

IMS Cloud Ltd Privacy Statement

Updated: 9th March 2022

Protecting your privacy is important to IMS Cloud Ltd. This Privacy Statement explains how IMS Cloud Ltd processes personal data collected through websites, products, services and through in-person and digital events, webinars, surveys, and marketing activities. References to “IMS Cloud Ltd,” “we,” or “our” means IMS Cloud Ltd, and IMSCAD Global Ltd.

This Privacy Statement describes how we process personal data for our own purposes. We do not control the data processing or protection practices of our customers, which may differ from those set out in this Privacy Statement.

“Personal data” is information that identifies, or can reasonably be linked directly or indirectly to, an identifiable person. Personal data does not include information that is anonymous, de-identified, or aggregated, as those terms may be defined under applicable law. For purposes of this Privacy Statement, “personal data” and “personal information” have the same meaning and are used interchangeably.

What information does IMS Cloud Ltd collect about you?

We obtain personal data in different ways. Some personal data is collected directly from you. Other data is automatically collected or generated about how, when, and why you interact with us through our offerings, including data obtained using cookies and other tracking technologies.

Information you provide us:

We collect information directly from you, such as when you sign up for an account or use our offerings, register a product or service, of our events, interact with one of our events, surveys, activities or with social media, The types of information we may collect from you include:

- **Identification**, such as your name, telephone number, physical and/or email addresses, IP address, account username, and account password.
- **Professional information**, such as your occupation, industry, professional licenses, work experience and employment history, and other qualifications.
- **Commercial information**, such as details about your subscription plans, the offerings that you have purchased, used and/or expressed interest in, and events you have attended.
- **Financial account information**, such as payment information you provide when making a purchase of or through an offering (a third-party processes these transfers on our behalf as described below).
- **Education information**, such as your educational background and training records.
- **Protected characteristics**, such as your date of birth (where applicable).
- **Visual, audio, and electronic information**, such as your picture or signature; records of our interactions, such as correspondence, details of complaints and their resolutions, service records; your preferences, including your preferred tools, experience, language, and the frequency at which you wish to receive marketing communications.

When you make purchases through our websites, we use payment processors (**PayPal, Worldpay**) and do not store credit card or other financial information (other than confirmation that payment in a certain amount has been made). We collect contact and account information from you that we pass through to the payment processor to facilitate the transaction. For more information you can contact our providers as set forth in their privacy notices.

Information we obtain or generate:

We automatically collect or generate certain personal information about you based on your interactions with us, such as when you use our offerings, and we may associate that information with your account. The information we collect includes:

- **Identification**, IP addresses, cookies (small text files stored by your web browser when you use our websites) cookie Identification and usernames.
- **Internet or other electronic network activity information**, such as the website domain visited which activities and offerings are used, how, and for how long.
- **Electronic information**, such as information about operating systems, device types, information about browsers, information relating to automatic updates and technical errors, information about your use of our offerings, including your preferred tools and experiences, and your engagement with our activities.

Except as described in our Privacy Statement, whether we collect data using Cookies is up to you. You can change your mind at any time by going into your application settings for privacy settings.

In addition, we gather certain information automatically as part of your use of our products and services via IMS Cloud Ltd analytics programs and tools, including third-party analytics tools, such as **Google Analytics**.

Information we collect from other parties:

We receive and process information from our affiliates and from third-party sources, such as employers, business partners, business contact databases, enrichment services, channel partners (e.g., resellers), marketing service providers, third-party data aggregators, and social networking services and platforms (e.g., LinkedIn and Facebook). We also receive information from publicly available sources and licensors. The categories of personal information we collect from these sources include:

- **Identification**, such as names, phone numbers, and email addresses.
- **Professional information**, such as occupations, industries, professional licenses, work experience and employment histories, and other qualifications.
- **Education information**, such as your educational background.
- **Commercial information**, such as events you have attended or activities you have participated in.

In accordance with applicable law, we may combine your personal data with information we collect from other parties to help keep our databases current and accurate, and to provide you with more relevant content, experiences, applications, and other offerings.

How does IMS Cloud Ltd use the information it collects about you?

We use your personal data mindfully, and in useful ways, including:

- To validate your identity as necessary to perform our contract with you.
- To deliver services, products, and other offerings, including information and recommendations, as necessary to perform our contract with you.
- To send you important information, such as about your account or purchases, within the scope of our contract with you.

- To send you information you requested to the extent necessary to perform our contract with you or, when not necessary to perform a contract, in furtherance of our legitimate interest, for example in responding to customer inquiries.
- To maintain and improve the security of, and to troubleshoot any issues relating to, our offerings as necessary to perform our contract with you or, when not necessary to perform a contract, in furtherance of our legitimate interest in protecting our business.
- To send you promotional offers, advertising, or other marketing content in furtherance of our legitimate interest to engage in direct marketing or, where needed, with consent.
- To detect, prevent, or otherwise address non-valid use such as through fraud and software piracy (e.g., to confirm that software is genuine and properly licensed) and to protect you, IMS Cloud Ltd, and/or third parties in furtherance of our legitimate interests. For example, learn more about how IMS Cloud Ltd detects and combats non-valid software here.
- To comply with our legal obligations under applicable laws.
- To protect the rights, safety, and property of IMS Cloud Ltd, you, or any third party in furtherance of our legitimate interest in protecting us, our users, and third parties.
- For other purposes for which we obtain your consent.

Where we rely on your consent to process personal data, you may withdraw your consent at any time by contacting us at the contact details below or as otherwise indicated to you in writing. Please note that your withdrawal of consent will not affect our processing activities based on your consent that occurred before your withdrawal.

When we process personal data about you to comply with legal requirements or to perform our obligations under a contract with you or with our customer through whom you use our offerings, failure to provide such data may prevent or delay our completion of these obligations.

How does IMS Cloud Ltd disclose your personal data?

We disclose the categories of information described above to the following categories of persons:

- **Our service providers**, including vendors, consultants, and other service providers who perform services or functions on our behalf, for business purposes. For example, our service providers include companies who support us with marketing, sales, consulting, communications, software maintenance and support, analytics, social media, market research, auditing for valid use, license compliance, security, user verification, localization, and payment processing. Our service providers process your information subject to contractual terms that restrict their ability to use your information.
- **Our business partners**, such as integration partners, channel partners (e.g., resellers), event sponsors, partners, and attendees.
- **Social networking services and platforms** to connect with or share information publicly, with service providers, or with your contacts on such services or platforms.
- **Persons to whom we are required by law to provide information**, such as pursuant to a court order.
- **Law enforcement, legal counsel, or other reasonably necessary parties** when we have a good faith belief that the disclosure is necessary to prevent or respond to fraud or software piracy, defend ourselves against attacks, or protect the rights, property, and safety of IMS Cloud Ltd, our customers, and the public.

- **Persons involved in the consideration, negotiation, completion of a business transaction,** including the sale, merger, consolidation, acquisition, change in control, transfer of substantial assets, bankruptcy, or reorganization, and any subsequent integration.

We may also disclose your personal information to other parties when we have your consent to do so or when you direct us to, for any purposes requested or permitted by you.

We may share aggregate, anonymous, statistical, and other information regarding use of our offerings with third parties for marketing, analytics, planning, and other purposes. Such information will not specifically identify any user.

How does IMS Cloud Ltd protect your data?

We maintain a combination of reasonable and appropriate physical, administrative, and technological controls to protect your data from unauthorized access or malicious actions. For more information about our security practices, please visit privacy.statement.info@imscadglobal.com

We take reasonable steps to limit the access employees, contractors, and agents of IMS Cloud Ltd have to your personal data to those who need to know this data to perform their assigned functions.

What rights and choices do you have?

You have the right to access, update, delete, receive a copy of, or restrict our use of your personal data. Please contact us privacy@imscadglobal.com you have the right to withdraw consent any time.

To request a copy of the personal data in your account, please contact us privacy@imscadglobal.com. Consistent with applicable law, we may ask for proof of your identity before fulfilling your request, and we may ask for additional forms of verification depending on the nature of the personal information requested.

Where we process personal data on behalf of our customers, we may refer the request to the relevant customer and cooperate with their handling of the request, subject to any special contractual arrangement with that customer.

What are IMS Cloud Ltd storage and data retention practices?

We store your personal data and content on our servers and the servers of our service providers. Because we and our service providers maintain servers in global locations, your personal data may be transferred across national borders and stored on the servers outside of your country or region. We will retain your personal data for as long as necessary to provide you with the offerings that you are using or have requested, for the establishment, exercise, or defence of legal claims, and as needed to comply with our legal obligations. Data may persist in copies made for backup and business continuity purposes for additional time.

What is IMS Cloud Ltd marketing and advertising practices?

We use analytics tools and work with one or more advertising networks (our “Ad Partners”) that use Cookies or other technologies to collect information about application visitors, to serve ads, and to help us track results of advertising and marketing campaigns. We process your personal data for the above activities in furtherance of our legitimate interests or, where required, with your consent.

As described above, you can change your Cookie preferences. Cookie choices are generally application-, browser-, and device-specific, so you may need to refresh your choices if you visit a different application, use a new browser or device, or clear your browser’s cookies.

Will this Privacy Statement change?

We may change this Privacy Statement to reflect changes in the law, our data handling practices, or the features of our business. We will show the date the Privacy Statement was last updated to help you know when we change it. If we make material changes to our Privacy Statement, we will endeavor to provide you with notice before such changes take effect, such as through prominent notice on our website or services or by email.

How to contact us?

To contact us, please use the following contact information. When you do so, please tell us the name of the offering about which you are contacting us:

By email at: privacy.questions@imscadglobal.com

By post:

IMSCloud LTD
7 Thorndean Avenue
Warninglid
West Sussex
RH17 5SX

Who can I contact with questions or concerns?

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have a right to lodge a complaint with the;

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113