

# Invenias User Privacy Policy

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Invenias Limited (“Invenias”, “we”, “us” or “our”) is committed to protecting the privacy of its Customers and of Users of its products and services. This Policy explains how Invenias collects and uses Personal Information and also outlines the standards by which Invenias will engage in the processing of Personal Information. In the case of Content Data, Invenias acts as processor and processes data on behalf of its Customers and solely subject to their instructions. In the case of Personal Information collected from Users when setting up User Accounts, Invenias acts as data controller in respect of such Personal Information. Where Invenias is data controller it processes Personal Information in a manner consistent with the laws of the countries in which it does business, and has a tradition of upholding the highest ethical and compliance standards in its business practices at all times. Invenias will treat Personal Information as confidential and will only use Personal Information as provided in its terms and conditions for the supply of its services. This Policy shall prevail over any such terms and conditions or other provisions relating to privacy. Please note this Privacy Policy does not apply to Personal Information collected if you visit the Invenias website, please see our [Privacy Notice](#).

## 1. Definitions

There are some key definitions you need know in order to understand the scope of this Policy:

**“Customers”** are prospective and current customers of Invenias.

**“Users”** are any individuals who are permitted by a Customer to access or use Invenias products or services.

**“User Accounts”** are accounts created for Users to access or use Invenias products or services.

**“Content Data”** means any information processed by Invenias on behalf of Customers and as per their instructions for the provision of Invenias products or services and which may include Personal Information.

**“Personal Information”** means any information relating to an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to that person’s physical, physiological, mental, economic, cultural or social identity. Examples of data that may permit this kind of identification include but are not limited to: names and addresses, ID numbers, email accounts, telephone numbers, dates of birth, tax IDs/social security numbers, photographs and mobile phone numbers.

**“Sensitive Information”** is a subset of Personal Information. This specifically concerns Personal Information that contains information relating to a person’s race or ethnic origin, political opinions or religious beliefs, physical or mental health or condition, sexual history or orientation, trade union membership, commission or alleged commission of a criminal offence

and any related legal actions. This Policy also covers Sensitive Information. Data protection legislation imposes additional safeguards for Sensitive Information, for example, tighter obligations around when such data can be collected and the need for explicit consent when collecting and using Sensitive Information. While Invenias aims at minimising the amount of Sensitive Information that it processes, Invenias may process such data in certain circumstances such as when it is obliged by Customer or law to do so.

**“Processing”** means any operation or set of operations performed upon Personal Information, whether or not by automatic means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.

## 2. What information do we collect from you and how do we collect information?

**2.1 Services on behalf of Customers:** Invenias collects Personal Information about Users on behalf of Customers and as per their instructions for the provision of our products and services. Users may provide personal information to Invenias and/or the Customer through the use of Invenias products or services. We recommend Users read Customer’s Privacy Policy before providing any personal information.

Invenias Processes Content Data on behalf of Customers and as per their instructions in the provision of Invenias products and services.

**2.2 Setting up User Accounts:** Invenias collects Personal Information from a User or a Customer to set up a User Account. This may include User’s name, email address, telephone number, LinkedIn profile address and other similar information. If a User holds a User Account with Invenias, User will also have a unique password which enables him/her to access their User Account. Invenias may also collect information about your use of our products and services by using cookies. For details about how we use cookies, please read our Invenias User Cookie Policy.

**2.3 Children's Privacy:** The Invenias products and services are not directed at children under the age of 13. Invenias does not target the products or services to children under 13. Invenias does not knowingly collect personally identifiable information from children under the age of 13. If you are under the age of 13, please do not provide us with any Personal Information.

## 3. How do we use the information we collect?

**3.1 Services on behalf of Customers:** Invenias processes Content Data that is necessary for the provision of our products and services on behalf of Customer.

We may collect anonymized aggregate data, which does not identify any users for research, analysis, testing, monitoring, risk management and administrative purposes.

**3.2 Setting up User Accounts:** Invenias collects Personal Information from Users and Customers in order to open User Accounts. Where permitted by law, we may combine

and crosscheck this information. We may use this information and the combined information for learning more about your preferences as our User, for enhancing your User experience and for providing you with information, content and offerings tailored to your needs.

Invenias may use such Personal Information for direct marketing purposes to provide updates; newsletters; events; or other communications that we think may interest you. Where required by law your prior consent will be obtained before sending direct marketing. In any event, we will offer you the option to unsubscribe on every communication sent.

Invenias will not keep your Personal Information for longer than is necessary. However, please be advised that we may retain some information after your User Account has been closed.

#### **4. Invenias Data Disclosure Practices**

Invenias may share Personal Information with its affiliates, subcontractors and third party suppliers for the purposes of the provision of its products and services. We may also share Personal Information with third parties: (1) in order to facilitate or extend our services; (2) should it be explicitly requested by Customer; (3) if it is required by a court order or any legal or regulatory requirement; (4) in connection with the sale or transfer of the whole of or part of our business; (5) to enforce our Service Terms and Conditions; (6) to ensure the safety and security of our customers, users, consumers and third parties; and (7) to protect our rights and property and the rights and property of our guests and third party suppliers.

Other than as stated above, Invenias does not share, sell or otherwise disclose Personal Information to any other third party entity for purposes unrelated to its business functions without consent.

#### **5. Security and Integrity of Personal Information**

Invenias, as it deems appropriate, employs industry standard security measures designed to protect against unauthorised access, loss, misuse or alteration of Personal Information.

Invenias limits access to Personal Information to those persons in the Invenias organisation, or agents of Invenias, who have a specific business purpose for accessing, maintaining and processing such Personal Information. Invenias will provide such members of staff handling and dealing with the Processing of Personal Information with appropriate training so that any such processing will be carried out in accordance with this Policy and applicable law.

Invenias will obtain assurances from its third party suppliers that they will safeguard Personal Information consistently with this Policy.

## 6. Transferring Information Overseas

### 6.1 Services on behalf of Customers

**Localized Services:** In the provision of localized services, Content Data shall solely be stored on servers in the region or regions selected by the Customer when it purchases Invenias products or services (currently the EEA, US or Hong Kong (Asia), as applicable) ("Region"). Support for Invenias products and services is provided on a follow the sun basis from engineers who may be based outside of the Region in which you are based. You agree to any data transfer that may be deemed to occur as a result of the provision of support services. You should be aware that countries outside your Region may not offer the same level of data protection as your Region, however, we will take all reasonable steps to ensure that your data is treated securely and in accordance with this Policy.

**Global Services:** Customers selecting our Global services or other specified Invenias services should be aware that Content Data will be transferred, stored and/or processed outside of the Region in which you are based. By selecting these services, you agree to this transfer, storing and/or processing. You should be aware that countries outside your Region may not offer the same level of data protection as your Region, however, we will take all reasonable steps to ensure that your data is treated securely and in accordance with this Policy.

**User Accounts:** Users holding a User Account should be aware that it is possible that Personal Information we have collected may be transferred, stored and/or processed outside the Region in which you are based. By submitting your Personal Information, you agree to this transfer, storing and/or Processing. You should be aware that countries outside your region may not offer the same level of data protection as your Region, however, we will take all reasonable steps to ensure that your data is treated securely and in accordance with this Policy.

## 7. User Rights

You have the right to request a copy of the Personal Information which we hold about you.

If you think any of the Personal Information we hold about you is out of date or incorrect, you can ask to have it corrected or removed.

**7.1 Services on behalf of the Customer:** If your request involves Content Data, we advise you to contact the Customer. You may also send your request to us at [legal@invenias.com](mailto:legal@invenias.com) but please note that, as we are solely processing Personal Information on behalf of Customer, we cannot decide if it can be accessed, amended or deleted. If you send us a request concerning Content Data we will send your request to the relevant Customer and will not be able to assist you further.

7.2 **User Accounts:** If your request involves your User Account data, please contact us with any requests at [legal@invenias.com](mailto:legal@invenias.com).

## 8. Compliance

Processing of Personal Information will be conducted in accordance with all data protection laws to the extent applicable.

Invenias will cooperate with the relevant data protection authorities in the investigation and resolution of complaints relating to this Policy. Invenias will seek, as soon as possible, to comply in good faith with the advice of these authorities.

## 9. Changes to this Policy

If it is necessary for us to alter the terms of this Policy, we will post the revised policy on our website. A notice will be posted for 30 days whenever this Policy is changed in a material way.

## 10. How you can contact us

If you have any questions about this privacy policy, please contact us at [legal@invenias.com](mailto:legal@invenias.com) or Invenias Limited, Davidson House, Forbury Square, Reading RG1 3EU, United Kingdom.

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