



## Privacy notice UK

Welcome to IRESS's privacy notice.

We respect your privacy and we are committed to protecting your personal data.

This privacy notice will inform you as to how we collect, use and protect your personal data. It will also tell you about your privacy rights and how the law protects you.

Please also use the [Glossary](#) to understand the meaning of some of the terms used in this privacy notice.

### [1. IMPORTANT INFORMATION AND WHO WE ARE](#)

### [2. THE DATA WE COLLECT ABOUT YOU](#)

### [3. HOW YOUR PERSONAL DATA IS COLLECTED](#)

### [4. HOW WE USE YOUR PERSONAL DATA](#)

### [5. THIRD PARTIES TO WHOM WE MAY PROVIDE YOUR PERSONAL DATA](#)

### [6. INTERNATIONAL TRANSFERS OF YOUR PERSONAL DATA](#)

### [7. DATA SECURITY](#)

### [8. DATA RETENTION](#)

### [9. YOUR LEGAL RIGHTS](#)

### [10. GLOSSARY](#)

## 1. IMPORTANT INFORMATION AND WHO WE ARE

### PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how we collect and process your personal data.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### CONTROLLER

IRESS is made up of different legal entities, details of which can be found here: [IRESS Legal Entities](#). This privacy notice is issued on behalf of the IRESS Group so when we mention "IRESS", "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the IRESS Group responsible for processing your data.

## CONTACT DETAILS

If you have any questions about this privacy notice or any questions or concerns regarding the manner in which your personal data is being processed please send your query to:

Compliance Officer  
IRESS FS Limited  
Jessop House  
Jessop Avenue  
Cheltenham  
GL50 3SH

Email: [compliance@iress.co.uk](mailto:compliance@iress.co.uk)

## CHANGES TO THE PRIVACY NOTICE

This version has been published on 25<sup>th</sup> July 2018. Historical versions of our privacy notice can be obtained by [contacting us](#).

## YOUR DUTY TO INFORM US OF CHANGES

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes by [contacting us](#).

## THIRD-PARTY LINKS AND EMBEDDED CONTENT

This website may include links to third-party websites and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements or the manner in which they process your personal data. When you leave our website, we encourage you to read the privacy notice of every website you visit.

This website may also include embedded third-party content. Any embedded content that references a third party's name or trade mark may be embedded third-party content. Interacting with that third-party content may allow third parties to collect or share data about you. We are not responsible for the manner in which third parties may process your personal data following your access of such content (including their delivery of cookies); nor are we responsible for third-party privacy statements. When you access embedded third-party content, we encourage you to read any associated privacy notice provided by a third party related to the embedded content (which may require you to follow links to the third party's privacy notice or website).

## 2. THE DATA WE COLLECT ABOUT YOU

Personal data means any information about an individual from which that person can be identified. It does not include anonymized or aggregated data, where it is not possible to identify an individual from that data.

We may collect, use, store and transfer different kinds of personal data about you, and we have grouped this together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender. If you attend our offices, we may collect details of your car registration.
- **Contact Data** includes billing address, postal 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, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website, products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs).
- **Profile Data** includes your username and password, purchases or orders made by you and any requests for support, your interests, preferences, feedback, survey responses, entries to competitions or promotions, and where you have registered for training or an event.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties.

We also collect, use and share **Aggregated Data** such as statistical or demographic data. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

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.

## IF YOU DO NOT PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you do not provide that data when requested, we may not be able to perform the contract we have in place with you, 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 YOUR PERSONAL DATA IS COLLECTED

We use different methods to collect data from and about you including:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our products or services;
  - subscribe to our service or publications;
  - request marketing communications to be sent to you or update your marketing preferences;
  - enter a competition, promotion or survey;
  - attend seminars, training or other events;
  - give us some feedback;
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [cookies policy](#) for further details.

- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - Third parties to whom you have provided your personal data where you have expressly consented to them sharing your contact details with IRESS or to a category in which IRESS' business activities would fall (including where you have attended an event which has been sponsored by IRESS and you have agreed to the event organiser sharing your contact details with event sponsors);
  - Publicly available sources, for example Companies House, The Financial Conduct Authority, directories, search engines and social media.

#### 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data:

- Where we need to perform the contract we are about to enter into or have entered into with you; or
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; or
- Where we need to comply with a legal or regulatory obligation; or
- Where you have agreed to us processing your personal data.

The lawful basis on which we will rely in processing your personal data will depend on the purpose for which we are using it – further details are set out in the following paragraph.

#### PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data on more than one lawful basis depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific lawful basis we are relying on to process your personal data where more than one lawful basis has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy notice (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to understand

		how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to understand how customers use our products/services, to understand how potential customers may wish to use our products/ services, to develop our products and services and grow our business)
To administer and protect our business and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to understand how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)  Where we are required to obtain your consent under the Privacy and Electronic Communications Regulations then we will rely on consent in order to market to you.
To send you relevant marketing communications via email, post or telephone, for example to promote IRESS news, products and services, industry insight, whitepapers, research, events, competitions, training and surveys	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)  Where we are required to obtain your consent under the Privacy and Electronic Communications Regulations then we will rely on consent in order to market to you.

## MARKETING

We have established a [marketing communications preference centre](#) where you can view and make certain decisions about how your personal data is used.

Unless you have previously unsubscribed, you may receive our marketing communications (including by post, email and telephone) if you, or the business you work for:

- currently receive an IRESS product or service;
- have received an IRESS product or service in the past;
- have expressly consented to a third party sharing your contact details with IRESS (or to a category in which IRESS' business activities would fall) so that we may send you marketing communications, including where you have attended an event which has been sponsored by IRESS and you have agreed to the event organiser sharing your contact details with event sponsors;
- have expressed an interest in IRESS, our products or services by providing us with your contact details for example:
  - by email, post or during a conversation with us
  - by submitting your contact details via our website or a social media site
  - by providing us with your business card or entering into an IRESS prize draw or competition
  - via a marketing campaign / survey

If you would prefer not to receive any communications or would like to tailor the way we contact you, please visit our [preference centre](#).

## OPTING OUT

You can ask us to stop sending you marketing messages at any time by visiting our [preference centre](#) and checking or unchecking relevant boxes to adjust your marketing preferences.

Where you opt out of receiving these marketing messages, we will stop sending you marketing messages but if you are an IRESS customer then we will still need to process your personal data for the purpose of supplying you with our products or services.

## COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

For detailed information on the cookies we use and the purposes for which we use them, please see our [cookies policy](#).

## CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5. THIRD PARTIES TO WHOM WE MAY PROVIDE YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below, or use certain third parties in the course of collecting your personal data, for the purposes set out in the table in paragraph 4 above.

### THIRD PARTIES

#### Internal Third Parties

Other companies in the IRESS Group and who are based in Australia, South Africa, Canada, Singapore and New Zealand and provide IT and system administration services, service delivery and payment administration, provision of support services and reporting.

This includes staff engaged in the fulfilment of any contracts we have with you, the processing of your payment details and the provision of support services.

#### External Third Parties

- Service providers: Google LLC, SurveyMonkey Inc., dotmailer Limited and Umbraco A/S.
- If you are client, or a user of our products in an organisation with whom we have a contract - third party processors who we are authorised to use pursuant to our contract with you.
- Professional advisers: including lawyers, bankers, auditors and insurers who provide consultancy and accounting services.
- HM Revenue & Customs, Companies House, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

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.

## 6. INTERNATIONAL TRANSFERS

We may share your personal data within the IRESS Group. This may involve transferring your data outside the European Economic Area (**EEA**).

In addition, some of our external third parties are based outside the European Economic Area (**EEA**) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we will always ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We may transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission (they are subject to a “finding of adequacy”). For further details of countries which are subject to a finding of adequacy, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).
- Where the country to which we are transferring your data is not subject to a finding of adequacy, we will use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please [contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## 7. DATA SECURITY

We ensure that there are 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.

Following an audit by the British Standards Institution (BSI) we have achieved ISO/IEC 27001 accreditation. This is an internationally recognised certificate for best practice framework for managing information security.

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.

## 8. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider any applicable legal requirements, together with the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means.

If you require further information regarding the period for which we will retain your personal data please [contact us](#).

In some circumstances you can ask us to delete your data: see [Request erasure](#) below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case this data will cease to be your personal data and we may use this information indefinitely without further notice to you.

## 9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

[Request access to your personal data.](#)

[Request correction of your personal data.](#)

[Request erasure of your personal data.](#)

[Object to processing of your personal data.](#)

[Request restriction of processing your personal data.](#)

[Request transfer of your personal data.](#)

[Right to withdraw consent.](#)

If you wish to find out more about any of the rights set out above, or wish to exercise any of them, please [contact us](#).

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

## NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

## WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 10.GLOSSARY

### LAWFUL BASIS

**Legitimate interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).

**Performance of contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### YOUR LEGAL RIGHTS

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In

some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.