

## **OVERVIEW**

Invisible Vision Ltd. [henceforth 'IVV'] is a UK registered company specializing in the design and manufacture of advanced scientific research imaging solutions for the global academic, scientific and industrial research base. Our customers are normally Universities, government national research institutions and large corporate industrial concerns. Invisible Vision is committed to protecting and respecting the privacy of the personal information that we receive and use to provide and offer such services

This document [henceforth 'Notice'] describes how we look after personal information either as a customer, supplier or staff member to IVV. It describes how we collect, use, safeguard and share information received through this site and in the course of our business, as well as your choices regarding your personal information.

The Notice also demonstrates our compliance with the EU's General Data Protection Regulation (GDPR) that became effective from 25th May 2018.

## **1. INTRODUCTION**

**1.1.** IVV only processes personal data for:

- Staff administration (including payroll)
- Accounts and record keeping (i.e. invoices and payments and other legal compliances)
- Advertising, marketing, and public relations in connection with our own business activity.

These are defined as Core Business Activities [henceforth 'CBA'] and we are therefore not required to register as either a Data Controller or Data Processor with the UK Independent Commissioner's Office (ICO).

**1.2.** This Notice will also inform you how we look after your personal data when you visit our website (regardless of where you visit it from). IVV's website may also include links to third-party websites (i.e. our global network of sales representatives), potentially plug-ins and applications. Clicking on these links or enabling those connections may allow third parties to collect or share data about you. IVV does not control these third-party websites and is not responsible for their privacy statements.

**1.3.** IVV's website is not intended for children, nor do we knowingly collect data relating to children.

**1.4.** The notice explains how IVV collects and uses information in the course of its core business activities. We reserve the right to update this notice to reflect evolving circumstances or legal requirements (see Section 3).

- *What data do we collect?*
- *How do we collect your data?*
- *How will we use your data?*
- *What information do we collect?*
- *How do we use your information and what is the legal basis that permits us to do this?*
- *What happens if you do not provide information that we request?*
- *How do we share your information?*
- *How do we Store your data and keep it secure?*
- *When do we transfer your information overseas?*
- *For how long do we keep your information?*
- *Marketing*
- *Your rights in relation to your information*

**1.5.** The table (Appendix) at the end of this notice provides an overview of the data that we collect, the purposes for which we use that data, the legal basis which permits us to use your information and the rights that you have in relation to your information.

**1.6.** We have an appointed Data Protection Officer (DPO).

You can contact the DPO using the following details.

Email Address:	<a href="mailto:compliance@invisiblevision.com">compliance@invisiblevision.com</a>
Telephone:	+44 (0) 1603 631155
Registered Address:	3 Judges Drive, Norwich, Norfolk, NR4 7QQ, UK
Trading Address:	17 Princes Street, Norwich, Norfolk, NR3 1AF, UK

**1.7.** By using this website, you confirm that you agree to comply with our privacy policy.

## **2. HOW INVISIBLE VISION LTD. COLLECTS & USES INFORMATION**

### **2.1 What data do we collect?**

IVV may collect personal information in the legitimate course of our core business. Personal information is any information that tells us something about you. This could include information such as your name and contact details typically on a sales enquiry.

### **2.2. How do we collect your data?**

#### **2.2.1 Direct Communication**

For customers of and suppliers to IVV, we collect personal information directly from you, primarily when you engage in Core Business Activities with us e.g. purchasing our products, supplying us with goods/services, requesting that marketing be sent to you.

### 2.2.2 Information held in the Public Domain

Third party publicly held information such as Companies Houses, ICO register, Electoral Register and similar.

### 2.2.3 Third Parties

Third parties if we check references. We will only obtain personal data from such activities after obtaining written consent from you to do so.

### 2.2.4 Cookies & Automated Technologies

IVV does not use automated technologies or interactions as a matter of principal. We do not employ cookies or track or compile such technical data about browsing patterns or equipment. We regard such information as irrelevant to our business and customer base and best avoided to aid privacy.

As a customer of, or supplier to IVV, we would typically collect the following categories of information about you:

- Identity data: Includes first name, last name, title
- Contact data: Includes contact address, email address and telephone numbers
- Marketing and Communications Data: Includes your preferences in receiving marketing from us and our third parties and your communication preferences
- Marketing Permissions: We may in future include information submitted on our website, which will be used to communicate updates and marketing.

Individuals will be able to change their mind at any time by contacting us at:

[compliance@invisiblevision.com](mailto:compliance@invisiblevision.com)

## 2.3. How do we use your data and what is the legal basis that permits us to do this?

Under data protection legislation we are only permitted to use your personal information if we have a legal basis for doing so. We will therefore only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Responding to enquires and other communications.
- Responding and fulfilling recruitment enquiries.
- Where we need information to enter into a contract with you e.g. as a customer or supplier.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

In more limited circumstances we may also rely on the following legal bases.

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest or for official purposes.

Generally, we do not rely on consent as a legal basis for processing your personal data, but on occasions may seek consent as an additional control.

The table in the appendix at the end of this notice provides more detail about the information that we use, the legal basis that we rely on in each case and your rights.

## **2.4 What happens if you do not provide information that we request?**

**2.4.1.** We need some of your personal information in order to perform our contract with you. For example, if you are a customer and we do not have your contact details, we might not be able to satisfy your order request or for export license applications and compliance.

**2.4.2.** Where we need to collect personal data whether by law, under the terms of a contract we have with you or to consider your application for a role with us, if you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a service you have with us or we may not be able to progress your application for a role with us. We will notify you if this is the case at the time.

## **2.5. How do we share your information?**

**2.5.1** We share your personal information in the following ways:

- Within our company as part of our regular reporting activities.
- Where we share your personal information with third parties such as our global sales network, we ensure that we have appropriate measures in place to safeguard your personal information and to ensure that it is solely used for legitimate purposes in line with this Notice.

**2.5.2** In general, we do not share your personal data with third parties for marketing purposes.

## **2.6. How do we store your data and keep it secure?**

We use reasonable technical, administrative, and physical measures to protect personal information contained in our system against misuse, loss or alteration. Information will be treated as authorised by you. We are not responsible for the disclosure or interception of your personal information before we receive it.

Our site is maintained on servers located in the UK and personal information submitted through our site is stored on servers located in the UK. Personal information submitted through our site in connection with an enquiry is provided to the relevant person within Invisible Vision Ltd.

Personal data and emails are stored within our email system and Sage accounting software package as appropriate. Such systems are not remotely accessible, and password protected. Hard copy invoices and similar paperwork are filed securely at our offices as required.

Access to personal information is restricted to employees working within a group on a need-to-know basis e.g. access to our IT systems is granted only to teams/employees where it is relevant and appropriate to their roles within the business. Training will be provided to any employees working within the group who need access to your personal information to ensure it is secured at all times.

All computers/pcs/laptops issued to employees are fully secured, and password protected. System and software updates are automated to ensure computers/pcs/laptops are updated on a timely basis to keep them safe and secure.

## **2.7. When do we transfer your information overseas?**

We do not transfer your personal information to countries outside of the UK except with your permission where you have supplied contact details via a sales enquiry to IVV and where the enquiry would be better handled by a more local overseas sales channel to yourselves. The information transferred is limited to the name and contact details that you have supplied. Examples would be a German, US, Chinese or Japanese sales enquiry that we may forward to our local sales channels to follow up in such countries.

We recognise that countries outside the UK and the European Economic Area may not offer an equivalent level of protection for personal information as to the laws in the UK. We would therefore ensure that appropriate safeguards are put in place to protect your personal information & establish adequacy mechanisms to protect your information.

## **2.8. For how long do we keep your information?**

As a general rule we will only retain the minimum required personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

## **2.9. Marketing**

IVV may send you information about products and services of ours that we think you might like as well as those of any partner companies (brochures, press releases).

- If you have agreed to receive marketing, you may always opt out at a later date.
- You have the right at any time to stop IVV from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please email [info@invisiblevision.com](mailto:info@invisiblevision.com).
- We do not share your information with third parties for their use in direct marketing unless we have your permission.

## **2.10. Your Data Protection Rights**

You also have a number of rights in relation to your personal information. These include the right to:

### **2.10.1 Request access**

Obtain access to your personal information that we hold. You may request a copy of certain personal information that you have provided to us in a commonly used electronic format. This right relates to personal information that you have provided to us that we need in order to take steps to enter into a contract with you and personal information where we are relying on consent to process your personal information.

### **2.10.2 Request correction**

Request that your personal information is corrected if you believe it is incorrect, incomplete or inaccurate.

### **2.10.3 Request erasure**

Request that we erase your personal information in the following circumstances:

- If we are continuing to process personal data beyond the period when it is necessary to do so for the purpose for which it was originally collected.
- If we are relying on consent as the legal basis for processing and you withdraw consent.
- If we are relying on legitimate interest as the legal basis for processing and you object to this processing and there is no overriding compelling ground which enables us to continue with the processing.
- If the personal data has been processed unlawfully (i.e. in breach of the requirements of the data protection legislation).
- If it is necessary to delete the personal data to comply with a legal obligation.

If you wish to access or update your personal information or if you wish to delete your data entirely, please send a written request to us at [compliance@invisiblevision.com](mailto:compliance@invisiblevision.com)

We will not delete personal information that we are required to retain for our business operations or legal compliance.

### **2.10.4 Request restriction of processing**

Ask us to restrict our data processing activities where you consider that:

- Personal information is inaccurate.
- Our processing of your personal information is unlawful.
- Where we no longer need the personal information, but you require us to keep it to enable you to establish, exercise or defend a legal claim.

## **3. CHANGES TO THIS PRIVACY POLICY**

From time to time and without notice we may make changes to this Privacy Policy to reflect any changes to our privacy practices in accordance with changes to legislation, best practice or website enhancements. Use of our site after revision of the Privacy Policy signifies your consent to the revised Privacy Policy.

## **4. HOW TO CONTACT US**

If you have any questions, comments and requests regarding this Privacy Policy please contact us at

[compliance@invisiblevision.com](mailto:compliance@invisiblevision.com) or in writing to:

Invisible Vision Ltd., 17 Princes Street, Norwich, NR3 1AF, UK

## **5. COMPLAINTS**

Should you wish to report a complaint or if you feel that Invisible Vision has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office.

Information Commissioner's Office  
Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF  
Telephone: 0303 123 1113  
Fax: 01625 524510  
[www.ico.org.uk](http://www.ico.org.uk)

## **6. ICO REGISTRATION**

Invisible Vision Ltd. is registered with the UK Information Commissioner's Office.

Reference number: ZA699226

## **Appendix: HOW WE USE YOUR DATA**

We have set out below, in a table format, a description of the ways we may be required to use your personal data, and which of the legal basis we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

<b>PURPOSE / ACTIVITY</b>	<b>TYPE OF DATA</b>	<b>LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST</b>
To confirm or verify you as a new potential customer or supplier	a: Identity b: Contact c: Technical d: Marketing & Communications	Performance of a contract
To process and deliver our products services to you including managing payments, fees, charges and appropriate licenses.	a: Identity b: Contact c: Financial d: Transaction e: Marketing & Communications	Performance of a contract. Recover debts.
To manage ongoing relationship with you which will include: Servicing & Repairs Obsolescence issues Marketing Notifying you about changes to our terms or privacy policy	a: Identity b: Contact c: Marketing & communications	Performance of a contract Necessary to comply with a legal obligation. Necessary for our legitimate interests (to keep our records updated, new products)
To administer and protect our business and website (including troubleshooting, data analysis, testing, system maintenance).	a: Identity b: Contact c: Technical d: Usage	Necessary for our legitimate interests (for running our business, provision of administration and IT services and network security). Necessary to comply with a legal obligation.
Application for a role with us	a: Identity b: Contact c: Financial	Personal references & searches as required. Legal obligations