

## Data Protection Policy

Innovation Cashflow Services Ltd (iCS) respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

### 1. IMPORTANT INFORMATION AND WHO WE ARE

iCS is the controller and responsible for your personal data.

We have appointed a data protection officer (DPO). If you have any questions about this privacy notice or our data protection practices, please contact the DPO using the details set out below.

#### CONTACT DETAILS

Full name of legal entity: Innovation Cashflow Services Ltd (Company Number: 12900618)

Name or title of DPO: Kevin Johnson

Email address: [kev@i-cs.co.uk](mailto:kev@i-cs.co.uk)

Postal address: 59-61 Charlotte Street, St Pauls Square, Birmingham, B3 1PX

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

We keep our privacy policy under regular review. This version was last updated in October 2021.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### 2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you as follows:

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- Technical Data includes internet protocol (IP) address.
- Profile Data.
- Usage Data includes information about how you use our products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and 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 (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

### **3. HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data for the purpose for which we collected it which include the following:

- To register you as a new customer.
- To process and deliver your order.
- To manage your relationship with us.
- To enable you to participate in a prize draw, competition or complete a survey.
- To improve our website, products/services, marketing or customer relationships.
- To recommend products or services which may be of interest to you.

### **4. HOW WE SHARE YOUR PERSONAL DATA**

We may share your personal data within iCS and with our consultants and with external third parties.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **5. INTERNATIONAL TRANSFERS**

We do not transfer your personal data outside the UK.

### **6. DATA SECURITY AND RETENTION**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

### **7. YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data including the right to receive a copy of the personal data we hold about you. If you wish to exercise any of your rights relating to your personal data, please contact us.

You also have the right to make a complaint at any time to the Information Commissioner's Office, the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)).