

PRIVACY POLICY

ON COLLECTING, USING, AND SHARING
PERSONAL DATA
CREATED FOR [INFOPOLY.COM](https://infopoly.com) USERS

DOCUMENT SPECIFICATION

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1 Overview

1.1

This Privacy Policy is applicable in all situations involving various forms of contact you may make with Infopoly Limited (below referred to as *Infopoly*), registered in England and Wales. This includes any communication conducted by email, on social media platforms or via our website (*Infopoly.com*), below referred to as *Website*.

This Privacy Policy does not apply to the practices of third parties that we do not own or control, including YouTube or any third party services you access through such third parties we may use. (You can reference their respective privacy policies to learn more about their privacy practices.)

1.2

This Privacy Policy describes how and when we collect, use, and share information when you contact us, or otherwise use our services via our website *Infopoly.com*, as well as how long we store personal information and how to contact us with related requests or enquiries.

1.3

We ourselves act as an administrator of your personal data as described above and we are legally known as Infopoly Limited Registered in England and Wales. Registration No. 12621623, C/O Intouch Accounting Everdene House, Deansleigh Road, Bournemouth, BH7 7DU, UK.

1.4

This Privacy Policy includes information required by and in accordance with the Regulation of the European Parliament and of the Council (EU) 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC (commonly and below referred to as RODO).

1.5

We ensure that the collected data:

- Is processed legally,
- Is processed in your legitimate interest, clearly and exclusively for the disclosed reasons and is not processed any further for any other reasons,
- Is correct (unaltered by us unless specifically asked by you to amend your own mistake) and appropriate to the reasons for which it has been collected and is processed,
- Kept on file no longer than necessary to fulfil the required purpose, unless otherwise agreed directly with the interested individuals.

1.6

The below information has been grouped to account for the following circumstances:

- Ad-hoc contact and/ or response to enquiry;
- Demo booking;
- Free of charge resources related to co-operation;
- Cold mailing;
- Information on your rights.

2 About processing personal information

2.1 Why we process personal data

2.1.1

To successfully communicate with you, e.g. in response to your enquiry or request to book a demo with us, we require you to provide us with certain information (directly via our Website, social media platforms, or through any other platforms that you have previously authorised to share your details with us).

2.1.2

The legal base on which we rely to collect, use, and share any personal information includes either or many of the following reasons:

- Your affirmative consent to use our Website and/ or receive marketing messages,
- Compliance with legal obligations (including demo delivery),
- Our use of the personal information in your legitimate interests (e.g. responding to your enquiries, improving services - please see 2.1.4 below for more details).

2.1.3

We also process any personal information necessary for various forms of contact between yourself and us, in which this Privacy Policy applies and to which you are commonly being referred to, including:

- Communication conducted by email, on social media platforms (e.g. UpWork, LinkedIn), and via our Website.
 - Especially in order to deliver messages containing necessary information or to establish and build positive, honest relationships with interested individuals and parties in our legally justified interest (art. 6 par. 1 lit. f RODO).

- In order to deliver on and fulfil any mutual agreements (including demo delivery and demo booking management), as well as to nurture established relationships in mutual interest.

2.1.4

In order to improve the ways in which our Website serve you as well as to provide you with targeted advertisements or marketing communications, which we believe may be of interest to you, we automatically collect certain information about your device and browsing journey, to which we jointly refer in this Privacy Policy as 'device information'. This includes data about your web browser, IP address, time zone, and some of the cookies that may be installed on your device. As regards your browsing history on our Website, we collect data about the individual web pages and products that you choose to view, the origins of your journey (what websites or search terms referred you to our Website), and information about how you interact with our Website.

For more information about how targeted advertising works, you can visit the Network Advertising Initiative's ("NAI") educational page at <http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>.

2.1.5

Device information is gathered using the following technologies:

- 'Cookies' are data files that are placed on your device or computer and often include an anonymous unique identifier. For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>;
- 'Log files' track actions occurring on the Site, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps;
- 'Web beacons', 'tags', and 'pixels' are electronic files used to record information about how you browse our Website.

2.1.6

Information related to demo bookings (e.g. details about your role and company, your contact details, any demo personalisation details) is collected both when you make a booking or attempt to make it through our Website.

2.1.7

Personal information we typically collect at Infopoly include:

- Name, surname and/ or nickname used for identification of your social media account,
- Email address,
- Phone number,

- Demo booking information (e.g. details about your role and company, your contact details as above, any demo personalisation details)
- If applicable, company details required for invoicing and client's position in the company,
- Communication preferences,
- Preferences related to potential sales/ co-operation meetings
- Device information automatically collected when you browse our Website.

2.1.8

Personal information is processed for the following reasons depending on circumstances:

- Ad-hoc contact including responses to enquiries;
- Demo booking;
- Free of charge resources related to co-operation;
- Cold mailing;
- Providing information about your rights;
- Potential agreements, pursuing claims or defending against them on the basis of our legitimate interest in protecting our rights (art. 6 par. 1 lit. f RODO).

2.2 How long personal information is processed

2.2.1

Personal information is processed for as long as the individual and/ or the company remains our active client, partner or user of our Website (i.e. actively expresses their consent for application of our usage of Cookies and this Privacy Policy by agreeing and closing our Cookie banner on our Website or didn't explicitly withdraw their consent once granted or expressed by emailing us directly with an appropriate request), following which period personal information is processed for a period of time required by law as to stay compliant with it, to pursue potential claims or defending against them, however no longer than 3 years from the day either your contact with us has ceased, or your co-operation agreement with us has expired.

2.2.2

Data processed on the basis of consent will be processed until the consent is withdrawn, with the proviso that the withdrawal of such consent does not affect the compliance of data processing that was carried out before this withdrawal.

2.3 Additional information related to data processing

2.3.1

We may disclose data to other recipients exclusively upon request of entities authorised to do so by law or when it is necessary for successful realisation of the aforementioned purposes (no. 2.1 above).

2.3.2

Personal information may be disclosed to the following parties depending on the purpose for which it is being processed:

- Parties related to Infopoly,
- Parties co-operating with Infopoly,
- Suppliers, in particular parties that deliver and maintain selected IT systems and solutions,
- Law firms.

2.3.3

Personal data processed by us will not be transferred outside the European Economic Area or to international organisations.

2.3.4

Our Website may include embedded content from other websites (for example and especially service-related videos and images). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website. These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website.

3 Rights of those whose personal data is processed

3.1.1

As a person, to whom the personal data being processed belongs, you have the right to:

- Request access to the content of your personal data;
- Request rectification of your data;
- Request removal of your data;
- Request to limit the ways in which your data is being processed;
- Request to transfer your data;
- Not be subject to automated decision making, including profiling;
- Object to data processing based on our legally unjustified interest

- Lodging a complaint to the President of the Office for Personal Data Protection if you think we process your data in a way that violates your rights and freedoms;
- If data processing is based on your consent, to withdraw such consent at any time without affecting the lawfulness of the processing that was made on the basis of this consent before its withdrawal.

3.2

We do not use automated decision-making, including profiling, in our data processing.

3.3

Please note that we do not alter our Website's data collection and use practices when your browser signals Do Not Track to us.

3.4

For any questions or comments related to our processing of personal data, you can contact us by emailing us on contact@infopoly.com.

3.5

You can opt out of targeted advertising by:

- Google - <https://www.google.com/settings/ads/anonymous>;

4 Final provisions

4.1

We reserve the right to make changes to this Privacy Policy, while ensuring that your rights under this document as the data owner are not limited.

4.2

Any meaningful* changes related to this Privacy Policy will be made known to our Website users in a dedicated announcement.

* By *meaningful* we mean changes to the substance of our approach (and in consequence of this document) as opposed to minor editorial changes to this document's content (e.g. wording, grammar).

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