



General Data Protection Regulation (GDPR)

1. Privacy and Your Personal Data

1.1 ImpulseLogic is committed to protecting the privacy of our users and customers. This privacy policy ("Privacy Policy") is intended to inform you on how we gather, define, and utilise your Information (as defined below).

1.2 It applies to Information collected by us, or provided by you, whether in one of our premises, over our Website (including the mobile optimised version of the website accessible from your portable hand-held device), or in any other way (such as over the telephone). It is also intended to assist you in making informed decisions when using our Website and our products and services. Please take a minute to read and understand the policy.

1.3 All your personal Information shall be held and used in accordance with the EU General Data Protection Regulation 2016/679 ("GDPR") and national laws implementing GDPR and any legislation that replaces it in whole or in part and any other legislation relating to the protection of personal data. If you want to know what information we collect and hold about you, or to exercise any of your rights as set out in section 9 below, please write to us at the below address or via email at: info@impulselogic.com

FAO: ImpulseLogic, 2410 Camino Ramon, Suite 295, San Ramon, CA 94573

1.4 ImpulseLogic is the controller of your Information.

2. What Information Do We Collect on our Website?

2.1 When you visit our Website (including the mobile optimised version of the website accessible from your portable hand-held device) you may provide us with personal information such as name, postcode, email address, phone number and areas of interest ("Information"). You may provide us with Information in a number of ways:

a) by supplying us with the Information as listed above, on an individual basis by sending us an enquiry or asking to receive updates from us. To send an enquiry from the website the user must provide us with your name, postcode, telephone number and email address, but you may also provide us with additional information if you choose to do so.

- b) by corresponding with us by email, in which case we may retain the content of your email messages together with your email address and our responses;
- c) other Information that may be provided by you when adding content to our social network pages such as LinkedIn.

3. What Information do we collect in our premises or elsewhere?

3.1 You may provide us with personal information such as name, address, telephone numbers, email address, how you heard about ImpulseLogic and your areas of interest ("Information"). You may provide us with Information by completing a New Enquiry form either in isolation or with a member of our team.

4. How we use your Information

4.1 We will hold, use and disclose your Information for our legitimate business purposes including:

- a) to answer your queries and requests
- b) to keep you up to date about important changes to our business;
- c) to direct-market our products and services and on occasion to advise you of news, events and promotions. Before we do so, you will be given an option to opt-out of such communications and an option to unsubscribe will also be provided with each communication.
- d) to provide further services to you by sharing your Information with trusted third parties. Further details about this are set out in the section 6 below on Sharing your Personal Information;
- e) to release Information to regulatory or law enforcement agencies, if we are required or permitted to do so.

5. The legal basis for processing your Information

5.1 Under GDPR, the main grounds that we rely upon in order to process your Information are the following:

- a) Necessary for compliance with a legal obligation – we are subject to certain legal requirements which may require us to process your Information. We may also be obliged by law to disclose your Information to a regulatory body or law enforcement agency;
- b) Necessary for the purposes of legitimate interests - either we, or a third party, will need to process your Information for the purposes of our (or a third party's) legitimate interests, provided we have established that those interests are not overridden by your rights and freedoms, including your right to have your Information protected. Our legitimate interests include responding to requests and enquiries from you or a third party, informing you about our products and services and ensuring that our operations are conducted in an appropriate and efficient manner;
- c) Consent – in some circumstances, we may ask for your consent to process your Information in a particular way.

6. How we share your Information

6.1 In certain circumstances we will share your Information with other parties. Details of those parties are set out below along with the reasons for sharing it.

a) Trusted third parties, for example other agencies: In order to provide certain services, we will share your information with third party service providers to fulfil your queries and requests with Impulselogic. We will not share your data with any third party where it is not necessary to do so to provide a service to you.

b) Regulatory and law enforcement agencies. As noted above, if we receive a request from a regulatory body or law enforcement agency, and if permitted under GDPR and other laws, we may disclose certain personal information to such bodies or agencies.

7. How long we hold your Information

We will only retain your Information for as long as is necessary for the purpose or purposes for which we have collected it. The criteria that we use to determine retention periods will be determined by the nature of the data and the purposes for which it is kept. In certain circumstances, once we have deleted or anonymised your data, we may need to retain parts of it (for example, your email address), in order to comply with our obligations under GDPR or other legislation, or for fraud detection purposes.

8. Your rights relating to your Information

8.1 You have certain rights in relation to personal information we hold about you. Details of these rights and how to exercise them are set out below. We will require evidence of your identity before we are able to act on your request.

a) Right of Access. You have the right at any time to ask us for a copy of the Information about you that we hold, and to confirm the nature of the Information and how it is used. Where we have good reason, and if the GDPR permits, we can refuse your request for a copy of your Information, or certain elements of the request. If we refuse your request or any element of it, we will provide you with our reasons for doing so.

b) Right of Correction or Completion. If Information we hold about you is not accurate, or is out of date or incomplete, and requires amendment or correction you have a right to have the data rectified, updated or completed. You can let us know by contacting us at the address or email address set out above.

c) Right of Erasure. In certain circumstances, you have the right to request that Information we hold about you is erased e.g. if the Information is no longer necessary for the purposes for which it was collected or processed or our processing of the Information is based on your consent and there are no other legal grounds on which we may process the Information.

d) Right to Object to or Restrict Processing. In certain circumstances, you have the right to object to our processing of your Information by contacting us at the address or email address set out above. For example, if we are processing your Information on the basis of our legitimate interests and there are no compelling legitimate

grounds for our processing which override your rights and interests. You also have the right to object to use of your Information for direct marketing purposes.

You may also have the right to restrict our use of your Information, such as in circumstances where you have challenged the accuracy of the Information and during the period where we are verifying its accuracy.

e) Right of Data Portability. In certain instances, you have a right to receive any Information that we hold about you in a structured, commonly used and machine-readable format. You can ask us to transmit that Information to you or directly to a third party organisation.

This right exists in respect of Information that:

- you have provided to us previously; and
- is processed by us using automated means.

While we are happy for such requests to be made, we are not able to guarantee technical compatibility with a third party organisation's systems. We are also unable to comply with requests that relate to Information of others without their consent.

8.2 You can exercise any of the above rights by contacting us at the address or email address set out above. You can exercise your rights free of charge.

8.3 Most of the above rights are subject to limitations and exceptions. We will provide reasons if we are unable to comply with any request for the exercise of your rights.

9. Consent

To the extent that we are processing your Information based on your consent, you have the right to withdraw your consent at any time. You can do this by unsubscribing via the link provided in any direct marketing communication or contacting us at the address or email address set out above.

10. Cookies

10.1 We use various technologies on our site to collect information that helps us improve your online experience. We refer to these technologies which include cookies, collectively as “**cookies**”. This Cookie Policy explains the different types of cookies used on our site and how you can control them.

10.2 What is a cookie? A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your device. Cookies are widely used throughout the Internet in order to make sites or other online services work or to be better or more efficient. They can do this because sites and other online services can read and write to the cookies stored on your device, enabling them to recognise you and remember important information that will make your use of them more convenience, for example, by remembering your preferences, username, or showing you pages that you seemed to have a particular interest in.

If you consent to us storing cookies on your computer or other electronic device then you agree that we can store and access cookies as described in this policy.

10.3 What do you use cookies for? Our site uses cookies to distinguish you from other users of our site and to save and retain certain parameters about you and your usage of our site. This helps us to provide you with a good experience when you browse our site and also allows us to improve our site.

If you would like more information about cookies and how you can manage the settings on your computer, you can visit <http://www.allaboutcookies.org/manage-cookies/>

10.4 Cookies we use:

Purpose and Content

Type Analytics/performance cookie

Purpose Used to distinguish users and sessions when they connect to the website

Content Randomly generated number

Provider

Google Analytics

Expiry

2 Years

Type Tracking

Purpose Used to distinguish users and sessions when they connect to the website

Content Randomly generated number **Provider** ColdFusion **Expiry** 2 Weeks