

## Privacy Policy

### How We Use and Manage Your Data

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.

This policy should be read in conjunction with the Data Protection Policy.

As part of this, we recognise that we have a responsibility to protect all of the data we hold or process, whether it belongs to Interr Ltd, our employees, partners, customers, members of the public or suppliers. By protecting this data we can ensure that we maintain our reputation as a trusted employer and partner, enabling us to grow as a business and deliver exceptional service to our customers.

It is the responsibility of all our staff, regardless of grade, to become familiar with our security management processes and to comply with all information security and privacy policies and the procedures that underpin them.

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. This policy also includes information on how Interr collects data from our Interr.com website (or other linked Interr websites) during your visit to our site.

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.

For further information, refer to our Data Protection Policy.

### 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.

As part of our commitment to information security, Interr will implement industry best practice security controls and assure the effectiveness of our controls measures. Interr will ensure that any actual or suspected or potential breaches of information security are reported and investigated and accessing the maturity of our information security are audited and controlled regularly. The Executive Board fully support the information security management system and require all our staff, whether permanent or temporary, partner organisations, suppliers and contractors to do the same.

### **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. Full details stated on the Data Protection Policy.

### **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 fulfilment 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.

### **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**

The UK GDPR does not dictate how long the Company should hold personal data and therefore, 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.

### **Interr Website**

Interr Ltd may use cookies, web beacons, tracking pixels, and other tracking technologies when you visit our website [www.interr.com](http://www.interr.com) including any other media form, media channel, mobile website, or mobile application related or connected thereto (collectively, the "Site") to help customize the Site and improve your experience.

We reserve the right to make changes to this Cookie Policy at any time and for any reason. We will alert you about any changes by updating the "Last Updated" date of this Cookie Policy. Any changes or modifications will be effective immediately upon posting the updated Cookie Policy on the Site, and you waive the right to receive specific notice of each such change or modification.

You are encouraged to periodically review this Cookie Policy to stay informed of updates. You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted the changes in any revised Cookie Policy by your continued use of the Site after the date such revised Cookie Policy is posted.

## Use of Cookies

A “cookie” is a string of information which assigns you a unique identifier that we store on your computer. Your browser then provides that unique identifier to use each time you submit a query to the Site. We use cookies on the Site to, among other things, keep track of services you have used, record registration information, record your user preferences, keep you logged into the Site, facilitate purchase procedures, and track the pages you visit. Cookies help us understand how the Site is being used and improve your user experience.

## Types of Cookies

The following types of cookies may be used when you visit the Site:

### **Analytics Cookies**

Analytics cookies monitor how users reached the Site, and how they interact with and move around once on the Site. These cookies let us know what features on the Site are working the best and what features on the Site can be improved.

### **Personalization Cookies**

Personalization cookies are used to recognize repeat visitors to the Site. We use these cookies to record your browsing history, the pages you have visited, and your settings and preferences each time you visit the Site.

### **Security Cookies**

Security cookies help identify and prevent security risks. We use these cookies to authenticate users and protect user data from unauthorized parties.

### **Our Cookies**

Our cookies are “first-party cookies”, and can be either permanent or temporary. These are necessary cookies, without which the Site won't work properly or be able to provide certain features and functionalities. Some of these may be manually disabled in your browser, but may affect the functionality of the Site.

### **Site Management Cookies**

Site management cookies are used to maintain your identity or session on the Site so that you are not logged off unexpectedly, and any information you enter is retained from page to page. These cookies cannot be turned off individually, but you can disable all cookies in your browser.

Our Site Management cookies:

- A cookie indicating that a user has clicked accept on the cookie banner, so it won't be shown again.
- A cookie indicating the users country. Once the users IP address is identified, it won't have to be repeated.
- A cookie stored indicating that the user is redirected to the correct language for their country during their visit, so that if the user chooses to switch languages to one that doesn't match their country, the site doesn't switch back to the original language

## Control of Cookies

Most browsers are set to accept cookies by default. However, you can remove or reject cookies in your browser's settings. Please be aware that such action could affect the availability and functionality of the Site.

For more information on how to control cookies, check your browser or device's settings for how you can control or reject cookies, or visit the following links:

Apple Safari <https://support.apple.com/en-gb/guide/safari/sfri11471/mac>

Google Chrome <https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=en>

Microsoft Edge <https://support.microsoft.com/en-us/windows/microsoft-edge-browsing-data-and-privacy-bb8174ba-9d73-dcf2-9b4a-c582b4e640dd>

Microsoft Internet Explorer <https://support.microsoft.com/en-us/topic/delete-and-manage-cookies-168dab11-0753-043d-7c16-ed5947fc64d>

Mozilla Firefox <https://support.mozilla.org/en-US/kb/enhanced-tracking-protection-firefox-desktop?redirectslug=enable-and-disable-cookies-website-preferences&redirectlocale=en-US>

Opera <https://help.opera.com/en/latest/web-preferences/>

Android (Chrome) <https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DAndroid&hl=en&oco=1>

Blackberry <https://docs.blackberry.com/content/dam/docs-blackberry-com/release-pdfs/en/device-user-guides/BlackBerry-Classic-Smartphone-10.3.3-User-Guide-en.pdf>

Iphone or Ipad (Chrome) <https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DiOS&hl=en&oco=1>

Iphone or Ipad (Safari) <https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DAndroid&hl=en&oco=1>

In addition, you may opt-out of some third-party cookies through the Network Advertising Initiative's Opt-Out Tool.

## Other tracking technologies

In addition to cookies, we may use web beacons, pixel tags, and other tracking technologies on the Site to help customize the Site and improve your experience. A "web beacon" or "pixel tag" is tiny object or image embedded in a web page or email. They are used to track the number of users who have visited particular pages and viewed emails, and acquire other statistical data. They collect only a limited set of data, such as a cookie number, time and date of page or email view, and a description of the page or email on which they reside. Web beacons and pixel tags cannot be declined. However, you can limit their use by controlling the cookies that interact with them.

## 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  
July 2022