst registration to our Site is entirely voluntary you may be unable to access or use certain parts of that Site if you are not a registered user.

Information collected as you use our Site

- 2.8 Information transmitted by your computer will be collected and stored when you use our Site. This includes your IP address, browser data, traffic and location data and information received from cookies - please see our **Cookie Policy** for more details.
- 2.9 Details relating to your visit to our Site and customer traffic/interaction with the Site may be collected and monitored on an aggregate basis in order to help develop and improve our Site for the benefit of our customers.

3. HOW YOUR INFORMATION WILL BE USED

- 3.1 Your Information may be used in the following ways:
 - 3.1.1 to register you as a user of our Site;
 - 3.1.2 to identify you when you visit our Site, including to assist with logging you in;
 - 3.1.3 to provide service(s) and information to you as a user of our Site and to notify you about changes to services and/or our Site;
 - 3.1.4 to personalise the content you see based on the details given by you at registration and your activity on one or more of our Site;
 - 3.1.5 your IP address may be used to help diagnose problems with servers and to administer the Site;
 - 3.1.6 for the purpose of providing you with information about any of our special offers or features of our Site which may be of interest to you and for related marketing purposes, unless you have withheld your consent for us to do so (e.g. by ticking the relevant boxes (for example on your registration form or in your account preferences), or if you subsequently notify us by email that you no longer wish to receive such messages (see section 7 below);
 - 3.1.7 to ensure that content from our Site is presented in the most effective manner; and
 - 3.1.8 to help administer our Site generally.
- 3.2 We (and/or our Affiliates) may also serve advertisements on our Site which we believe may be of interest to you. These advertisements may be based on certain Information about your visit to our Site. This Information may be collected by placing cookies and other such technologies on your device. Please see our Cookie Policy for more information.

4. **WHO ELSE MAY USE YOUR INFORMATION**

- 4.1 We may share your Information with our Affiliates in order for us to provide products or service(s) to you and for the purposes described in this Privacy Policy.
- 4.2 We do not rent, sell, or share your Information with third parties except to provide products or services you have requested in accordance with your permission, or under the following circumstances:
- 4.2.1 in order to assist us in processing and completing your transaction with us and servicing your account (i.e. to third parties who work with us to provide services e.g. to send our marketing emails etc);
 - 4.2.2 to third parties who may also operate the Site or Site affiliated to the Site (including but not limited to third parties who assist us in the provision of digital content and other related products);
 - 4.2.3 for marketing purposes provided always that you consent to us sharing such data with third parties by notifying us via our Site (e.g. by ticking the relevant box(es) on your registration form) or in other communications with us;
 - 4.2.4 if an Affiliate, or substantially all of its assets, is acquired by a third party, in which case Information held by us about users of our Site may be transferred;
 - 4.2.5 if we are under a duty to disclose or share your Information in order to comply with any legal obligation, or in order to enforce or apply Site terms of use and/or other agreements between you and us; or
 - 4.2.6 to protect our rights, property or safety or other Site users.
- 4.3 We may also allow third party advertisers to serve advertisements on our Site which it believes may be of interest to you (please see section 9). These advertisements may be based on certain information about your visit to our Site. This information may be collected by placing cookies and other such technologies on your device. Please see our **Cookie Policy** for more information. In addition, the third party advertisers may use cookies to help serve the advertisements themselves.
- 4.4 We may provide aggregate statistics about our customers, sales, traffic patterns and related site information to reputable third-parties and to our relevant Affiliates but these statistics will not include personally identifying Information.

5. **HOW LONG WE KEEP YOUR INFORMATION**

We will only retain your Information for the period necessary to comply with your requests and we will delete your Information as soon as practicable after you request that we stop providing you with our information/service. However, if you tick the box that permits us to provide your Information to third parties and you wish those third parties to stop providing you with their information you will need to unsubscribe to their services directly through their website(s). We will not be able to do that for you.

6. **YOUR CONSENT**

- 6.1 By using our Site and submitting Information, you consent to:
- 6.1.1 the collection and use of your Information by us as described in this Privacy Policy;
 - 6.1.2 the sharing of your data with our Affiliates and applicable third parties in accordance with section 4 above.
- 6.2 Because the Internet infrastructure is global, the Information you provide may be transferred outside the European Economic Area (see section 11). By submitting your Information you consent to this

transfer (noting that some countries do not provide the same level of protection for personal data as the UK).

7. **MARKETING AND YOUR ACCOUNT PREFERENCES**

- 7.1 As a user of our Site, you may receive our free email messages based on your preferences and browsing behaviour. If you do not wish to receive these emails you have the option to opt out at any time by amending your email settings. Just log into your account, or click on the "[opt out]" link in the email you receive from us.
- 7.2 You will only receive email marketing communications from us, our Affiliates or third parties if you have consented to this (for example by ticking the relevant box(es) on your registration form) in any communications with us.
- 7.3 You have the right at any time to ask us not to use your Information for marketing purposes. If you do not wish to receive such communications, please email us at partner@ipulseip.com.
- 7.4 If you have any queries about how to use the mailing preference system, please contact our Customer Services department at 020 7287 9991 or email us at partner@ipulseip.com.

8. **SECURITY**

- 8.1 Security is very important to us. Appropriate security measures are in place to protect the confidentiality of your Information whilst it is retained on our servers. We limit access to your Information to those who we believe reasonably need to come into contact with that Information in order to carry out their jobs. We have physical, electronic, and procedural safeguards that comply with our legal obligations to protect your Information.
- 8.2 Your Information may be transferred to data processors such as fulfilment houses but they will only act on our instructions to provide the services required.
- 8.3 Where you have a username/password which enables you to access certain parts of our Site, you are responsible for keeping this username/password confidential and we recommend that you do not share your username/password with anyone. You are responsible for all activity undertaken using your username/password. We recommend that you notify us of any unauthorised use of your username/password.
- 8.4 Whilst we take the security of your Information seriously no data transmission over the Internet or information storage technology can be guaranteed to be 100% secure. This paragraph 8.4 is a summary of the measures we take to protect your Information and descriptions of ways we implement these measures for different types of Information you may provide to us. We continue to evaluate and implement enhancements in security technology and practices, however we can only take steps to help reduce the risks of unauthorised access.

Security steps we have taken:

- 8.4.1 **Secure storage:** we maintain reasonable physical, electronic, and procedural safeguards that comply with all laws and regulations to protect your Information at all times.
- 8.4.2 **Vendors and partners:** we work with our third party vendors and partners to protect the security and privacy of your Information.
- 8.4.3 **Employee and contractor access to your Information:** we limit access to your Information to those employees and contractors who we reasonably believe need to come into contact with that Information to provide products or services to you or in order to do their jobs.
- 8.4.4 **Education and training:** we train our employees and contractors about the security that is required of every employee.
- 8.4.5 **Security steps you can take:** we recommend that you also be cautious about conducting personal or private business online while using an unsecured network. Please ensure that

you do not share your password and choose a password that is not easily identified with you. Be aware of viruses, spyware, sharing your computer and interacting with strangers.

In the event that you believe that your personal safety is at risk or if you believe that you may be the victim of identity theft or other illegal conduct, please contact the appropriate law enforcement agencies directly.

9. **LINKS TO OTHER WEBSITE(S)**

Our Site may contain links to, or advertisements which link to, other websites owned and operated by our Affiliates or by third parties. These websites will have their own policies that will govern any contacts you make on the site and any use of personal information you submit whilst visiting these sites. Please check the policies of the third party websites before contracting with and/or submitting any personal information to the websites. Please also check the privacy policies on our Affiliate's website(s) as these may differ in some respects from our Privacy Policy. We do not accept any responsibility or liability for the policies or the privacy practices of such website(s). No link from our Site to any organisation, company or person shall imply any approval or warranty as to the standing and capability of any such organisations, company or individual on our part. We are not responsible for, and shall not be liable for, the content of any third party advertisements nor the content of any third party websites linked to via this Site. Your use of third party websites is at your own risk.

10. **CONTENT OR POSTINGS YOU ADD TO OUR WEBSITE**

Our Site may include areas which are accessible by the general public and may be indexed by external search engines and displayed in search results. We may offer you the opportunity to post, submit and exchange content and information on these areas. You should exercise caution if you choose to disclose any Information on our Site and you should be aware that this Information may remain indefinitely on our Websites(s). Our other users may also be able to view this Information. You are solely responsible for any personal Information that you disclose and disseminate on our Site. If you have any concern about any of your Information you have posted please email us at partner@ipulseip.com.

11. **TRANSFER OF YOUR INFORMATION**

We may store, process and/or transfer your Information to countries outside of the EEA. Your Information is transferred outside the EEA to our Affiliates and/or to our carefully selected third parties for our data management and business purposes, in particular, for certain outsourced data processing undertaken by third parties on our behalf.

By using our Site and services you consent to our transferring your Information to countries outside the EEA, if necessary, for our legitimate business purposes. We will take reasonable steps to ensure your Information is adequately protected.

12. **UPDATES**

- 12.1 We aim to keep any personal Information we hold up to date, accurate and error free. You can edit your Information, including your marketing preferences at any time. Please help us to keep your Information accurate and up to date by notifying us of any relevant changes in the Information we hold about you by emailing us at partner@ipulseip.com. In your request, please specify which Information is inaccurate, and what corrections you want us to make. You can contact us for these purposes at partner@ipulseip.com
- 12.2 We reserve the right to send you certain communications, such as service announcements and administrative messages and other communications relating to our service, without offering you the opportunity to opt out of receiving them.
- 12.3 You have certain rights to see Information we hold about you. Any request for such Information may be subject to a small fee to meet our costs in providing you with such details. Please email us at partner@ipulseip.com or write to us at CEO, Carrington House, 126-130 Regent Street, London, W1B 5SE if you would like further information on this.

13. **CHILDREN**

We do not contact children under the age of 16 about special offers or for marketing purposes without a parent's permission. We do not ask a child under age 16 for more Information, as a condition of participation, than is reasonably necessary to participate in a given activity or promotion.

14. **CHANGES TO THIS PRIVACY POLICY**

We may amend this Privacy Policy from time to time (including if necessary as a result of development of our Site, changes to technologies, legal or regulatory changes etc). If we change this Privacy Policy we will post the changes on this page so that you will be aware of them. We may also e-mail you should we make any material changes to the Privacy Policy. Your continued use of our Site after any such changes will constitute your acceptance of the updated Privacy Policy. If you do not wish to accept the revised Privacy Policy, you must not use or access (or continue to use or access) our Site. Please do regularly check our Site to determine if the Privacy Policy has been updated and to review those changes before deciding whether or not to access (or continue to access) our Site.

15. **CONTACT US**

Questions, comments and requests regarding this Privacy Policy or our practices relating to use of your Information are very welcome and should be emailed to partner@ipulseip.com.

IMPORTANT: If for any reason you believe your Information has been compromised, please report the incident to us partner@ipulseip.com.