



We've updated our website's **Privacy Policy** and **Terms of use**.

This website uses cookies. Detailed information on the use of cookies and how to manage your preferences can be found in **our Cookie Policy**. By using this website, you consent to the use of cookies.

Privacy Policy

Introduction

At International Protection Services Consulting, we understand the importance of respecting privacy and are committed to protecting your personal data. This privacy notice will inform you how we look after your personal data when you visit our website (regardless of where you see it) and tell you about your privacy rights.

1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how International Protection Services Consulting collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up for our newsletter or purchase a product or service.

This website is not intended for children, and we do not knowingly collect data relating to children.

You must read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you to be fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

CONTROLLER

We have appointed a data privacy manager responsible for overseeing questions about this privacy notice. If you have any questions about this privacy notice, including any requests to exercise *your legal rights*, please contact us.



You have the right to make a complaint at any time to the relevant authority responsible for data protection issues. However, we would appreciate the chance to deal with your concerns before approaching all proper management, so please contact us in the first instance.

YOUR DUTY TO INFORM US OF CHANGES

The personal data we hold about you must be accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which they can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store, and transfer different kinds of personal data about you, which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, and gender.
- **Contact Data** includes billing address, delivery address, email address, and telephone numbers.
- **Financial Data**
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases, or orders made by you, interests, preferences, feedback, and survey responses.
- **Usage Data** includes information about how you use our website, products, and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from our third parties and us and your communication preferences.

We also collect, use, and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data to directly or indirectly identify you, we treat the combined data as personal data, which will be used following this privacy notice.



We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offenses.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, and Financial Data by filling in forms or corresponding with us by post, phone, email, or otherwise. This includes the personal data you provide when you:
 - apply for our products or services;
 - create an account on our website;
 - subscribe to our service or publications;
 - request marketing to be sent to you; or
 - Give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions, and patterns. We collect this personal data by using cookies, server logs, and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our **cookie policy** for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:

- (a) analytics providers such as Google;
- (b) advertising networks;
- (c) social media providers and similar platforms; and
- (d) Search for information providers.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the applicable law allows us to. Most commonly, we will use your personal data in the following circumstances:

- We need to perform the contract we are about to enter into or have entered into with you.



- Where it is necessary for our legitimate interests (or those of a third party), and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than sending third-party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time.

MARKETING

We strive to provide you with choices regarding specific personal data uses, particularly around marketing and advertising. We have established the following individual data control mechanisms:

PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage, and Profile Data to form a view on what we think you may want or need or what may be of interest to you. This is how we decide which products, services, and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you registered for a promotion and/or service, and, in each case, you have not opted out of receiving that marketing.

THIRD-PARTY MARKETING

We will get your express opt-in consent before sharing your personal data with the companies' company for marketing purposes.

OPTING OUT

You can ask third parties or us to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by **contacting us** at any time.

Where you opt-out of receiving these marketing messages, this will not apply to personal data provided to us due to a product/service purchase, warranty registration, product/service experience, or other transactions.

COOKIES

You can set your browser to refuse all or some browser cookies or alert you when websites set or access cookies. Please note that some parts of this website may become inaccessible or not function properly if you disable or refuse cookies. For more information about the cookies we use, please see our **Cookie Policy**.



CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it unless we reasonably consider that we need to use it for another reason, and that reason is compatible with the original purpose.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Service providers are acting on our behalf.
- Regulators and other authorities who require reporting of our activities in certain circumstances
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other companies or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect your personal data security and treat it following the applicable law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and follow our instructions.

6. INTERNATIONAL TRANSFERS

We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented.

7. DATA SECURITY

We have implemented appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorized way, altered, or disclosed. Also, we limit access to your personal data to those employees, agents, contractors, and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put procedures to deal with any suspected personal data breach and notify you and any applicable regulator of a breach where we are legally required to do so.



8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including to satisfy any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data, and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances, you can ask us to delete your data: see below for further information.

In some circumstances, we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws about your personal data, relating to:

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to confirm your identity and ensure your right to access your personal data (or exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information about your request to speed up our response.



TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is incredibly complex or you have made several requests. In this case, we will notify you and keep you updated.

10. GLOSSARY

LAWFUL BASIS

Legitimate interest means our business's interest in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you regarding specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for a contract's account to which you are a party or take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data necessary for compliance with a legal or regulatory obligation that we are subject to.

YOUR LEGAL RIGHTS

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new information you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us to continue to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons, which will notify you, if applicable, at the time of your request.
- **Object to processing** your personal data where we rely on a legitimate interest (or those of a third party), and there is something about your particular situation that makes you want to object to processing on this ground as you feel it impacts your fundamental rights freedoms.

INTERNATIONAL PROTECTION SERVICES Ltd.



You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information, which override your rights and freedoms.

- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the information is unlawful, but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information, which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Changes to the Privacy Policy

International Protection Services reserves the right to modify this Privacy Notice at any time, without prior notice, by posting the amended Privacy Notice on our website, so please review it frequently.