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Privacy Policy

Developed in accordance with
GDPR requirements.

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**INVESTORS
IN PEOPLE**

Gold

Fitzrovia IT Limited (“**Company**”, “**we**”, “**us**”, or “**our**”) is committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this privacy notice, or our practices with regards to your personal information, please contact us at complaints@fitzroviait.com.

When you visit our website <http://www.fitzroviait.com> (the “**Website**”), and more generally, use or enquire about any of our services (the “**Services**”, which include the Website), we appreciate that you are trusting us with your personal information. We take privacy very seriously and in this privacy notice, seek to explain to you in the clearest way possible; what information we collect, how we use it and what rights you have in relation to it.

This privacy notice applies to all information collected through our Services (which, as described above, includes our Website), as well as any related services, sales, marketing or events.

Please read this privacy notice carefully as it will help you understand what we do with the information that we collect.

Important Information:

- We collect data through (i) information which you provide to us, (ii) information automatically collected through cookies and (iii) information available from public sources. [Read more here.](#)
- We process your information for purposes based on legitimate business interests, the fulfilment of our contract with you, compliance with our legal obligations, and/or your consent. [Read more here.](#)
- We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfil business obligations. [Read more here.](#)
- We use cookies and other tracking technologies to collect and store your information with your consent. [Read more here.](#)
- We keep your information for as long as necessary up to a maximum of two years, to fulfil the purposes outlined in this privacy notice unless otherwise required by law. [Read more here.](#)
- We aim to protect your personal information through a system of organizational and technical security measures. [Read more here.](#)
- As a user within the European Union, and under the General Data Protection Regulation you a number of rights that relate to how we use your data. These rights are; the right to access, rectify, erase, restrict or object to use of your personal data. For more information on these rights, [read more here.](#)
- If you wish to make changes or contact our Data Protection Officer (DPO) you can do so with the contact details located [here.](#)
- If you wish to lodge a complaint with a regulatory body in the UK, you can do so by getting in contact with the ICO.

1. INFORMATION WE COLLECT

(i) Personal information you disclose to us

We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and Services, when you participate in activities on the Website or otherwise when you contact us.

The personal information that we collect depends on the context of your interactions with us and the Website, the choices you make and the products and features you use. The personal information we collect may include; names phone numbers, email addresses, professional titles, contact preferences; and other similar information.

It is up to you, the user, to ensure that all personal information which you provide to us is true, complete and accurate. Should you wish to change or adjust your data, you can notify us of any changes to such personal information.

(ii) Information automatically collected

Upon accepting our cookie policy, we collect certain information when you visit, use or navigate the Website. This information does not reveal your specific identity (like your name or contact information) but may include device, usage and technical information. This information is primarily needed to maintain the security and operation of our Website, and for our internal analytical and reporting purposes.

The information we collect includes:

- **Log and Usage Data:** Service-related, diagnostic usage and performance information which our servers automatically collect when you access or use our Website and which we record in log files. This data may include your IP address, device information, browser type and settings and information about your activity in the Website (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 hardware settings).
- **Device Data:** We collect device data such as information about your computer, phone, tablet or other device you use to access the Website. Depending on the device used, this device data may include information such as your IP address (or proxy server), device application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system configuration information.
- **Location Data:** We collect information data such as information about your device's location, for example, we may collect geolocation data that tells us your 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 Locations settings on your device. Note however, if you choose to opt out, you may not be able to use certain aspects of the Services.

(iii) Information collected from other sources

In order to fulfil our internal reporting requirements and enhance our ability to provide relevant marketing, offers and services to you or to update our records, we may obtain information about you from other public databases, such as those available on social media. This information does not reveal your specific identity (like your name or contact information) but may include demographic, usage and device data.

2. USE OF PERSONAL INFORMATION

We use personal information collected via our Website for a variety of business purposes described below. We process your personal information for these purposes in reliance on our



legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- **To send administrative information to you.** We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies.
- **To protect our Services.** We may use your information as part of our efforts to keep our Website safe and secure (for example, for fraud monitoring and prevention).
- **To enforce our terms, conditions and policies for business purposes, to comply with legal and regulatory requirements or in connection with our contract.**
- **To respond to legal requests and prevent harm.** If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- **To respond to user inquiries/offer support to users.** We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Services.
- **To send you marketing and promotional communications.** We may use the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. For example, when expressing an interest in obtaining information about us or our Website, subscribing to marketing or otherwise contacting us, we will collect personal information from you. You can opt-out of our marketing emails at any time.
- **Deliver targeted advertising to you.** We may use your information to develop and display personalized content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness.
- **For other business purposes.** We may use your information for other business purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Website, products, marketing and your experience. We may use and store this information in aggregated and anonymized form so that it is not associated with individual end users and does not include personal information. We will not use identifiable personal information without your consent.

3. SHARING INFORMATION

We may process or share your data that we hold based on the following legal basis:

- **Consent:** We may process your data if you have given us specific consent to use your personal information in a specific purpose.
- **Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- **Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfil the terms of our contract.
- **Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information 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.
- **Vendors, Consultants and Other Third-Party Service Providers.** We may share your data with third-party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. We may allow selected third parties to use tracking technology on the Website, which will enable them to collect data on our behalf about how you interact with our Website over time. This information may be used to, among other things, analyse and track data, determine the popularity of certain content, pages or features, and better understand online activity. Unless described in this notice, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.
- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honour this privacy notice.
- **Business Partners.** We may share your information with our business partners to offer you certain products, services or promotions.

For the purpose of marketing, we only share and disclose your information with the following third parties. We have categorized each party so that you may easily understand the purpose of our data collection and processing practices. If we have processed your data based on your consent and you wish to revoke your consent, please contact complaints@fitzroviait.com.

- Mass Communication platforms
 - Mailchimp
- Digital Advertising Platforms
 - Google Ads Remarketing
 - Google Analytics
 - Facebook and Instagram advertising platforms
 - LinkedIn advertising
 - Twitter advertising
- Web and Mobile Analytics
 - Google Ads
 - Google Analytics
 - Google Tag Manager
- Website Hosting
 - WordPress.com

4. USE OF COOKIES

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information.

There are a number of different types of cookies, however, our website predominantly uses:

- **Functionality based cookies** – Our Company uses these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.
- **Advertising cookies** – Our Company uses these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device, and your IP address. Our Company sometimes shares some limited aspects of this data with third parties for advertising purposes. We may

also share online data collected through cookies with our advertising partners. This means that when you visit another website, you may be shown advertising based on your browsing patterns on our website.

Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Website.

5. DATA RETENTION PERIODS

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than 2 years.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

6. SECURITY OF YOUR DATA

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information 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 cannot promise or guarantee that hackers, cybercriminals, or other unauthorized 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 information, transmission of personal information to and from our Website is at your own risk. You should only access the Website within a secure environment.

7. WHAT ARE YOUR PRIVACY RIGHTS?

You have rights that allow you greater access to and control over your personal information. You may review, change, or delete your details at any time. To make sure you are fully aware of all of your data protection rights we have detailed below the rights that every user is entitled to:

- **The right to access** – You have the right to request copies of your personal data.
- **The right to rectification** – You have the right to request that Our Company correct any information you believe is inaccurate. You also have the right to request Our Company to complete the information you believe is incomplete.
- **The right to erasure** – You have the right to request that Our Company erase your personal data, under certain conditions.
- **The right to restrict processing** – You have the right to request that Our Company restrict the processing of your personal data, under certain conditions.
- **The right to object to processing** – You have the right to object to Our Company's processing of your personal data, under certain conditions.
- **The right to data portability** – You have the right to request that Our Company transfer the data that we have collected to another organization, or directly to you, under certain conditions.

8. UPDATES TO THIS NOTICE

We may update this privacy notice 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 material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

9. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may contact our Data Protection Officer (DPO), Caroline Rhodes, by email at complaints@fitzroviait.com, or by phone at 020 3727 6020, or by post to:

Fitzrovia IT Limited
Attn: Caroline Rhodes
66-67 Newman Street
Fitzrovia, London W1T 3EQ
United Kingdom

10. ACCESSING DATA & LODGING COMPLAINTS

To request to review, update, or delete your personal information, please email complaints@fitzroviait.com We will respond to your request within 30 days.

If you believe we are unlawfully processing your personal information, you also have the right to lodge a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.