

PRIVACY AND COOKIE POLICY

Innovation Data Processing, Inc. (“**Innovation**”, “**our**”, “**we**”, “**us**”) takes your right to privacy very seriously. This Privacy and Cookie policy (“**Policy**”), aims to give you information on how Innovation collects and processes your personal data when you use <http://www.fdr.com/> (“**Website**”).

This Policy was last updated on May 14th 2018

1. Introduction

When you supply any personal data to Innovation we have legal obligations towards you in the way that we use that data. We must collect the information fairly and explain to you how we will use it. This Policy sets out that information for you.

It is important that you read this Policy together with any other privacy notice or fair processing notice that we may provide at or around the time that we collect or process personal data about you so that you are fully aware of how and why we are using that data. This Policy supplements the other notices and is not intended to override or replace them.

Please note that our Website and any of our services are not intended for children (those aged 13 and under) and we do not knowingly collect data relating to children. Our Website is primarily for the use of contact persons (each a “**Business Partner Contact**”) of our customers, suppliers, vendors and partners (each a “**Business Partner**”).

For ease of reading, we have divided this Policy into several sections:

1. Introduction
2. What information do we collect?
3. How and why do we use/share your information
4. How long do we keep your information for?
5. Security
6. Cookies
7. Your Rights
8. Contact Details

2. What information do we collect?

What is personal data?

Where this Policy refers to ‘personal data’ it is referring to data about you (or other living people) from which you could be identified – such as your name, your date of birth, your contact details and even your IP address.

By law, all organisations are obliged to process your personal data in certain ways and to ensure that you are given an appropriate amount of information about how they use it. You also have various rights to seek information from those organisations about how they are using your data, and to prevent them from processing it unlawfully. For more information about these rights, please see the ‘Your Rights’ section of this Policy.

Data we collect from you when you use our Website

If you provide it to us on our 'Subscribe to news via email' page, we may collect the following information about you:

- Name
- Company name
- Company telephone
- Company address
- E-mail Address

We shall also collect information about you when you visit our Website through cookies. The following are examples of information we may collect:

- Information about your device, browser or operating system
- Your IP address

For more information on this kind of technology, please see the section of this Policy which deals with Cookies.

Updating your information

If you want to update the information you have previously given to us, you can contact Innovation at:

privacy@fdinnovation.com

3. How and why do we use/share your information

Collecting your information

Here are some examples about how we may use the information we collect about you:

- Communicating with you about products, services and projects of Innovation or Business Partners, e.g. by responding to inquiries or requests;
- Planning, performing and managing the (contractual) relationship with Business Partners; e.g. by performing transactions and orders of products or services, and providing support services;
- Administrating and performing customer surveys, marketing campaigns, market analysis;
- Ensuring compliance with legal obligations (such as record keeping obligations), Business Partner compliance screening obligations (to prevent white-collar or money laundering crimes), and Innovation policies or industry standards; and
- Solving disputes, enforce our contractual agreements and to establish, exercise or defend legal claims.

Why is Innovation allowed to use your information in this way?

Innovation will only use your personal data in the following circumstances:

- Where you have asked us to do so or consented to us doing so.
- Where we need to do so in order to perform a contract we have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Sharing your information

We may transfer personal data to other entities within our group, but only if and to the extent such transfer is strictly required for the purposes mentioned above. Such entity may be outside the EEA.

If we do, you can expect a similar degree of protection in respect of your personal data.

Why might Innovation share my personal data with third parties?

If required by law, we will share your personal data with third parties, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Transferring personal data

We will transfer the personal data we collect about you to one of our group companies for Disaster Recovery, Administrative and Business Communications. This may be from our USA entity to an entity in the EEA or vice a versa. Please see a list of our offices <http://www.fdr.com/worldwide-sites.cfm>

To ensure that personal data of any resident in the EU receives an adequate level of protection we have put in place standard contractual clauses endorsed by the European Commission to ensure that your personal data is treated by our USA entity in a way that is consistent with and which respects the EU and UK laws on data protection.

Links to third party sites

Please note that where we provide links to third party websites that are not affiliated with Innovation, such sites are out of our control and are not covered by this Policy. If you access third party sites using the links provided, the operators of these sites may collect information from you that could be used by them, in accordance with their own privacy policies. Please check these policies before you submit any personal data to these websites.

4. How long do we keep your information for?

Unless explicitly indicated otherwise at the time of the collection of Business Partner Contact's personal data (e.g. within a consent form accepted by Business Partner Contact), we erase personal data if the retention of the personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed and no statutory retention obligations under applicable law (e.g. any applicable tax laws) require us to further retain personal data.

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

5. Security

Innovation takes the protection of your information very seriously. We use encryption (SSL) to protect your personal data when appropriate, and all the information provided to Innovation is stored securely once we receive it.

Innovation may store your personal data on secure servers either on our premises or in secure third-party data centres.

6. Cookies

This website uses persistent and session cookies to obtain data regarding visitors' usage of the website and are used to help track your dashboard experience. The persistent cookies do not collect any personally identifying information and are used to provide analytics, campaign tracking, website performance and session preferences.

You have browser controls to block and delete cookies. Your browser and other choices may impact your website experience.

7. Your Rights

Under applicable data protection law an affected Business Partner Contact may - provided that the respective legal pre-conditions are met have the right to:

- obtain from Innovation confirmation as to whether or not personal data concerning the Business Partner Contact are being processed, and where that is the case, access to the personal data;
 - You can exercise this right at any time by writing to us using the contact details set out here and telling us that you are making a subject access request. You do not have to fill in a specific form to make this kind of request.
- obtain from Innovation the rectification of inaccurate personal data or the erasure of such personal data;
 - You can exercise this right at any time by writing to us using the contact details set out here and telling us that you are making a request to have your personal data rectified or erased and on what basis you are making that request. If you want us to replace inaccurate data with new data, you should tell us what that new data is. You do not have to fill in a specific form to make this kind of request.
- obtain from Innovation restriction of processing regarding the Business Partner Contact's personal data;
 - Please note that if for any reason we believe that we have a good legal reason to continue processing personal data that you ask us to stop processing, we will tell you what that reason is, either at the time we first respond to your request or after we have had the opportunity to consider and investigate it.
 - You can exercise this right at any time by writing to us using the contact details set out here and telling us that you are making a request to have us stop processing the relevant aspect of your personal data and describing which of the above conditions you believe is relevant to that request. You do not have to fill in a specific form to make this kind of request.

- obtain from Innovation a copy of personal data, which the Business Partner Contact actively provided, in a structured, commonly used and machine-readable format and to request from Innovation that we transmit those data to another recipient selected by the Business Partner Contact; and
 - You can exercise this right at any time by writing to us using the contact details set out here and telling us that you are making a subject access request. You do not have to fill in a specific form to make this kind of request.

- object, on grounds relating to the Business Partner Contact's particular situation, to processing of personal data.
 - You can exercise this right at any time by writing to us using the contact details set out here and telling us that you are making a subject access request. You do not have to fill in a specific form to make this kind of request.

Exercising your rights

When you write to us making a request to exercise your rights we are entitled to ask you to prove that you are who you say you are. We may ask you to provide copies of relevant ID documents to help us to verify your identity.

It will help us to process your request if you clearly state which right you wish to exercise and, where relevant, why it is that you are exercising it. The clearer and more specific you can be the faster and more efficiently we can deal with your request. If you do not provide us with sufficient information then we may delay actioning your request until you have provided us with additional information (and where this is the case we will tell you).

8. Contact Details

If you have any queries regarding this Policy, or if you think that it has not been followed, please contact:

[privacy](mailto:privacy@fdrinnovation.com) <privacy@fdrinnovation.com>

A list of national data protection authorities is available [here](#).