

IRVINGQ

Privacy Notice

1. INTRODUCTION

- 1.1. This privacy policy sets out how IrvinGQ uses and protects any information that you give IrvinGQ when you use this website. This Policy is intended for clients, prospective clients, suppliers and users of our website. We have a separate privacy notice for Employees and Prospective Employees that can be found at <https://www.irvingq.com/our-story/gdpr/>
- 1.2. For the purpose of UK data protection laws, the data controller is IrvinGQ, Llangeinor, Bridgend, CF32 8PL.

2. POLICY STATEMENT

- 2.1 IrvinGQ is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, you can be assured it will only be used in accordance with this privacy statement.
- 2.2 IrvinGQ may change this policy from time to time by updating this page. You should check this page from time to time to ensure you are happy with any changes. This policy is effective from 24 May 2018.
- 2.3 This Notice has been developed to describe how we handle personal information collected from individuals working for our clients, individual suppliers and individuals working for corporate supplier, persons who use the Airborne website, or who, following an invitation from Airborne in the course of any marketing and/or event communication processes, such as in – person, email, telephone, text messaging direct mail and online, provide personal information to IrvinGQ.

3. PERSONAL AND SENSITIVE PERSONAL DATA

- 3.1 *Personal information* means any information relating to an identified or identifiable natural person; an identifiable person is one who can be directly or indirectly identified by reference to an identifier such as name, an identification number, location data, online identifier or to one or more factors specific to that person.
- 3.2 *Sensitive personal information* is a subset of personal information and is generally defined as any information related to racial /ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health, or other medical information including biometric and genetic data, or sexual life preferences. In some instances, sensitive personal information may also include criminal allegations or convictions.

4. HOW WE OBTAIN PERSONAL DATA

- 4.1 When you visit the IrvinGQ website we collect personal information about your visit. Our web server automatically records details about your visit (for example, your IP address, the type of browser used, the IrvinGQ website pages that you visit and the duration of your visit).
- 4.2 We, by using a tracking code from a third party provider, also collect information on the public IP address of the requesting computer. This tool provides us with information as to the company that has visited our website(s), but individuals cannot be identified by this tool.
- 4.3 In addition, we collect the personal details which you provide online, for example, when you enter personal details (e.g. name, address, email address, phone number) on our website contact page.
- 4.4 We also collect personal information directly from you in the course of sales or purchasing activities and/or in connection with marketing events, for instance: business cards; personal contact details; emails and other social media.
- 4.5 In some circumstances we may collect personal information about you from third parties, such as your employer, or professional organisations to which you belong, or personal information that you have placed in the public domain, such as from Facebook or LinkedIn.
- 4.6 By providing your personal information as described above, or by proceeding with your visit to IrvinGQ websites, you are accepting and consenting to the practices described in this Privacy Notice, and you agree to the transfer, storing or processing of your personal information in the manner described in this Notice.
- 4.7 If you subsequently wish to withdraw your consent to the collection and handling of your personal information, then you may follow the instructions on any communications you receive from us or contact the Data Protection Officer at DPO@irvingq.com
- 4.8 Generally, we do not collect sensitive personal data about our business contacts, save and unless you provide such information to us, for example, limited medical information to facilitate your attendance at an event or a visit to our premises.

5. LINKS TO OTHER WEBSITES

- 5.1 Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

6. COOKIES

6.1 Cookies are small files of letters and numbers. These files are either stored in the memory of your computer or other device such as mobile phones or are placed on the hard drive of your device.

6.2 Our website uses cookies to provide you with an effective browsing experience. You can read more about this in our cookie policy. www.irvingq.com/cookies/

7. USES MADE OF THE INFORMATION COLLECTED AND PROVIDED TO US

7.1 We will use this information for:

- We may use your contact information and preferences to send you newsletters that we may circulate from time to time, news about any events we are organising or participating in, information about us, the products and/or services that IrvinGQ or companies within our Group provide, and/or to respond to any user enquiries.
- If specific personal information is necessary to supply a particular service (e.g. an e-mail address for electronic news updates) then this service is only available to those users who provide this information. It does affect a user's ability to use other parts of the site.
- We use full contact details to create a profile of our users. A 'profile' is stored information we keep on individual users that details their viewing preferences. This profile is used to tailor a user's visit to our site, to improve the content of the site for the user and to direct pertinent marketing promotions to them.
- To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- To improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- As part of our efforts to keep our site safe and secure;
- To allow you to participate in interactive features of our service, when you choose to do so;
- To make suggestions and provide information to you and other users of our site about us and the products and/or services we and other Airborne System Group companies provide.
- We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the information we receive).
- We will only collect and handle your personal information in accordance with your contact preferences. You can also subsequently inform us of your contact preferences, including any request to withdraw your consent to the collection and handling of your personal information by contacting:

The Data Protection Officer, IrvinGQ, Llangeinor, Bridgend, CF32 8PL DPO@irvingq.com

8. SHARING INFORMATION

- 8.1 Although we make every effort to preserve user privacy, we may need to disclose personal information when required by law, including (without limitation) in order to comply with applicable local laws or judicial proceedings, court orders or any other legal processes.
- 8.2 Personal information is also used by companies in the world-wide Group. When we share personal information, we do so in accordance with data privacy and security requirements. All our employees and contractors are required to follow a group data privacy policy when handling personal information.
- 8.3 Your information may be shared under contractual control with other companies who collect and handle personal information on our behalf. For these purposes information may be transferred to other companies located outside the European Economic Area. Any personal information that is transferred will be protected accordance with applicable laws. When we transfer personal information from the European Economic Area to other countries in which applicable laws do not offer the same level of data privacy protection as GDPR, we take measures to provide an appropriate level of data privacy protection.
- 8.4 In some circumstances personal information may be shared with third parties for legal reasons, such as:
- To comply with legal obligations and respond to requests from government agencies, including law enforcement and other public authorities; or
 - In the event of a merger , sale, restructure , acquisition joint venture, assignment, transfer or other disposition of all or any portion of IrvinGQ business assets

9. STORING INFORMATION

- 9.1 IrvinGQ is part of a global organisation, and personal information may be stored and processed outside of the European Economic Area. We take steps to ensure that information we collect is processed according to this Privacy Notice, the requirements of GDPR and other applicable laws.

10. RETAINING INFORMATION

- 10.1 IrvinGQ may be required to use and retain information for legal and compliance reasons, such as the prevention, detection, or investigation of a crime; loss prevention or fraud. We may also use personal information to meet our internal and external audit requirements, information security purposes, and as we otherwise believe to be necessary or appropriate:
- under applicable law;
 - to respond to requests from courts, law enforcement agencies, regulatory agencies and other public and government authorities;
 - to enforce a contract; or

- to protect our rights, privacy, safety or property or those of other persons

11. DATA SECURITY

11.1 We have physical, electronic and administrative security processes in place in our facilities to protect against the loss, misuse, unauthorized access, or alteration of information. Our company uses secure encryption technology (secure socket connection) for all sensitive and financial personal information transmitted on our site.

11.2 Despite this, the transmission of information via the internet is not completely secure and we cannot guarantee the security of your personal information transmitted to our site; any transmission is at your own risk. We do not accept liability for any interception of your personal information that may occur.

12. YOUR RIGHTS

12.1 You have various legal rights in relation to the information you give us, or which we collect about you, as follows:-

- To access the information we hold about you free-of-charge, together with various information about why and how we are using your information, to whom we may have disclosed that information, from where we originally obtained the information and for how long we will use your information.
- To ask us to rectify any information we hold about you that is inaccurate or incomplete.
- To ask us to erase the information we hold about you (the 'right to be forgotten'). Please note that this right can only be exercised in certain circumstances and, if you ask us to erase your information and we are unable to do so, we will explain the reason why.
- To ask us to stop using your information where:-
 - the information we hold about you is inaccurate;
 - we are unlawfully using your information;
 - we no longer need to use the information; or
 - we do not have a legitimate reason to use the information. Please note that we may continue to store your information, or use your information for the purpose of legal proceedings or for protecting the rights of any other person.
- To ask us to transmit the information we hold about you to another person or company in a structured, commonly-used and machine-readable format. Please note that this right can only be exercised in certain circumstances and, if you ask us to transmit your information and we are unable to do so, we will explain why not.
- Where we use/store your information because it is necessary for our legitimate business interests, to object to us using/storing your information. We will stop using/storing your information unless we can demonstrate why we believe we have a legitimate business interest which is more important than your interests, rights and freedoms.

- Where we use/store your data because you have given us your specific, informed and unambiguous consent, you may withdraw your consent at any time.
- To object to us using/storing your information for direct marketing purposes.

12.2 If you wish to exercise any of your legal rights, please contact our Data Protection Officer by writing to the address at the top of this policy, or by emailing us at DPO@irvingq.com

12.3 You also have the right, at any time, to lodge a complaint with the Information Commissioner's Office if you believe we are not complying with the laws and regulations relating to the use/storage of the information you give us, or that we collect about you.

13. OPTING OUT OF RECEIVING MARKETING COMMUNICATIONS

13.1 You can ask us to stop sending you marketing communications at any time by contacting our Marketing Manager, Jessica Cook, by writing to the address at the top of this policy, or by emailing us at jcook@irvingq.com

13.2 If you have any queries in relation to this policy, please write to our data protection officer at the address above or email DPO@irvingq.com