



Integrated Visual Protection



Privacy Policy

Issue No. 6



Date of Issue: 1st September 2023

www.ivp.org.uk

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1. Introduction

1.1 Data Protection is of a particularly high priority for the Management of Integrated Visual Protection Limited (IVP).

1.2 The use of the Internet pages of IVP is possible without any indication of personal data; however, if a data subject wants to use contact request services via our website, processing of personal data becomes necessary.

If the processing of personal data is necessary and there is no statutory basis for such processing, we will obtain consent from the data subject.

1.3 The processing of personal data, such as the name, address, e-mail address, or telephone number of a data subject shall always be in line with the General Data Protection Regulation (GDPR), and in accordance with the country-specific data protection regulations where applicable to IVP.

By means of this data protection declaration, our Company would like to inform the general public of the nature, scope, and purpose of the personal data we collect, use and process. Furthermore, data subjects are informed, by means of this data protection declaration, of the rights to which they are entitled.

1.4 As the data controller, IVP has implemented numerous technical and organisational measures to ensure the most complete protection of personal data processed through this website.

However, Internet-based data transmissions may in principle have security gaps, so absolute protection may not be guaranteed. For this reason, every data subject is free to transfer personal data to us via alternative means, e.g. by telephone.

2. Definitions

The data protection declaration of IVP is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation (GDPR).

Our data protection declaration should be legible and understandable for the general public, as well as our customers and business partners.

To ensure this, we would like to begin by explaining the terminology used. In this data protection declaration we use the following terms:

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2.1 Personal Data

Personal data means any information relating to an identified or identifiable natural person (“data subject”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

2.2 Data Subject

Data subject is any identified or identifiable natural person, whose personal data is processed by the data controller responsible for the processing.

2.3 Processing

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

2.4 Restriction of Processing

Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future.

2.5 Profiling

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person’s performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

2.6 Pseudonymisation

Pseudonymisation is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data is not attributed to an identified or identifiable natural person.

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2.7 Data Controller or Controller Responsible for the Processing

Data Controller or controller responsible for the processing is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

2.8 Processor

Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

2.9 Recipient

Recipient is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

2.10 Third Party

Third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2.11 Consent

Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

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3. Name and Address of the Data Controller

- 3.1 The Data Controller for the purposes of the General Data Protection Regulation (GDPR), other data protection laws applicable in Member states of the European Union and other provisions related to data protection this is:

Integrated Visual Protection Limited
 Asset House
 Herringham Road
 Charlton
 London
 SE7 8NJ

Phone: 0871 222 1233

Email: hq@ivp.org.uk

Website: www.ivp.org.uk

3.2 Name and Address of the Data Protection Officer

The Data Protection Officer of the controller is:

Mr Robert K Armitage-Walker
 General Manager
 Integrated Visual Protection Limited
 Asset House
 Herringham Road
 Charlton
 London
 SE7 8NJ

Phone: 020 3746 9999

Email: bob@ivp.org.uk

Website: www.ivp.org.uk

- 3.3 Any data subject may, at any time, contact our Data Protection Officer directly with all questions and suggestions concerning data protection.

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4. Cookies

- 4.1 The Internet pages of IVP use cookies. Cookies are text files that are stored in a computer system via an Internet browser.

Many Internet sites and servers use cookies. Many cookies contain a so-called cookie ID. A cookie ID is a unique identifier of the cookie. It consists of a character string through which Internet pages and servers can be assigned to the specific Internet browser in which the cookie was stored.

This allows visited Internet sites and servers to differentiate the individual browser of the subject from other Internet browsers that contain other cookies. A specific Internet browser can be recognised and identified using the unique cookie ID.

Through the use of cookies, IVP can provide the users of our website with more user-friendly services that would not be possible without the cookie setting.

By means of a cookie, the information and offers on our website can be optimised with the user in mind.

Cookies allow us, as previously mentioned, to recognise our website users. The purpose of this recognition is to make it easier for users to utilise our website. The website user that uses cookies e.g. does not have to enter access data (login credentials) each time the website is accessed, because this is taken over by the website, and the cookie is thus stored on the user's computer system. In other words, it is not necessary to login again every time a new page is requested (a click).

Another example is the cookie of a shopping cart in an online shop. The online store remembers the articles that a customer has placed in the virtual shopping cart via a cookie.

The data subject may, at any time, prevent the setting of cookies through our website by means of a corresponding setting of the Internet browser used, and may thus permanently deny the setting of cookies.

Furthermore, already set cookies may be deleted at any time via an Internet browser or other software programs.

This is possible in all popular Internet browsers. If the data subject deactivates the setting of cookies in the Internet browser used, not all functions of our website may be entirely usable.

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5. Collection of General Data and Information

- 5.1 The website of IVP collects a series of general data and information when a data subject or automated system calls up the website. This general data and information are stored in the server log files. Collected may be (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (so-called referrers), (4) the sub-websites, (5) the date and time (also called timestamp) of access to the Internet site, (6) an Internet protocol address (IP address), (7) the internet service provider (ISP) of the accessing system, and (8) any other similar data and information that may be used in the event of attacks on our information technology systems.
- 5.2 When using these general data and information, IVP does not draw any conclusions about the data subject. Rather, this information is needed to (1) deliver the content of our website correctly, (2) optimise the content of our website as well as its advertisement, (3) ensure the long-term viability of our information technology systems and website technology, and (4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack.

Therefore, IVP analyses anonymously collected data and information statistically, with the aim of increasing the data protection and data security of our enterprise, and to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

6. Registration on Our Website

- 6.1 The data subject has the possibility to register (sign up for services and updates) on the website of the data controller with the indication of personal data.
- 6.2 Which personal data are transmitted to the controller is determined by the respective input mask (sign-up form) used for the registration.
- 6.3 The personal data entered by the data subject are collected and stored exclusively for internal use by the data controller, and for our own purposes.
- 6.4 The controller may request transfer to one or more processors (e.g. a delivery service) that also uses personal data for an internal purposes which is attributable to the controller.

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- 6.5 By registering on the website of the data controller, the IP address—assigned by the internet service provider (ISP) and used by the data subject—date, and time of the registration are also stored.
- 6.6 The storage of this data takes place to prevent the misuse of our services, and, if necessary, to make it possible to investigate committed offences.
- 6.7 Insofar, the storage of this data is necessary to secure the controller. This data is not passed on to third parties unless there is a statutory obligation to pass on the data, or if the transfer serves the aim of criminal prosecution.
- 6.8 The registration of the data subject, with the voluntary indication of personal data, is intended to enable the controller to offer the data subject contents or services that may only be offered to registered users due to the nature of the matter in question.

Registered persons are able to change the personal data specified during the registration at any time, or to have them completely deleted from the data stock of the controller.

- 6.9 The data controller shall, at any time, provide information upon request to each data subject as to what personal data is stored about the data subject.

In addition, the data controller shall correct or erase personal data at the request or indication of the data subject, insofar as there are no statutory storage obligations.

A Data Protection Officer particularly as designated in this data protection declaration, as well as the entirety of the controller's employees are available to the data subject in this respect as contact persons.

7. Subscription to our Publications/Staff Bulletins/Newsletters

- 7.1 On the website of IVP, users are given the opportunity to subscribe to our Company's publications/staff bulletins/newsletters etc. The input mask used for this purpose determines what personal data are transmitted, as well as when the publications/staff bulletins/newsletters are ordered from the controller.
- 7.2 IVP informs its customers and business partners regularly by means of publications/staff bulletins/newsletters about Company information, press releases, offers etc. The Company's publications/staff bulletins/newsletters may only be received by the data subject if (1) the data subject has a valid e-mail address and (2) the data subject registers for the publications/staff bulletins/newsletters shipping.

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- 7.3 A confirmation e-mail will be sent to the e-mail address registered by a data subject for the first time for publications/staff bulletins/newsletters shipping, for legal reasons, in the double opt-in procedure. This confirmation e-mail is used to prove whether the owner of the e-mail address as the data subject is authorised to receive the publications/staff bulletins/newsletters.
- 7.4 During the registration for the publications/staff bulletins/newsletters, we also store the IP address of the computer system assigned by the internet service provider (ISP) and used by the data subject at the time of the registration, as well as the date and time of the registration. The collection of this data is necessary in order to understand the (possible) misuse of the e-mail address of a data subject at a later date, and it therefore serves the aim of the legal protection of the controller.
- 7.5 The personal data collected as part of a registration for the publications/staff bulletins/newsletters will only be used to send these communications. In addition, subscribers to the publications/staff bulletins/newsletters may be informed by e-mail, as long as this is necessary for the operation of the newsletter service or a registration in question, as this could be the case in the event of modifications to the publications/staff bulletins/newsletters or offers, or in the event of a change in technical circumstances.
- 7.6 There will be no transfer of personal data collected by the publications/staff bulletins/newsletters service to third parties. The subscription to our publications/staff bulletins/newsletters may be terminated by the data subject at any time.
- 7.7 The consent to the storage of personal data, which the data subject has given for shipping the publications/staff bulletins/newsletters, may be revoked at any time. For the purpose of revocation of consent, a corresponding link ('unsubscribe') is found in each publication/staff bulletin/newsletter mailing. It is also possible to unsubscribe from the publications/staff bulletins/newsletters at any time directly on the website of the controller, or to communicate this to the controller in a different way.

8. Publications/Staff Bulletins/Newsletters – Tracking

- 8.1 The publications/staff bulletins/newsletters of IVP contain so-called tracking pixels. A tracking pixel is a miniature graphic embedded in such e-mails, which are sent in HTML format to enable log file recording and analysis.
- 8.2 This allows a statistical analysis of the success or failure of online marketing campaigns.

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Based on the embedded tracking pixel, IVP may see if and when an e-mail was opened by a data subject, and which links in the e-mail were called up (clicked on) by data subjects.

- 8.3 Such personal data collected in the tracking pixels contained in the publications/staff bulletins/newsletters are stored and analysed by the controller in order to optimize the shipping of the publications/staff bulletins/newsletters, as well as to continuously adapt the content of future publications/staff bulletins/newsletters to the interests of the data subject.
- 8.4 These personal data will not be passed on to third parties. Data subjects are at any time entitled to revoke the respective separate declaration of consent issued by means of the double-opt-in procedure. After a revocation, these personal data will be deleted by the controller. IVP automatically regards a withdrawal from the receipt of the publications/staff bulletins/newsletters as a revocation.

9. Contact Possibility via the Company Website

- 9.1 The website of IVP contains information that enables a quick electronic contact to the Company, as well as direct communication with us, which also includes a general address of the so-called electronic mail (e-mail address).
- 9.2 If a data subject contacts the controller by e-mail or via a contact form, the personal data transmitted by the data subject are automatically stored. Such personal data transmitted on a voluntary basis by a data subject to the data controller are stored for the purpose of processing or contacting the data subject. There is no transfer of this personal data to third parties.

10. Subscription to Comments in a 'Blog' on the Company Website

- 10.1 In the event that the service is used: The comments made in any 'blog' of IVP may be subscribed to by third parties. In particular, there is the possibility that a commenter subscribes to the comments following his comments on a particular 'blog' post.
- 10.2 If a data subject decides to subscribe to the option, the controller will send an automatic confirmation e-mail to check the double opt-in procedure as to whether the owner of the specified e-mail address decided in favour of this option. The option to subscribe to comments may be terminated at any time.

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11. Routine Erasure and Blocking of Personal Data

- 11.1 The data controller shall process and store the personal data of the data subject only for the period necessary to achieve the purpose of storage, or as far as this is granted by the European legislator or other legislators in laws or regulations to which the controller is subject to.
- 11.2 If the storage purpose is not applicable, or if a storage period prescribed by the European legislator or another competent legislator expires, the personal data are routinely blocked or erased in accordance with legal requirements.

12. Rights of the Data Subject

12.1 Right of Confirmation

Each data subject shall have the right granted by the European legislator to obtain from the controller the confirmation as to whether or not personal data concerning him or her are being processed. If a data subject wishes to avail themselves of this right of confirmation, he or she may, at any time, contact our Data Protection Officer.

12.2 Right of Access

Each data subject shall have the right granted by the European legislator to obtain from the controller free information about his or her personal data stored at any time and a copy of this information. Furthermore, directives and regulations grant the data subject access to the following information:

- ❖ the purposes of the processing;
- ❖ the categories of personal data concerned;
- ❖ the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- ❖ where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- ❖ the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing;
- ❖ the existence of the right to lodge a complaint with a supervisory authority;
- ❖ where the personal data are not collected from the data subject, any available information as to their source;

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- ❖ the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.

Furthermore, the data subject shall have a right to obtain information as to whether personal data is transferred to another country or to an international organisation.

Where this is the case, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer.

If a data subject wishes to avail himself of this right of access, he or she may at any time contact our Data Protection Officer.

12.3 Right to Rectification

Each data subject shall have the right granted by the European legislator to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her.

Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

If a data subject wishes to exercise this right to rectification, he or she may, at any time, contact our Data Protection Officer.

12.4 Right to Erasure (Right to be Forgotten)

Each data subject shall have the right granted by the European legislator to obtain from the controller the erasure of personal data concerning him or her without undue delay, and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies, as long as the processing is not necessary:

- ❖ The personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- ❖ The data subject withdraws consent to which the processing is based according to point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing.

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- ❖ The data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR.
- ❖ The personal data has been unlawfully processed.
- ❖ The personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.
- ❖ The personal data has been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

If one of the aforementioned reasons applies, and a data subject wishes to request the erasure of personal data stored by IVP, he or she may at any time contact our Data Protection Officer.

The Data Protection Officer of IVP shall promptly ensure that the erasure request is complied with immediately.

Where the controller has made personal data public and is obliged pursuant to Article 17(1) to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other controllers processing the personal data that the data subject has requested erasure by such controllers of any links to, or copy or replication of, those personal data, as far as processing is not required.

The Data Protection Officer of IVP will arrange the necessary measures in individual cases.

12.5 Right of Restriction of Processing

Each data subject shall have the right granted by the European legislator to obtain from the controller restriction of processing where one of the following applies:

- ❖ The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data.
- ❖ The processing is unlawful and the data subject opposes the erasure of the personal data and requests instead the restriction of their use instead.
- ❖ The controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.

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- ❖ The data subject has objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

If one of the aforementioned conditions is met, and a data subject wishes to request the restriction of the processing of personal data stored by IVP, he or she may at any time contact our Data Protection Officer.

The Data Protection Officer of IVP will arrange the restriction of the processing.

12.6 Right to Data Portability

Each data subject shall have the right granted by the European legislator, to receive the personal data concerning him or her, which was provided to a controller, in a structured, commonly used and machine-readable format.

He or she shall have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, as long as the processing is based on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Furthermore, in exercising his or her right to data portability pursuant to Article 20(1) of the GDPR, the data subject shall have the right to have personal data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others.

In order to assert the right to data portability, the data subject may at any time contact the Data Protection Officer designated by IVP.

12.7 Right to Object

Each data subject shall have the right granted by the European legislator to object, on grounds relating to his or her particular situation, at any time, to processing of personal data concerning him or her, which is based on point (e) or (f) of Article 6(1) of the GDPR.

This also applies to profiling based on these provisions.

IVP shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the

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interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

If IVP processes personal data for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing.

This applies to profiling to the extent that it is related to such direct marketing. If the data subject objects to IVP to the processing for direct marketing purposes, IVP will no longer process the personal data for these purposes.

In addition, the data subject has the right, on grounds relating to his or her particular situation, to object to processing of personal data concerning him or her by IVP for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) of the GDPR, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

In order to exercise the right to object, the data subject may directly contact the Data Protection Officer of IVP.

In addition, the data subject is free in the context of the use of information society services, and notwithstanding Directive 2002/58/EC, to use his or her right to object by automated means using technical specifications.

12.8 Automated Individual Decision-Making, Including Profiling

Each data subject shall have the right granted by the European legislator not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) is not authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or (3) is not based on the data subject's explicit consent.

If the decision (1) is necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) it is based on the data subject's explicit consent, IVP shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human

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intervention on the part of the controller, to express his or her point of view and contest the decision.

If the data subject wishes to exercise the rights concerning automated individual decision-making, he or she may at any time directly contact our Data Protection Officer of IVP.

12.9 Right to Withdraw Data Protection Consent

Each data subject shall have the right granted by the European legislator to withdraw his or her consent to processing of his or her personal data at any time.

If the data subject wishes to exercise the right to withdraw the consent, he or she may at any time directly contact our Data Protection Officer of IVP.

13. Data Protection Provisions about the Application and use of Facebook

- 13.1 A social network is a place for social meetings on the Internet, an online community, which usually allows users to communicate with each other and interact in a virtual space.
- 13.2 A social network may serve as a platform for the exchange of opinions and experiences, or enable the Internet community to provide personal or business-related information.
- 13.3 Facebook allows social network users to include the creation of private profiles, upload photos, and network through friend requests.
- 13.4 The operating company of Facebook is "Facebook, Inc., 1 Hacker Way, Menlo Park, CA 94025, United States". If a person lives outside of the United States or Canada, the controller is "Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland".
- 13.5 With each call-up to one of the individual pages of this Internet website, which is operated by the controller and into which a Facebook component (Facebook plug-in or link) was integrated, the web browser on the information technology system of the data subject is automatically prompted to download display of the corresponding Facebook component from Facebook through the Facebook component.
- 13.6 An overview of all the Facebook Plug-ins may be accessed under <https://developers.facebook.com/docs/plugins/>.

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- 13.7 During the course of this technical procedure, Facebook is made aware of what specific sub-site of our website was visited by the data subject.
- 13.8 If the data subject is logged in at the same time on Facebook, Facebook detects with every call-up to our website by the data subject—and for the entire duration of their stay on our Internet site—which specific sub-site of our Internet page was visited by the data subject.
- 13.9 This information is collected through the Facebook component and associated with the respective Facebook account of the data subject.
- 13.10 If the data subject clicks on one of the Facebook buttons integrated into our website, e.g. the “Like” button, or if the data subject submits a comment, then Facebook matches this information with the personal Facebook user account of the data subject and stores the personal data.
- 13.11 Facebook always receives, through the Facebook component, information about a visit to our website by the data subject, whenever the data subject is logged in at the same time on Facebook during the time of the call-up to our website.
- This occurs regardless of whether the data subject clicks on the Facebook component or not. If such a transmission of information to Facebook is not desirable for the data subject, then he or she may prevent this by logging off from their Facebook account before a call-up to our website is made.
- 13.12 The data protection guideline published by Facebook, which is available at <https://facebook.com/about/privacy/>, provides information about the collection, processing and use of personal data by Facebook.

In addition, it is explained there what setting options Facebook offers to protect the privacy of the data subject. In addition, different configuration options are made available to allow the elimination of data transmission to Facebook, e.g. the Facebook blocker of the provider Webgraph, which may be obtained under <http://webgraph.com/resources/facebookblocker/>. These applications may be used by the data subject to eliminate a data transmission to Facebook.

14. Data Protection Provisions about the Application and use of Google Analytics

- 14.1 The controller has integrated the component of Google Analytics on the IVP website.

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14.2 It should also be noted that the controller cannot state that Google Analytics are not already being used by the data subject's own software or browser that may show the subject's history including visits to the IVP website.

14.3 Google Analytics is a web analytics service. Web analytics is the collection, gathering, and analysis of data about the behaviour of visitors to websites. A web analysis service collects, inter alia, data about the website from which a person has come (the so-called referrer), which sub-pages were visited, or how often and for what duration a sub-page was viewed. Web analytics are mainly used for the optimisation of a website and in order to carry out a cost-benefit analysis of Internet advertising.

14.4 The operator of the Google Analytics component is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, United States.

15. Data Protection Provisions about the Application and use of Google Remarketing

15.1 The controller has not integrated the component of Google Remarketing services on the IVP website.

15.2 Google Remarketing is a feature of Google AdWords, which allows a Company to display advertising to Internet users who have previously resided on the Company's Internet site. The integration of Google Remarketing therefore allows a Company to create user-based advertising and thus shows relevant advertisements to interested Internet users.

15.3 The operating company of the Google Remarketing services is the Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, United States.

16. Data Protection Provisions about the Application and use of Google-AdWords

16.1 The controller has not integrated the component of Google AdWords on the IVP website.

16.2 Google AdWords is a service for Internet advertising that allows the advertiser to place ads in Google search engine results and the Google advertising network.

Google AdWords allows an advertiser to pre-define specific keywords with the help of which an ad on Google's search results only then displayed, when the user utilises the search engine to retrieve a keyword-relevant search result.

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In the Google Advertising Network, the ads are distributed on relevant web pages using an automatic algorithm, taking into account the previously defined keywords.

- 16.3 The operating company of Google AdWords is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, UNITED STATES.

17. Data Protection Provisions about the application and use of LinkedIn

- 17.1 The controller has integrated components of the LinkedIn Corporation on the IVP website. LinkedIn is a web-based social network that enables users with existing business contacts to connect and to make new business contacts. LinkedIn is currently the largest platform for business contacts and one of the most visited websites in the world.
- 17.2 The operating company of LinkedIn is LinkedIn Corporation, 2029 Stierlin Court Mountain View, CA 94043, UNITED STATES. For privacy matters outside of the UNITED STATES. LinkedIn Ireland, Privacy Policy Issues, Wilton Plaza, Wilton Place, Dublin 2, Ireland, is responsible.
- 17.3 With each selection of the LinkedIn link on the IVP website, which is operated by the controller and on which a LinkedIn component (LinkedIn plug-in) was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to the download of a display of the corresponding LinkedIn component or page of LinkedIn.
- 17.4 Further information about the LinkedIn plug-in may be accessed under <https://developer.linkedin.com/plugins>. During the course of this technical procedure, LinkedIn gains knowledge of what specific sub-page of our website was visited by the data subject.
- 17.5 LinkedIn receives information via the LinkedIn domain. This occurs regardless of whether the person clicks on the LinkedIn button on the IVP website or not when they visit the LinkedIn website.
- 17.6 The applicable data protection provisions of LinkedIn may be accessed under <https://www.linkedin.com/legal/privacy-policy?trk=uno-reg-guest-home-privacy-policy>

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18. Data Protection Provisions about the Application and use of Twitter

- 18.1 The controller has integrated components of Twitter onto the IVP website. Twitter messages (tweets) are available for everyone, including those who are not logged on to Twitter. The tweets are also displayed to so-called followers of the respective user. Followers are other Twitter users who follow a user's tweets. Furthermore, Twitter allows you to address a wide audience via hashtags, links or retweets.
- 18.2 The operating company of Twitter is Twitter, Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, UNITED STATES.
- 18.3 With each selection of the Twitter link on the IVP website, which is operated by the controller and on which a Twitter component (Twitter button) was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to download a display of the corresponding Twitter component of Twitter.
- 18.4 Further information about the Twitter buttons is available under <https://about.twitter.com/de/resources/buttons>. During the course of this technical procedure, Twitter gains knowledge of what specific sub-page of our website was visited by the data subject.
- 18.5 Twitter receives information via the Twitter domain. This occurs regardless of whether the person clicks on the Twitter button on the IVP website or not when they visit the Twitter website.
- 18.6 The applicable data protection provisions of Twitter may be accessed under <https://twitter.com/privacy?lang=en>.

19. Data Protection Provisions about the Application and use of the IVP Website

- 19.1 IVP's Registered Office is: Asset House, Herringham Road, Charlton, London, SE7 8NJ.
- 19.2 IVP uses a tracking pixel on its website, this is a miniature graphic embedded in a web page to enable log file recording and log file analysis to subsequently perform a statistical analysis.
- 19.3 IVP also sets a cookie on the information technology system of the data subject. The definition of cookies is explained above. The setting of the cookie enables us to analyse the usage of our website.

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- 19.4 Using the data obtained, usage profiles are created. The usage profiles are used for the purpose of analysing visitor behaviour and enabling an improvement of our Internet offer.
- 19.5 Data collected through the cookie component are not used to identify the data subject without first obtaining a separate and explicit consent from the data subject. This data will not be merged with personal data or with other data which contains the same usage profile. By default, IVP identifies the companies, not the individuals, who are accessing the website, and presents firmographic information. Personal information is only collected and stored based on the opt-in preferences of the individual data subjects.
- 19.6 With each visit to one of the individual pages of the IVP website, the Internet browser on the information technology system of the data subject is programmatically requested to submit data for the purpose of online analysis to the cookie component.
- 19.7 During the course of this technical procedure, IVP gains knowledge of visitor information, such as the requesting IP address, which also serves to understand the origin of visitors and clicks.
- 19.8 The cookie is used to store anonymised information, such as the access time, and the frequency of visits to the IVP website. With each visit of our Internet pages, this visitor data, including the IP address of the Internet access used by the data subject, are logged and stored by the IVP server.
- 19.9 The data subject may prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used also prevents IVP from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by IVP may be deleted at any time via a web browser or other software programs.
- 19.10 The personal data transmitted to IVP by the data subject undertaking the registration process is usually first name, last name, email address, telephone number, mobile phone number, or other data as required by the data subjects express choices during the registration process.

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20. Legal Basis for the Processing

20.1 Art. 6(1) lit a: GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose.

20.2 If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the case, for example, when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on Article 6(1) lit. b GDPR.

The same applies to such processing operations which are necessary for carrying out pre-contractual measures, for example in the case of inquiries concerning our products or services.

20.3 If IVP is subject to a legal obligation by which processing of personal data is required, such as for the fulfilment of tax obligations, the processing is based on Art. 6(1) lit. c GDPR.

20.4 In rare cases, the processing of personal data may be necessary to protect the vital interests of the data subject or of another natural person.

This would be the case, for example, if a visitor were injured on our Company premises and their name, address, age or other vital information would have to be passed on to a medical practitioner, hospital or other third party. Then the processing would be based on Art. 6(1) lit. d GDPR.

20.5 Finally, processing operations could be based on Article 6(1) lit. f GDPR. This legal basis is used for processing operations which are not covered by any of the abovementioned legal grounds, if processing is necessary for the purposes of the legitimate interests pursued by IVP or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

20.6 Such processing operations are particularly permissible because they have been specifically mentioned by the European legislator. They considered that a legitimate interest could be assumed if the data subject is a client/customer of the controller (Recital 47 Sentence 2 GDPR).

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21. The Legitimate Interests Pursued by the Controller or by a Third Party

- 21.1 Where the processing of personal data is based on Article 6(1) lit. f GDPR our legitimate interest is to carry out the business of the Company in favour of the well-being of all our employees and/or other stakeholders.

22. Period for which the Personal Data will be Stored

- 22.1 The criteria used to determine the period of storage of personal data is the respective statutory retention period as defined in the Administration Operations Process Manual – Tier 2.

After expiration of that period, the corresponding data is routinely deleted, as long as it is no longer necessary for the fulfilment of the contract or the initiation of a contract.

23. Provision of personal data as statutory or contractual requirement; Requirement necessary to enter into a contract; Obligation of the data subject to provide the personal data; possible consequences of failure to provide such data

- 23.1 IVP clarifies that the provision of personal data may be partly required by law (e.g. tax regulations) or can also result from contractual provisions (e.g. information on the contractual partner).

Sometimes it may be necessary to conclude a contract that the data subject provides us with personal data, which must subsequently be processed by us. The data subject is, for example, obliged to provide us with personal data when our company signs a contract with him or her.

The non-provision of the personal data would have the consequence that the contract with the data subject could not be concluded.

Before personal data is provided by the data subject, the data subject must contact our Data Protection Officer. Our Data Protection Officer clarifies to the data subject whether the provision of the personal data is required by law or contract or is necessary for the conclusion of the contract, whether there is an obligation to provide the personal data and the consequences of non-provision of the personal data.

24. Existence of Automated Decision-making

As a responsible Company, we do not use automatic decision-making or profiling.

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25. Changes to our Privacy Policy

IVP may from time to time change this Policy or change, modify or withdraw access to our website at any time with or without notice.

26. Monitoring

Compliance with the policies and procedures laid down by the Company are monitored by the Senior Executive Board, together with reviews by both Internal and External Auditors.

The General Manager is responsible for the monitoring, revision and updating of this policy document on a yearly basis or sooner if the need arises.

27. Equality Impact Assessment

This document forms part of IVP Limited's commitment to create a positive culture of respect for all employees, other workers and service users.

The intention is for IVP Limited to identify, remove or minimise discriminatory practice in relation to the protected characteristics (race, disability, gender, sexual orientation, age, religious or other belief, marriage and civil partnership, gender reassignment and pregnancy and maternity), as well as to promote positive practice and value the diversity of all individuals and the communities in which we provide services.

As part of its development this Policy Document and its impact on equality has been analysed and no detriment has been identified.

28. Director's Acceptance & Approval

Signed For and on Behalf of Integrated Visual Protection Limited:

Signed: 

 Managing Director

Dated: 1st September 2023