

# Privacy Policy

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## Why a Privacy Policy?

The iHASCO privacy policy (the “Privacy Policy”) is all about letting you know as an iHASCO customer that we take the protection and management of your personal information very seriously. As a UK based business our handling of your information is controlled by the UK Data Protection Act 2018 and the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019. We therefore take great care to protect your personal information or anything which might identify you personally such as:

- Name
- Email address
- Organisation information (e.g. Name, Address, Telephone number)

## How do we collect information about you?

iHASCO offers services which can be purchased via the website and application and can be paid for online or offline. During the purchase process we will require personal and organisation information. iHASCO offers a free trial and quote request function, as well as downloadable resources that can be accessed via the website which require the same personal and organisation information in order to be accessed.

## The personal data we collect

We collect personal data from you when:

- You express an interest in our products and services either over the phone, via email, social media, webforms, webinar attendance, contact us provision, when signing up to newsletters and other communications, when downloading certain content from our website, at events we attend or host or through the live chat on our website.
- If you contact our support team you may be asked for your name, company name and confirmation of security credentials.



- When you make a purchase either through the website or over the phone, we will require financial information for invoicing and collection purposes, this may include bank details, credit card information, invoice name, address and point of contact.
- If you attend an event where we are participating, you may have given additional consent to be contacted by us following the event.
- If you connect with us through a social media channel, we will know your social media handle and any other information including photos you make available through our interactions and your profile.
- If you use our websites or emails we will have details about your usage of our sites through cookies, beacons and similar technologies. This information may include IP addresses and information about your visit. This is also the case when you use our SaaS products.
- If you complete surveys or enter competitions they may require contact information such as name, phone number, email address, company name and job title.
- If you complete a registration form on our website when downloading content we will ask for details such as name, email address, phone number, company name etc...
- When you interact with our live chat function we may need a name and email address for the functionality to work.
- If you are an applicant for a role at iHASCO we will require information relating to your career history which could include name, address, phone number and email address along with the positions you held and the date range you held those positions in different companies along with any qualifications.
- If you visit our office you will be asked to provide your name, signature, company name and car registration number.

## Personal data we collect from other sources

We will also gain personal information from other sources, this includes third parties we purchase or obtain data from to help us identify and grow our business which could include a greater degree of personalisation. Additionally, we may combine these records with other publicly available information to ensure that our records are accurate and up to date.

We also obtain information from other companies within the Citation Group in order to provide a greater level of service and service offering or to better understand clients and



industries we operate in or where synergies apply to our business and to yours. We also obtain information from services to help us comply with data protection laws.

Typically, the personal information we get from third parties includes name, phone number, email address, company name, job title, contact preferences.

### Data from your device, usage of our website and applications

When you access our website or use our SaaS products we use tools such as cookies, beacons and similar technologies to automatically collect information which may contain personal data from your device and usage of our site and services. The nature of what these tools collect differ between website and SaaS product but still fall into similar categories.

This information may include IP address, application or system identification number, browser you are using, pages you have searched, files you have looked at and actions you have taken. There is also the time and date that these actions were taken or associated with your browsing. We use this information to help us improve our service or your experience, to improve how you and others view the site or locations within our applications, to improve functionality, engagement and performance, to help us identify opportunities to develop our services further, our compliance with applicable usage terms and for overall security of Citation products, services and applications. The collection of this type of data may either on its own, or when combined with other data we have become personal data. It will be used primarily to identify the uniqueness of each user for security and identification of user purposes.

### Cookies, beacons and similar technologies on our website and in email communications

Our use of cookies, beacons and similar technologies is to better understand how you interact with our website and email communications.

We use cookies on our websites for a variety of reasons including remembering your settings, load balancing, marketing and analytics. These will be either our cookies or third-party cookies, all of which can be configured by you using the cookie preference centre to configure the settings you are most comfortable with.



We use session cookies which expire after the session is closed, we also use persistent cookies which remain on your computer when you close the browser or turn your computer off. We also use beacons and pixels in our email communications and on our website, this enables us to understand if our communications are useful to you or not and how you then interact with the website or our service as a result of those email communications.

Where we use 3<sup>rd</sup> party cookies such as Google Analytics or third parties we use for advertising purposes we are joint controllers with them, if you do not wish for Google to have your IP address and understand your browsing actions please decline cookies.

The cookies we use fall into four basic categories, they are:

- Strictly necessary - These cookies are necessary for the website to function and cannot be switched off. They are usually only set in response to actions made by you which amount to a request in service, such as setting privacy preferences, logging, or completing a form. You can set your browser to block or alert you about these cookies, but some parts of the site may not work.
- Functional - These cookies enable the website to provide enhanced functionality and personalisation. They may be set by us or by third party providers whose service we may have added to these pages. If you do not allow these cookies, then some or all of these services may not function properly.
- Performance - These cookies allow us to count visits and traffic sources so we can measure and improve our site. This helps us to know which pages are the most and least popular and see how visitors move around the site. All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies, we will not know you have visited our site, and will not be able to monitor its performance.
- Targeting - Targeting cookies may be set through our site by advertising partners. They may be used by those companies to build a profile of your interests and show you relevant adverts on other sites. They do not store directly personal information but are based on unique identifiers in your browser and device. If you do not allow these cookies, you will experience less targeted advertising.



## Social Media

Our website uses social media icons such as Facebook and Twitter logos and other social sharing widgets. By using these features you will be connecting to and sharing information from your browsing session with these organisations. If you are logged into your social media account it is also possible that they will connect your activity on our site to your social media account.

This is also the case if you access our social media pages on a social media platform. The respective social media company may add your interaction to any information they may already have about you or your interests.

In all cases, in that transfer of data the social media provider is a data controller in their own right and responsible for what they do with your personal data. If you want to find out more it is worth accessing their privacy notices.

## How do we use your information?

Information we obtain from you is used to:

- Improve and extend our services
- Respond to your requests for specific services
- Analyse user/purchaser/visitor interactions
- Market additional iHASCO services

## Processing activities that are covered

This notice applies to the processing of personal data collected by us when you:

- Visit our website
- Visit our social media pages
- Visit our offices
- Receive communications such as emails and phone calls



- Register for and/or attend events where we participate or host
- Are an applicant to join iHASCO
- For sales and marketing
- For the understanding, development, growth and administration of our business

Where we use social media or where you click a social media icon on our website, be aware that these companies are independent to Citation, they manage their own affairs and they will be a data controller in their own right. If you have any questions pertaining to how they process your personal data, you should review their privacy notices which will be available on their websites.

## Purpose for processing and the legal bases for processing we rely on

We collect and process personal data for the following purposes and with the following legal bases engaged:

- Where our website is concerned, we are processing your personal data with your consent if it is required and for other elements of our website we are processing based on the legitimate interest to operate and administer the site. Where site security is concerned and the activities through our cookies that enable a secure site, this is administered as a legitimate interest.
- To download some content from our site you are required to complete a form, this is done with your consent. We may also get in touch with you either by email and/or phone as a result of the download.
- The recording of phone calls by default on all calls is done as a legitimate interest in protecting both your interests and iHASCO's. Call recordings are used for security, monitoring and training purposes.
- We may ask you for personal data when dealing with enquiries, this data would be processed as a legitimate interest in being able to effectively follow up on your enquiry. This is also the case where it relates to a service enquiry or complaint, unless of course it is linked to a contractual obligation, this could include service updates and client communications, in which case it is processed as part of the fulfilment of our contract.
- Setting up and managing your journey as a client is again done as part and parcel of the performance of the contract. This is also the case when it comes to good administration of matters relating to your contract with iHASCO.



- Where you use the chatbot or other support functions in our SaaS products you are freely inputting your questions and so consenting to processing. Where we then used pseudonymised data to either train the AI or use it to improve our services we are doing as a legitimate interest. Your reference ID from the chat is also used to provide information specific to your question and may also be a reference point back to your organisation, which could in turn enable us to better tailor services and promotional messages accordingly.
- Managing event registration and administration of the event is done as a legitimate interest in ensuring the efficient administration and follow up of the event. We also rely on legitimate interests to process client contact data for service surveys. If you choose to complete the survey with our partner this is done on the basis of consent.
- Managing your payments and payments relating to the service we provide. This also includes the entirety of the payment process in line with the terms and conditions of our service. We may also from time to time have to escalate this process to a third-party debt collection service. This disclosure of such data would be as a legitimate interest and further processed as part of the contractual terms.
- The identification of opportunities both with prospects and opportunities within our existing client base is done in the furthering the legitimate interests of the business. Any sharing of data internally within Citation Group companies is also a legitimate interest when it is done for similar purposes. This data may also be used to improve user experience and our understanding of both the client journey and appropriateness of products and services at different points of client lifecycle either within iHASCO or across the Citation group.
- Personal advertising on our website is done with your consent when you select 'Accept All Cookies'. Where advertising of our products and services offline is done in the pursuit of our legitimate interest and is done so with prior consent that you have provided.
- Registering your information as a visitor to one of our offices will be done as a legitimate interest to protect our building, business and colleagues. It may also be used to administer non-disclosure and confidentiality agreements.
- If you provided a testimonial of our service, you will be doing so of your own free will and will be retained until you ask us to remove it.
- Where you have applied as a candidate for a role at our company we will process your information in order to progress your application, contact you with updates, assess your qualities and capabilities against the requirements of the role and against other candidates. You will also be asked for proof of qualifications, references and other right to work information such as identification documents. This processing is



done in part as a legitimate interest, in part with your consent and in part as a legal obligation. We may also use recruitment companies from time to time, where data is shared with these organisations we will both be data controllers and you will have been referred to us from them. Further data protection information regarding their activities can be gained from them.

- We may use personal data relating to usage of our SaaS products for reporting and analytical purposes, this is a legitimate interest in trying to improve or offering and further the growth of the business.
- We will send sales and marketing communications such as emails or phone calls related to our services and those services of other companies in the Citation Group only if we can do so in accordance with data protection legislation.
- There are legal obligations that we must comply with, these could be tax related or generally dealing with local or national government, authorities, agencies or courts and professional advisors. It may be in our legitimate interest to protect our rights and if necessary, to disclose information for the protection of these rights or complying with court orders.

## Legal requests for information

iHASCO may be required under court order to provide personally identifiable information to government authorities. Providing such government departments/agencies have legal right to access our records and such enquiries are correctly made, we will supply such authorities with the information they require.

## With whom do we share your information?

We would only share personally identifiable information with third parties not already covered by this notice if:

- you agree to us sharing this information.
- we are forced to bring legal actions against a subscriber who has breached our user agreement.
- we sell, assign or transfer all or part of iHASCO and the services it provides, providing your personal information is sold, assigned or transferred only to the acquirer as part of such a transaction.





- they are providing services to iHASCO. Such third parties are limited in their rights to use such information only for the provision of these services to iHASCO.
- they are affiliates subject to privacy policies that protect your personally identifiable information from disclosure are comparable to this privacy policy.

## How long do we retain your information?

We retain your data for as long as necessary to fulfil the purpose for its collection and processing. In some instances, this may be a short period of time, for instance, as an unsuccessful job applicant we may retain your records for only 6 months once the process has concluded. In other instances, and especially where there is a legal obligation to retain your information for a certain period of time, we will do so in order to comply with the legal requirement; this is typically 6 years.

Once your data is no longer required it shall be deleted or if it is technically not possible to delete, we shall ensure sufficient controls are in place to put it beyond future use.

## Call Privacy

We record all incoming and outgoing calls for contractual and training purposes.

## Your rights

You have various rights in respect of the personal information iHASCO holds about you – these are set out in more detail below. If you wish to exercise any of these rights, you can do so by contacting iHASCO at [www.ihasco.co.uk/contact-us](http://www.ihasco.co.uk/contact-us). Please note that you will need to provide iHASCO with evidence of your identity.

**Request access to your personal information:** You can ask iHASCO to give you a copy of the personal information that iHASCO holds about you.

**Request correction:** You can ask iHASCO to change or complete any inaccurate or incomplete personal information held about you.

**Request erasure:** You can ask iHASCO to delete your personal information where it is no longer necessary for iHASCO to use it, you have withdrawn consent, or where iHASCO has no lawful basis for keeping it.



**Right to object:** You can object to iHASCO processing of your personal information where iHASCO is relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where iHASCO is processing your personal information for direct marketing purposes.

**Request restriction:** You can ask iHASCO to restrict our use of your personal information in the following circumstances: a) if you want us to establish the data's accuracy; (b) where iHASCO's use of the data is unlawful but you do not want iHASCO to erase it; (c) where you need iHASCO to hold the data even if iHASCO no longer require it as you need it to establish, exercise or defend legal claims; or (d) if you have objected to our use of your data but iHASCO needs to verify whether iHASCO has overriding legitimate grounds to use it.

**Request transfer:** You can ask us to provide you or a third party with some of the personal information that iHASCO holds about you in a structured, commonly used, electronic form, so it can be easily transferred.

**Withdraw consent:** If you have given iHASCO your consent to use personal information (for example, for marketing), you can withdraw your consent at any time.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, iHASCO may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

iHASCO tries to respond to all legitimate requests within one month. Occasionally it may take iHASCO longer than a month if your request is particularly complex or you have made a number of requests. In this case, iHASCO will notify you and keep you updated.

## Contact information

If you have any issues with correcting this information in our database or queries concerning this policy please email [support@ihasco.co.uk](mailto:support@ihasco.co.uk) or call us on +44 (0) 1344 867088. We endeavour to respond to all support requests within 24 hrs.

iHASCO tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading, or inappropriate. We would also welcome any suggestions for improving our procedures.



This privacy notice was drafted with brevity and clarity in mind. It may not provide exhaustive detail of all aspects of iHASCO's collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below:

iHASCO Ltd

Unit 2, Bracknell Beeches

Old Lane West

Bracknell

RG12 7BW

Or you can email us at [support@ihasco.co.uk](mailto:support@ihasco.co.uk)

If you want to make a complaint about the way we have processed your personal information, you can contact the Information Commissioner's Office in their capacity as the statutory body which oversees data protection law - [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)

## Policy changes

iHASCO reserves the right to change its privacy policies at any time. Up to date policies are always available on our website.

## Legal Agreement

This Privacy Policy forms part of a legal agreement between you and iHASCO.

You can find the previous version of this policy [here](#).