

# Privacy Policy

## How We Use and Manage Your Data

### Introduction

Interr respects your right to privacy. We put in place security measures for your personal data and manage your personal data in accordance with applicable data privacy regulations.

Please note that Interr is the Data Controller of your personal data. The principles set out in this Privacy Policy apply to all instances in which Interr receives your personal data as a Data Controller for the purposes described in this notice. Those purposes are processing of data in order to participate in the various activities available on this website or as mentioned below.

If you have any requests concerning your personal data or any queries with regard to these practices, please contact Interr using the contact details given in section 'Your Rights'.

We designed this Privacy Policy so that you don't have to read all of it to find an answer to a specific question. If you want to read all of it – please feel free to do so. It's set out in full below.

### Personal data Interr collects through our website and how Interr collects it?

You can provide your personal data if you wish. We only collect personal data that YOU want to provide to us or that is needed to provide (and improve) our service to you. We collect personal data directly such as name, age, gender, address and e-mail address as well as connection and system information. The legal basis for the processing of your personal data is your consent and/or any other applicable legal basis, such as our legitimate interest in engaging in commerce and offering products and services of value to you. Any consent you provide may be withdrawn at any time by following the contact methods listed in Paragraph 5.

You may want to give us your e-mail address, name, telephone number etc. so that we can provide you with information on our products/Services; respond to your questions or comments. Some website functionality may be unavailable to users who do not provide their data, or who do not consent to the use of Cookies and similar technologies on this site. Additionally, if you choose not to provide your personal data, we will not be able to provide you with our products or services or with other support or responses.

### Interr Security Measures

Interr takes security measures in line with data protection regulations. Interr has security measures in place designed to prevent data loss, to preserve data integrity, and to regulate access to the data. Only authorized Interr employees, and authorised employees of our Third-Party service providers' processing data on our behalf, have access to your personal data. All Interr employees who have access to your personal data are required to adhere to the Interr Privacy Notice and all third-party service providers are requested by Interr to ensure that any of their employees who have access to your personal data have signed non-disclosure agreements. In addition, contracts are in place with such third-party service providers acting as data processors for Interr that have access to your personal data, to ensure that the level of security required in your jurisdiction is in place, and that your personal data is processed only as instructed by Interr.

## How Interr uses your personal data

Your personal data will only be used for the purposes for which you provided it to Interr, as indicated to you at the time you provided your personal data. It will also be used to administer, support and obtain feedback on the level of our services, to help prevent breaches of security, the law or our contract terms. It may also be disclosed, including a disclosure to entities based outside the European Economic Area (“EEA”), to third parties (as part of the information generally contained in business) in the event of a sale of the business, or a reorganisation of the business, or as otherwise required or permitted by law or applicable regulator.

## Who Interr discloses your personal data to and why

Interr will never share your personal data with any Third-Party (i.e., a party other than an entity within the Interr Group) business organisation that intends to use it for their own purposes, other than as required by law. Interr, may transfer or disclose your personal data to another data controller in the Interr Group to be used for similar purposes, at its discretion, and you hereby consent to such transfer or disclosure. If your personal data is transferred or disclosed to another data controller within the Interr Group, that other data controller shall have the same rights and obligations with regard to your personal data as Interr.

With your consent, Interr may share your personal data with Third-Parties (i.e. parties other than entities within the Interr Group) such as those who assist us in providing the products and services and who perform technical operations, but only in the strictly limited circumstances set out below:

- Our “Third-Party Data Processors” (service providers such as our fulfillment and activation partners, and digital agencies, hosting providers, data storage providers and other technical partners) who help us administer this website, or process the data submitted to it, may have access to your data. Some of these business partners may be located outside the country where you accessed this website.

## Your rights

You have the right to ask Interr to provide you with all the information it stores on you. If you wish to access your personal data you can contact the data controller. You have the right to ask Interr to rectify, block, complete and delete your personal data, to restrict its use, and to port your data to another organisation. You have the right to request additional information about the handling of your personal data. You also have the right to object to the processing of your data by Interr in some circumstances and, where we have asked for consent to process your data, to withdraw this consent. Additionally, you may contact our Data Protection Officer:

hr@interr.com, 0207 837 2012 or Interr, The Loom, 14 Gower’s Walk, E1 1LU, London.

There are exceptions to these rights, however. For example, access to personal data may be denied in some circumstances if making the information available would reveal personal information about another person or if Interr is legally prevented from disclosing such information. In addition, Interr may be able to retain data even if you withdraw your consent, where Interr can demonstrate that it has a legal requirement to process your data.

## Countries your personal data will be sent to and why

Your personal data may be transferred across international borders. It may be transferred to countries that have different levels of data protection laws to the country from where you submitted your personal data. Interr (as Data Controller and Data Exporter) has, where local data protection regulations so require, put in place security measures for the export of personal data from its jurisdiction. Where local data protection regulations so require, Interr has made arrangements with entities receiving your personal data, that they shall ensure that security measures are in place, and that your personal data is processed only in accordance with EU Data Protection laws.

If data is transferred from within the EEA to a jurisdiction outside the EEA, it is done so under a Data Transfer Agreement, which contains standard data protection contract clauses. The European Commission has adopted standard data protection contract clauses (known as the Model Clauses), which provide safeguards for personal information that is transferred outside of Europe. We use Model Clauses when transferring personal data outside of Europe. If you wish to know more about international transfers of your personal data, you may contact our Data Protection Officer at Interr.

The server that makes our website available may be located outside the country from which you have accessed this website. The provider of this website is bound by a contract that ensures your data is managed in accordance with EU Data Protection laws and that it acts only on Interr instructions and implements all technical measures necessary on an ongoing basis to keep your personal data secure.

## **How and why Interr uses 'Cookies' and other similar technologies**

Interr does make use of Cookies, which are small text files that are placed on your computer by websites that you visit, or certain emails you open and other similar technologies such as Flash Cookies and web beacons. Such technologies are widely used in order to make websites work, or work more efficiently, as well as to provide business and marketing information to the owners of the site, to gather such personal data as browser type and operating system, referring page, path through site, domain of ISP etc. for the purpose of understanding how visitors use our website. Cookie and similar technologies help us tailor this website to your personal needs.

This type of information obtained through cookies will not be disclosed outside Interr or our authorized Third-Party Data Processors. It will not be used for unsolicited communications.

Cookies located on your computer do not contain your name but an IP address. In many case, after the user's session is cancelled the information contained in the cookies is no longer available to Interr.

Please ensure that your computer setting reflects whether you are happy to accept cookies or not. You can set your browser to warn you before accepting cookies, or you can simply set it to refuse them, although you may not have access to all the features of the website if you do so. See your browser "Help" button for how you can do this. Some Flash Cookies may not be affected by such settings. You do not need to have cookies on to use or navigate through many parts of this and other Interr websites. Remember that if you use different computers in different locations you will need to ensure that each browser is adjusted to suit your cookie preferences.

## **Interr's policy on collecting data from children**

We do not collect personal data from children under the age of 16.

## **Changes to the terms of this Privacy Policy**

Interr will occasionally make changes and corrections to this Privacy Policy. If we believe that the changes are material, we'll let you know by doing one (or more) of the following: (1) posting the changes on our website, or (2) sending you an email or message about the changes. We will also give you the opportunity to consent to these material changes. Changes will be effective upon the posting of the changes and your acceptance of the changes, which may be through your continued use of the site after the changes take effect.

## **Retention of your personal data**

Interr will retain your information only for as long as is necessary for the purposes set out in this policy. Interr will retain and use your information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your information to comply with applicable tax/revenue laws), resolve disputes, and enforce our agreements. We also retain

log files for internal analysis purposes. These log files are generally retained for a short period of time, except where they are used for website security, to improve website functionality, or we are legally obligated to retain them for longer time periods.

## How to contact Interr

The data controller responsible for your personal information for the purposes of the applicable European Union data protection law is Head of Human Resources.

If you have any questions about this Privacy Notice or our data collection practices, please contact us at the address, telephone number or email listed above and specify your country of residence and the nature of your question. You may also contact us by the following method: [hr@interr.com](mailto:hr@interr.com), 0207 837 2012 or Interr, The Loom, 14 Gower's Walk, E1 1LU, London.

## Policy Review

This policy was last reviewed and agreed by the board and seeks to be reviewed and updated as and when required. Any queries arising regarding this policy should be addressed to Mick Tabori.



Mick Tabori – CEO  
May 2018