

Amtivo Website Privacy Policy

Welcome to Amtivo's privacy policy. Amtivo respects your privacy and is committed to protecting your personal data.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our website. By accessing or using this Website, you agree to this privacy policy. This policy may change from time to time. Your continued use of this website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

This is the standard privacy policy that applies to Amtivo companies. Please follow the link to see a full list of applicable [Amtivo companies](#).

When we use "Amtivo", "we", "us" or "our" in this privacy policy, we are referring to the relevant Amtivo company responsible for processing your data. When you purchase a product or service with us, or enter into a working relationship with us, we will tell you which Amtivo company you are dealing with.

What is the purpose of this document?

This privacy policy describes how we collect and process your personal data during and after your working relationship with us, in accordance with the relevant data protection legislation applicable in the territory in which you are accessing this website from. There are jurisdiction-specific provisions provided further down in this document.

It is important that you read this privacy policy together with any other privacy policy 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 policy supplements the other policies and notices and is not intended to override them.

Data protection principles

We will comply with data protection laws which apply in the jurisdiction in which Amtivo operate in. This generally means that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The data we collect about you

Personal data means any information relating to an identified or identifiable individual. It does not include data where the identity has been removed (anonymous data).

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

- **Identity Data** includes first name, last name.
- **Contact Data** includes business address, email address and telephone numbers.

- **Transaction Data** includes 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.
- **Profile Data** includes your username and password, purchases or orders made by you.
- **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 and your communication preferences.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. 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.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us, but we will notify you if this is the case at the time.

How is your personal data collected?

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

- **Direct interactions.** You may give us your personal data by filling in forms, corresponding with us by post, phone, email or otherwise, or using our products and services. This includes personal data you provide when you:
 - Enquire about products and services;
 - Sign-up to and use our products and services;
 - When we conduct assessment or inspection services;
 - Subscribe to our service or publications;
 - Request marketing to be sent to you;
 - Enter a competition, promotion or survey; or
 - Give us some feedback.
- **Third party interactions.** We may receive your information from a third party, for example where a referral is made from another Amtivo company. We will always ensure that the data has been collected and shared with us in accordance with our legal obligations.
- **Automated technologies or interactions.** As you use our website, products and services, we may automatically collect personal data by using cookies, server logs and other similar technologies. Please see our cookie policy for further details, including information about the cookies we use. 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.

How 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.

Purpose/Activity	Type of data
To register you as a new customer	(a) Identity (b) Contact
To process and deliver your order	(a) Identity (b) Contact (c) Marketing and Communications
To process and deliver a service on behalf of a third party (e.g. public body or regulatory body):	(a) Identity (b) Contact (c) Profile
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications
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 Communication
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data.)	(a) Identity (b) Contact (c) Technical
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
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage
To make suggestions and recommendations to you about goods or services that may be of interest to you (marketing)	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile

Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table above.

- Other members of the Amtivo group of companies.
- External Third Parties:

- Regulators, such as UKAS, ANAB, INAB, Accredia, IASME, IRCA, TrustMark, SSIP, NHSS and SIA, who regulate our products and services.
- Subcontractors, who we may wish to use to provide our services.
- Service providers, such as certification bodies and consultants, whose services we believe would be of benefit to you and you have agreed to allow us to pass on your details.
- Public authorities or regulatory bodies who have contracted us to provide a service.
- Hosting services, such as those providing the platform for our online products and services.
- Customer feedback providers for customer feedback and satisfaction surveys.
- Professional advisers including lawyers, bankers, auditors and insurers who provide banking, legal, insurance and accounting services.
- Tax authorities, regulators and other authorities 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 policy.
- Our website may include links to third-party websites, plug-ins 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. When you leave our website, we encourage you to read the privacy policy of every website you visit.

International transfers

We may transfer your personal data to other countries if we share it with other Amtivo companies.

We may also use service providers and organisations based outside the country of collection for the purpose of processing your personal data.

Where the paragraphs above apply, we will ensure that the transfer of your personal data is compliant with data protection law. You can obtain more details about the protection given to your personal data when it is transferred outside the country of collection by contacting us at dataprotection@amtivo.com.

Data security

We have put in place 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.

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.

Data retention

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

consider 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, and the applicable legal requirements.

United Kingdom and European Economic Area

This section of our privacy policy only applies where we collect personal information from individuals based in the United Kingdom or the European Economic Area.

Legal basis for processing your personal data

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

1. Where we need to perform the contract we are about to enter into with you, or have entered into with you.
2. Where we need to comply with a legal or regulatory obligation.
3. 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. Our legitimate interests include providing our business services, studying how customers use our products and services in order to develop them and grow our business, running our business, provision of administration and IT services, network security, preventing fraud, business reorganisations or group restructuring exercises, informing our marketing strategy, keeping our website updated and relevant.

Generally, we do not rely on consent as a legal basis for processing your personal data.

We collect and process the personal data in accordance with UK GDPR and/or EU GDPR as appropriate. We will also comply with other data protection laws which may be applicable in the country in which we collect your personal data.

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.

Your legal rights

Under certain circumstances, by law you have rights under data protection laws in relation to your personal data, as follows:

- **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 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. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Object to direct marketing.** You also have the right to object where we are processing your personal data for direct marketing purposes. You can ask us to stop sending you marketing messages at any time by following the opt out links on any marketing message sent to you or by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, service experience or other transactions.
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of 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 a third party. We will provide you, or a third party you have chosen, with 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 your consent** to the processing. In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact dataprotection@amtivo.com. Once we have received notification that you have withdrawn your consent, we will no longer process your personal data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.
- **Raise a complaint** at any time to your data protections authority. We would, however, appreciate the chance to deal with your concerns before you approach your data protection authority so please contact us in the first instance.

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact us by email dataprotection@amtivo.com or by post via Data Protection, Amtivo Group Limited, 30 Tower Views, Kings Hill, West Malling, Kent, ME19 4UY United Kingdom.

United States of America

This section of our privacy policy only applies where we collect personal information from individuals based in the United States of America.

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Children Under the Age of 16

Our website is not intended for children under 16 years of age. No one under age 16 may provide any personal information to or on the website. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on this website, register on the Website, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or username you may use.

Your State Privacy Rights

State consumer privacy laws may provide their residents with additional rights regarding our use of their personal information.

California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Montana, Oregon, Tennessee, Texas, Utah, and Virginia provide (now or in the future) their state residents with rights to:

- Confirm whether we process their personal information.
- Access and delete certain personal information.
- Correct inaccuracies in their personal information, taking into account the information's nature processing purpose (excluding Iowa and Utah).
- Data portability.
- Opt-out of personal data processing for:
 - targeted advertising (excluding Iowa);
 - sales; or
 - profiling in furtherance of decisions that produce legal or similarly significant effects (excluding Iowa and Utah).
- Either limit (opt-out of) or require consent to process sensitive personal data.

The exact scope of these rights may vary by state. To exercise any of these rights please contact dataprotection@amtivo.com.

Canada

This section of our privacy policy only applies where we collect personal information from individuals based in Canada.

You may have the right to access your personal information by making a written request to us. If the information requested is something we hold in our records, we will aim to provide the requested information within 30 days unless there is a legal reason not to.

If you would like more information about how we process your data or on how to raise a complaint regarding our usage of your personal data, please contact dataprotection@amtivo.com

Japan

This section of our privacy policy only applies where we collect personal information from individuals based in Japan.

To comply with our obligations under the Act on the Protection of Personal Information (APPI), we have created this privacy policy to show our commitment to data protection, the purposes for processing personal data, and how we comply with the APPI.

We operate on a global basis. Accordingly, your personal data may be transferred and stored in countries outside Japan that are subject to different standards of data protection. We will take appropriate steps to ensure that transfers of Personal Related Information are in accordance with applicable APPI.

You may submit a written request to access your data. You are not required to pay any charge for exercising your rights. If you make a request by email, we will respond to you within one month.

For any questions about this privacy policy, our data practices, or the way to exercise your rights, you can contact dataprotection@amtivo.com. You can also complain to the Personal Information Protection Commission:

Address: Kasumigaseki Common Gate West Tower 32nd Floor, 3-2-1, Kasumigaseki, Chiyoda-ku, Tokyo, 100-0013, Japan.

Contact number: +81-3-6457-9680

Website: www.ppc.go.jp