# **IRIS**

## **IRIS SOFTWARE GROUP – PRIVACY POLICY**

The IRIS Software group of companies ("**IRIS**") or "**we**" (and "**our**" or "**us**" will be construed accordingly) are committed to protecting and respecting your privacy.

This policy (and any other documents referred to on it) is incorporated into (and subordinate to) the terms and conditions governing your use of any IRIS product or service as well as our websites, and sets out the basis on which any personal data we collect from or about you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By using any IRIS product or service (our "**products**") or any IRIS website you are accepting and consenting to the practices described in this policy.

For the purpose of the Data Protection Act 1998 or any replacement or equivalent binding legislation (the "Act"), IRIS Software Group Limited, Riding Court House, Riding Court Road, Datchet SL3 9JT (registered in England and Wales under company number 6295385) is the ultimate data controller in relation to data collected by us from your use of any website and the data processor in relation to providing our customers with IRIS products and services. IRIS will comply with its obligations under the Act as a provider of software and services.

## INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- Information you give us. You may give us information about you by filling in forms we provide to
  you or by corresponding with us by phone, e-mail or otherwise. This includes information you
  provide when you use any of our websites or products and when you report a problem with any of
  the same. The information you give us may include your name, date of birth, signature, address, email address and phone number, financial and credit card information, gender, race or ethnic origin.
- Information we collect about you. With regard to your use of our websites or web-based products we may automatically collect the following information:
  - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
  - information about your visit to our websites or web-based products, including the full Uniform Resource Locators (URL) clickstream to, through and from our websites or webbased products (including date and time); products or services you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

**Information we receive from other sources.** We may also work closely with third parties and we may receive information about you from any of these sources.



## COOKIES

Our websites and web-based products may use cookies to distinguish you from other users. This helps us to provide you with a good experience when you browse our websites or use our web-based products and also allows us to improve them. By continuing to browse our websites or using our web-based products, you are agreeing to our use of cookies.

For further information on cookies generally visit <u>www.aboutcookies.org</u> or <u>www.allaboutcookies.org</u>.

#### INFORMATION ABOUT OUR USE OF COOKIES

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We may use the following cookies:

- Strictly necessary cookies. These are cookies that are required for the operation of our websites and web-based products. They include, for example, cookies that enable you to log into secure areas of our website or web-based products, use a shopping cart or make use of e-billing services.
- **Analytical/performance cookies.** They allow us to recognise and count the number of users and to see how they move around our websites or web-based products when they are using them. This helps us to improve the way our websites and web-based products work.
- **Functionality cookies.** These are used to recognise you when you return to our websites or webbased products. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our websites or web-based products, the areas you have visited and the links you have followed. We will use this information to ensure any advertising displayed is more relevant to your interests. We may also share this information with third parties for this purpose.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie	Name	Purpose	More information
Strictly Necessary Cookies	ASP.Net SessionId	Server cookie which automatically creates a new ID for each user in order to maintain state.	
		These cookies are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website. Without these cookies services you have asked for, like shopping baskets or e-billing, cannot be provided."	



Performance Cookies	utma,utmb,utmc, utmz,utmv	Standard analytics cookie (tracks unique/returning visits + ecommerce)	Used by Google Analytics
	ounz,ounv	These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.	
Functionality Cookie	cookiepref	Stores whether the cookie alert bar has been dismissed These cookies allow the website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. For instance, a website may be able to provide you with local weather reports or traffic news by storing in a cookie the region in which you are currently located. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise, to provide services you have asked for such as watching a video or commenting on a blog. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.	
Targeting or Advertising Cookies	uit, uid, uvc, psc	These cookies are used to deliver adverts more relevant to you and your interests, they are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by advertising networks with the website operator's permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other	Social book marking cookie



pid	organisation.	Twitter cookie to tell Twitter that the tweet button exists on the site and other various Twitter preferences.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our websites or web-based products.

#### USES MADE OF THE INFORMATION

We use information held about you in the following ways:

- Information you give to us. We will use this information:
  - to carry out our obligations arising from your use of our websites or products including any contracts entered into between you and us and to provide you with the information and products that you request from us;
  - to provide you with information similar to that you have browsed and information relating to any products we offer that are similar to those that you have already enquired about or purchased or used before;
  - to provide you, or permit selected third parties to provide you, with information, goods or services we feel may interest you. You will only be contacted by electronic means (e-mail, fax or SMS), with new and updated information that is relevant to our websites or products, and goods and services similar to those which were the subject of a previous sale or the negotiations of a sale to you. Where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data or contact us at <u>privacy@iris.co.uk</u>.
  - to promote the aims, purpose, and quality of our websites and products in the interests of our users;
  - to contact you for market research purposes;



- to notify you about changes to our websites or products;
- to ensure that our websites and products are presented in the most effective manner for you and for your computer.
- Information we collect about you. We will use this information:
  - to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information or products that you request from us;
  - to administer our websites and products and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
  - to improve our websites and products for your use;
  - to allow you to participate in interactive features of our websites or products, when you choose to do so;
  - as part of our efforts to keep our websites and products safe and secure;
  - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
  - to make suggestions and recommendations to you and other users of our websites or products about goods or services that may interest you or them.
- Information we receive from other sources. We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

Please keep in mind that if you disclose personally identifiable information through public message boards or other interactive features on any of our websites or web-based products, such information may be collected and used by third parties.

IRIS does not provide ongoing monitoring of any such message boards or other interactive features, however, we reserve the right to remove any content that we regard in our sole discretion to be inappropriate.

#### DISCLOSURE OF YOUR INFORMATION

We may share your personal information within our group, which means our ultimate holding company Perennial Newco Limited and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We may share your information with selected third parties including:

• Business partners, suppliers, sub-contractors and other third parties for the supply of information to you, or the performance of our obligations to you or any contract we enter into with you.

- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others.
- Analytics and search engine providers that assist us in the improvement and optimisation of our websites and products.
- Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your
  personal data to the prospective seller or buyer of such business or assets and personal data held
  by IRIS about its users may be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply any terms and conditions governing the relationship we have with our customers; or to protect the rights, property, or safety of IRIS, our users, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for one of our suppliers. Such staff may be engaged in, among other things, processing data from your use of our websites or products, the processing of your payment details and the provision of support services. Rest assured that we will always ensure any transfer is subject to appropriate security measures to safeguard your personal data.

If you have been provided with an identification code, password and other information which enables you to access certain parts of our websites or certain products, you are responsible for keeping your identification code, password and such information confidential. You are asked not share your identification code, password or such information with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data where it is transmitted via the internet; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access to it.

## YOUR RIGHTS

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at <a href="mailto:privacy@iris.co.uk">privacy@iris.co.uk</a>.



Our websites and products may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **ACCESS TO INFORMATION**

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

## **CHANGES TO OUR PRIVACY POLICY**

We may change this Privacy Policy from time to time. You should check this Privacy Policy occasionally to ensure you are aware of the most recent version that will apply to you.

## CONTACT

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to <u>privacy@iris.co.uk</u>.