

## Privacy Policy

This Privacy Policy (or Privacy Notice) for IN4.0 Group Limited (also known as IN4 Group or IN4) describes how and why we might collect, store, use, and/or share (**Process**) your information when you use our services (**'Services'**) such as when you:

- Visit our website at [www.in4group.co.uk](http://www.in4group.co.uk), or any website of ours that links to this privacy notice.
- Engage with us in other related ways, including any sales, marketing or events.

**Questions or Concerns?** Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and/or practices, please do not use our services. If you still have any questions or concerns please contact us at [info@in4group.co.uk](mailto:info@in4group.co.uk).

### Summary of Key Points

*This summary provides key points from our privacy policy, but you can find out more details about any of these topics reading further through the privacy policy.*

**What personal information do we process?** When you visit, use or navigate our services, we may process personal information depending on how you interact with IN4 Group and the services, the choices you make, and the products and features you use.

**Do we process any sensitive personal information?** We may process sensitive personal information when necessary with your consent or as otherwise permitted by any relevant laws.

**Do we receive and process any information from third parties?** We may receive information from partners, social media platforms, and other sources outside of our business.

**How do we process your information?** We process your information to provide, improve and administer our services, communicate with you, for security and fraud prevention, and to comply with the law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so.

**In what situations and with which types of parties do we share personal information?** We may share information in specific situations and with specific categories of third parties.

**What are your rights?** Depending on where you are geographically located, the applicable privacy law may mean that you have certain rights regarding your personal data.

**How do you exercise your rights?** The easiest way to exercise your rights is by contacting our team by emailing [info@in4group.co.uk](mailto:info@in4group.co.uk). We will consider and act upon any requests in accordance with applicable data protection laws.

### 1. What information do we collect?

Personal Information that you disclose to us.

*In Short: We collect personal information that you provide to us.*

We collect personal information that you voluntarily provide us with when you register on or with any of our services, when you participate in activities with any of our services, or otherwise when you contact us.

**Personal information provided by you:** The personal information that we collect depends on the context of your interactions with us and the services and the choices you make. The personal information we collect may include the following:

- Names
- Phone numbers
- Email addresses
- Mailing addresses
- Billing addresses
- Job titles
- Contact preferences
- Salary information
- Educational background
- Career History
- Scan, photo or copy of a valid ID
- Proof of address

**Sensitive information:** When necessary, with your consent or as otherwise permitted by law, we process the following categories of sensitive personal data:

- Health Data
- Financial Data
- Information revealing race or ethnic origin
- Information revealing gender
- Student data
- National insurance number and/or other government identifiers

### Information automatically collected

*In short: Some information – such as your Internet Protocol (IP) address and/or browser and device characteristics – is collected automatically when you visit our services.*

We automatically collect certain information when you visit, use, or navigate the services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our services and other technical information. This information is primarily needed to maintain the security and operations of our services, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies. The information we collect includes:

- **Log and Usage Data.** Log and usage data is service-related, diagnostic, usage and performance information our servers automatically collect when you access or use our services and which we record in log files. Depending on how you interact with us, this log data may include you IP address, device information, browser type, and settings and information about your activity in the services (such as the date/time stamps associated with your usage, pages and files viewed, searches and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called “crash dumps”) and hardware settings).
- **Device Data.** We collect Device Data such as information about your computer, phone, tablet, or other device you use to access the services. Depending on the device used, the device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model. Internet service provider and/or mobile carrier, operating system, and system configuration information.
- **Location Data.** We collect location data such as information such as your device’s location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of our services.

### **Information Collected from other sources**

*In short: We may collect limited data from public databases, marketing partners and other outside sources.*

In order to enhance our ability to provide relevant marketing, offers, and services to you and update our records, we may obtain information about you from other sources such as public databases, joint marketing partners, affiliate programmes, data providers, and from other third parties. This information includes mailing addresses, job titles, email addresses, phone numbers, intent data (or user behaviour data) Internet Protocol (IP) addresses, social media profiles, social media URLs, and custom profiles for purposes of targeted advertising and event promotion.

### **2. How do we process your information?**

*In short: We process your information to provide, improve, and administer our services, communicate with you, for security and fraud prevention, and to comply with the law. We may also process your information for other purposes with your consent.*

**We process your personal data for a variety of purposes, depending on how you interact with our services, including:**

**To facilitate registration for our programmes.** We may process your information to provide access to the programme.

**To facilitate talent services for the purposes of recruitment into a role.** We may process your information in relation to our recruitment services.

**To deliver and facilitate delivery of services to the user.** We may process your information to provide you with the requested service(s).

**To respond to user inquiries/offer support to users.** We may process your information to respond to your inquiries and solve any potential issues that you might have with any of our services.

**To send administrative information to you.** We may process your information to send you details about our products and services, changes to our policies and other similar information.

**To enable user-to-user communications.** We may process your information if you choose to use any of our offerings that allow for communication with another user.

**To request feedback.** We may process your information when necessary to request feedback and to contact you about your use of our services.

**To send you marketing and promotional communications.** We may process your information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt out of our marketing emails at any time by emailing us at [info@in4group.co.uk](mailto:info@in4group.co.uk) or clicking the unsubscribe link on any marketing or promotional content that you are sent.

**To deliver targeted advertising to you.** We may process your information to develop and display personalised content and advertising tailored to your interests, location, and more.

**To protect our services.** We may process your information as part of our efforts to keep our services safe and secure, including fraud monitoring and prevention.

**To identify usage trends.** We may process information about how you use our services to better understand how to provide marketing and promotional campaigns that are most relevant to you.

**To save or protect an individual's vital interest.** We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

### **3. What Legal Bases Do We Rely On To Process Your Information?**

*In Short: We only process your personal information when we believe it is necessary and we have a valid reason (i.e. legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfil our contractual obligations, to protect your rights, or to fulfil our legitimate business interests.*

The General Data Protection Regulation (GDPR) and Data Protection Act 2018 (DPA or commonly referred to as UK GDPR) requires us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- **Consent:** We may process your information if you have given us permission (i.e. consent) to use your personal data for specific purposes. You can withdraw your consent at any time.
- **Performance of a contract.** We may process your personal data when we believe it is necessary to fulfil our contractual obligations to you, including providing our services or at your request prior to entering into a contract with you.
- **Legitimate interest.** We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described in order to:
  - Send users information about special offers and discounts on our products and services
  - Develop and display personalised and relevant advertising content for our users
  - Analyse how our services are used so we can improve them to engage and retain users
  - Support our marketing activities
  - Diagnose problems and/or prevent fraudulent activities
  - Understand how our users use our products and services so we can improve user experience
- **Legal Obligations.** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
- **Vital Interests.** We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any persons

#### 4. When And With Whom Do We Share Your Personal Data

*In short: We may share information in specific situations described in this section and/or with the following categories of third parties.*

**Vendors, Consultants, and Other Third-Party Service Providers.** We may share your data with third-party vendors, service providers, contractors, or agents (**Third-Parties**) who perform services for us or on our behalf and require access to such information to do that work. We have contracts in place with our third-parties, which are designed to help safeguard your personal data. 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 also commit to protect the data they hold on our behalf and to retain it for the period we instruct. The categories of third-parties we may share personal information with are as follows:

- Data Analytics Services
- Data Storage Service Provider

- Finance and Accounting Tools
- Government Entities
- Performance Monitoring Tools
- Sales & Marketing Tools
- Social Networks
- Website Hosting Service Providers
- Contractors
- External Agencies

We also may need to share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your data in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honour this privacy policy. Affiliates include any parent company, subsidiaries, joint venture partners, or other companies that we control or under common control with us.
- **Business Partners.** We may share your information with our business partners to offer you certain products, services or promotions.

## 5. Do We Use Cookies And Other Tracking Technologies?

*In Short: We may use cookies and other tracking technologies to collect and store your data.*

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookies Notice, at the end of this Privacy Policy.

## 6. How Long Do We Keep Your Information?

*In short: We keep your data for as long as necessary to fulfil the purposes outlines in this privacy policy unless otherwise required by law. Typically we store data for 5 years unless contractually obliged to do otherwise.*

We will only keep your personal data for 72 months (5 years) due to the nature of our business, unless a longer retention period is required or permitted by law or contractual agreements (such as tax, accounting or other legal requirements). At 72 months (5 years) we will remove all held data that is no longer necessary to store. We may retain a low level of data if you have applied for, or completed a training programme with us or one of our affiliates.

Where data is no longer being used we will endeavour to reduce the scope of data stored without impacting the rights of the individual. Any data that cannot be minimised or deleted then it will be stored securely to isolate it from further processing.

## 7. How Do We Keep Your Information Safe?

*In short: We aim to protect your personal information through a system of organisational and technical security measures.*

We have implemented appropriate and reasonable technical and organisational security measures designed to protect the security of any personal data we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we can not make any promise or guarantee that hackers, cybercriminals, or other unauthorised third-parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal data, transmission of personal data to and from our services is at your own risk. You should only access the services within a secure environment.

## **8. What Are Your Privacy Rights?**

*In short: In regions such as the Europeans Economic Area (EEA) and United Kingdom (UK) you have rights that allow you greater access to control over your personal information. You may review, change or terminate processing, storage or sharing of your data at any time.*

In some regions (like the EEA or UK), you have certain rights under applicable data protection laws. This includes the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure, (iii) to restrict processing of your personal information, and (iv) if applicable to data portability. You also have the right (v) to object to the processing of your personal data or to withdraw consent of the processing of your personal data. You can make such requests by contacting us via email at [info@in4group.co.uk](mailto:info@in4group.co.uk)

We will consider and act upon any request in accordance with any applicable laws.

If you are located in the EEA or UK and you believe we are unlawfully processing your personal data, you also have the right to complain. In the UK, you can do so here: <https://ico.org.uk/make-a-complaint/> or if you are in the EEA, you can find more information on how to make a complaint here: [https://edps.europa.eu/data-protection/our-role-supervisor/complaints\\_en](https://edps.europa.eu/data-protection/our-role-supervisor/complaints_en)

**Withdrawing Consent:** If we are relying on your consent to process your information, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us via email at [info@in4group.co.uk](mailto:info@in4group.co.uk).

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, will it affect the processing of your personal data conducted in reliance on lawful processing grounds other than consent.

**Opting out of marketing and promotional communications:** You can unsubscribe from our marketing and promotional communications at any time by clicking on the unsubscribe link in the emails we send, or by contacting us at [info@in4group.co.uk](mailto:info@in4group.co.uk). You will then be removed from the marketing lists. However, we may still communicate with you – for example, to send you service-

related messages that are necessary for the administration and use of your data to respond to service requests, or for other non-marketing purposes.

#### **9. Controls For Do-Not-Track Features**

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (DNT) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognising and implementing DNT has been finalised. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy policy.

#### **10. Do We Make Updates To This Notice?**

*In short: Yes, we will update this policy as necessary to stay compliant with relevant laws.*

We may update this privacy policy from time to time. The updated version will be indicated by an updated revised date and the updated version will be effective as soon as it is accessible. If we make any material changes to this privacy policy, we may notify you by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed about how we are protecting your data.

#### **11. How Can You Contact Us About This Notice?**

If you have any questions or comments about this notice, you may contact our Data Protection Officer, Matt, by emailing [info@in4group.co.uk](mailto:info@in4group.co.uk), by phone at 0161 686 5770, or by post to:  
FAO Data Protection Officer  
IN4.0 Group Ltd  
HOST Salford  
MediaCityUK  
Salford  
M50 2ST

#### **12. How Can You Review, Update, Or Delete The Data We Collect From You?**

It's simple, simply contact us using the details of the previous section detailing the nature of the request.



## Cookies Policy

We may use technology to track the patterns of behaviour of visitors to our site. This can include using a cookie internet file, a small file that is sent by our web server to your computer, which we can access when you make return visits to our website.

Storing cookies is usual practice for any website that needs to remember what its users' preferences are and we use cookies to keep track of your selections on the website. You can usually modify your browser to prevent this from happening ([www.aboutcookies.org](http://www.aboutcookies.org)) for more information on this. If you choose not to receive cookies, you may still use most of the features on our website, including the ability to purchase items.

In line with the ICC UK Cookie Guide, four types of cookies function online:

### Category 1: strictly necessary cookies

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.

### Category 2: performance cookies

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 do not 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.

### Category 3: functionality cookies

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. They may also be used 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.

**Category 4: targeting cookies or advertising cookies**

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 campaigns. 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 organisation.

Source: [https://www.cookie-law.org/media/1096/icc\\_uk\\_cookiesguide\\_revnov.pdf](https://www.cookie-law.org/media/1096/icc_uk_cookiesguide_revnov.pdf)