

## 1. INTRODUCTION AND TERMS

Infinigate HLD UK Limited and its affiliates (“We “or “us”) are committed to protecting and respecting your personal data and privacy. This privacy together with our cookie policy relates to our use of any personal data we collect from you from any of our services. Whenever you provide such information, we are legally obliged to use your information in line with all applicable laws concerning the protection of personal data; including the Data Protection Act 2018 (DPA) and The General Data Protection Regulation 2018 (UK GDPR).

## 2. WHO WE ARE AND HOW TO CONTACT US

- 2.1 For the purpose of the DPA and the UK GDPR, the data controller is Infinigate HLD UK Limited, registered company number 14097651 and data protection registration certificate number ZB630919. If you want to request more information about our privacy policy or information regarding data protection you should contact us using the details provided below:

**FAO: Privacy Officer**

First Floor,  
6-8 Bonhill Street, |  
London,  
United Kingdom,  
EC2A 4BX

Email: [privacyofficer@nuvias.com](mailto:privacyofficer@nuvias.com)

## 3. YOUR RIGHTS

- 3.1 Under the UK GDPR your rights are:
- 3.1.1 The right to be informed – We must make available this privacy notice with the emphasis on transparency over how we process your data.
  - 3.1.2 The right of access – You are entitled to find out what details we may hold about you and why.
  - 3.1.3 The right to rectification – We are obliged to correct or update your details.
  - 3.1.4 The right to erasure – This is also known as the request to be forgotten.
  - 3.1.5 The right to restrict processing – You have the right to ‘block’ or suppress the processing by us of your personal data.
  - 3.1.6 The right to data portability – You have the right to obtain and reuse your personal data that you have provided to us.
  - 3.1.7 The right to object – You have the right to object to us processing your data in relation to direct marketing and or profiling.
  - 3.1.8 Rights in relation to automated decision making and profiling – We do not use automatic decision making or processing.
  - 3.1.9 The right to complain to the Information Commissioner.

## 4. THE DATA WE COLLECT ABOUT YOU

- 4.1 We process both Personal and Sensitive (Special) categories of data. Personal data we process may include name, address and email address. It also may include IP address and cookies (Website). In certain instances (e.g. when we recruit new staff) we also process Sensitive (Special) categories of data, such as health data, racial or ethnical origin and biometric data (passports for identification and verification purposes as required by law).

4.2 Our collection methods are:

- 4.2.1 Through our website or portal
- 4.2.2 Through engagement of our services
- 4.2.3 By communications
- 4.2.4 Networking
- 4.2.5 Through engagement of service providers

Where you have provided us with any information on the basis of consent, you have the right to withdraw such consent at any time.

Where we have requested information for us to perform our contract with you or for compliance with a statute, if you do not provide the information we may not be able to perform our contract with you.

## **5. HOW YOUR DATA WILL BE USED**

5.1 We use information held about you to:

- 5.1.1 ensure that content from our site is presented in the most effective manner for you and for your devices;
- 5.1.2 provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes or on the basis of Legitimate Interests;
- 5.1.3 carry out our obligations arising from any contracts entered into between you and us;
- 5.1.4 allow you to participate in interactive features of our service when you choose to do so, e.g. asking a question through our website or participating in a free prize draw or competition;
- 5.1.5 carry out necessary maintenance to our infrastructure; and
- 5.1.6 notify you about changes to our services; and
- 5.1.7 allow you to access our portal (if applicable).

5.2 We also embrace the use of social media and may wish to process any comments made public by you.

## **6. LEGITIMATE INTEREST & MARKETING**

- 6.1 Where we use Legitimate Interests, we will record our decision and our method on making this decision. This can be requested by you at any time.
- 6.2 If you are an existing contact or customer we will only contact you by postal and electronic means (e-mail) with information about services or goods within the Infinigate Group portfolio. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by post or electronic means only if you have consented to this. You can choose to not receive these types of communication by contacting us.
- 6.3 Our lawful basis for marketing is legitimate interests. We believe it is in your legitimate interests to be provided with tailored information on new products and services which we believe may be of interest to you and it is in our legitimate interests to promote our business. You can unsubscribe from marketing emails at any time.

## 7. THIRD PARTIES

- 7.1 We will keep your information within the Infinigate Group except where disclosure is required or permitted by law or when we use third party service providers or vendors (data processors) to supply and support our services to you. We have contracts in place with our data processors. This means that they cannot do anything with your personal data unless we have instructed them to do so. They will not share your personal data with any organisation apart from us. They will hold it securely and retain it for the period we instruct.
- 7.2 Please see below the list of services where we use third party data processors which sets out the categories of recipients of personal data.

### SERVICE PROVIDERS

- IT Provider – Cloud Service – IT Support – website and portal hosting providers
- Email Provider
- Secure document disposal service
- Marketing delivery service
- HR systems and employee benefit providers
- Storage Facility
- Cleaning service (Offices)
- Government and legislative bodies
- Financial and Insurance

## 8. DATA RETENTION

Our data retention policy is dictated by the DPA/ UK GDPR and is available for inspection by submitting a written request using the contact details provided in this policy.

## 9. TRANSFER OF PERSONAL DATA OVERSEAS

We may transfer your personal data outside of the UK / EEA (where our processors are located in other countries). We will make sure any such transfer is in compliance with Chapter 5 of UK GDPR.

## 10. DATA DELETION

Under UK GDPR you have the right to erasure under specific circumstances. A request for your personal data to be deleted will be decided on a case by case basis and must be submitted in writing to the contact details provided in this policy.

## 11. DATA CORRECTION

We will correct or update your data without delay provided you make the request in writing to the contact details provided in this policy, clearly specifying which data is incorrect or out of date.

## 12. DATA INSPECTION

- 12.1 We strive to be as open as we can be in terms of giving people access to their personal data. Individuals can find out if we hold any of their personal data by making a 'subject access request' under the DPA and 'Right of access' under the UK GDPR. Such requests must be in writing to the contact details provided in this policy. If we do hold your personal data we will respond in writing within one calendar month of your request (where that request was submitted in accordance with this policy and unless such request is complex).

12.2 The information we supply will:

12.2.1 Confirm that your data is being processed;

12.2.2 Verify the lawfulness and the purpose of the processing;

12.2.3 Confirm the categories of personal data being processed;

12.2.4 Confirm the type of recipient to whom the personal data have been or will be disclosed, and

12.2.5 Let you have a copy of the data in an intelligible form.

12.3 Please note that you may need to provide identification in order to prove who you are to access your data.

12.4 In the instance that we do not hold information about you we will also confirm this in writing at the earliest opportunity.

### **13. CHANGES**

We keep our privacy notice under regular review and you should check back regularly to ensure you are aware of changes to it. We may display this notice to you from time to time to help ensure you are aware of its contents.

### **14. COMPLAINTS**

You have the right to complain about the processing of your personal data. Please contact us using the details provided above. If you are still unsatisfied you have the right to complain to the Information Commissioner's Office.