

Privacy and Cookie Policy

The VIM Group (as defined below) is committed to protecting and respecting your privacy.

This policy (together with our [Terms of Use](#), [Cookie Policy](#) and any other documents referred to on it) sets out the basis on which any personal data collected from you, or that you provide to the VIM Group will be processed by us.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting vim-group.com, you are accepting and consenting to the practices described in this policy.

Information About Us

This Privacy Policy covers any personal data collected by or provided to Indego B.V.; VIM Group Brand Implementation GmbH; VIM Group Brand Implementation Limited; and VIM Group Brand Implementation B.V. (the “VIM Group”). Any reference to ‘we’ ‘us’ ‘our’ covers any part of the VIM Group).

Our Data Protection Officer is Thijs Weggeman, who can be contacted by email at thijs.weggeman@vim-group.com.

What Does This Policy Cover?

This Privacy Policy applies to the use of vim-group.com (the ‘Site’) and any personal data that has been provided to us by you (please in document below) or third parties (please in document below) excluding data provided by our personnel (for the purpose of this Privacy Policy a ‘data subject’).

For the avoidance of doubt this policy does not cover any personal data provided to us by employees, contractors, suppliers or sub-contractors.

What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details,

but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

Your Rights

As a data subject, you have the following rights under the GDPR, which this Privacy Policy and our use of personal data has been designed to uphold:

- a. The right to be informed about our collection and use of personal data;
- b. The right of access to the personal data we hold about you (please see in document below)
- c. The right to rectification if any personal data we hold about you is inaccurate or incomplete (please contact us using the contact details at the foot of this document);
- d. The right to be forgotten – i.e. the right to ask us to delete any personal data we hold about you (we only hold your personal data for a limited time, as explained below in this document but if you would like us to delete it sooner, please contact us using the contact details at the foot of this document);
- e. The right to restrict (i.e. prevent) the processing of your personal data;
- f. The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
- g. The right to object to us using your personal data for particular purposes; and
- h. Rights with respect to automated decision making and profiling. We do not use your personal data in this way.

If a data subject has any cause for complaint about our use of your personal data, please contact our Data Protection Officer using the details provided above in this document and we will do our best to solve the problem for you. If we are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

Information we collect from you

We will collect and process the following data about you:

Information you give us.

This is information about you that you give us by filling in forms on our site vim-group.com (**our site**) or by corresponding with us by phone, email or otherwise including without limitation at any networking event.

It includes information you provide when you register to receive our newsletter, participate in discussion boards or other social media functions on our site, enquire about our services, ask us to communicate with you, you engage us in providing good and services, you ask us to provide you with information about our networking events, if we provide you with a quotation and when you report a problem with our site.

The information you give us may include your name, address, company name, email address and phone number and personal description.

Information we collect about you.

With regard to each of your visits to our site we will automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page;
- personal data such as your name, email address and other contact details;
- order placement information

We may collect the following other information:

- personal data such as your name, email address and other contact details when you engage us to provide services;
- personal data such as your name, email address and other contact details when you engage us to provide you with a quotation for our services;
- personal data such as your name, email address and other contact details when we are networking with you (e.g. if we are on a guest list);
- personal data such as your name, email address and other contact details when you subscribe for our mailing list;

How Do We Use Your Data?

All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the GDPR at all times. For more details on security please see below in this document.

Our use of your personal data will always have a lawful basis, either because it is necessary for our performance of a contract with you, because you have consented to our use of your

personal data (e.g. by subscribing to emails), or because it is in our legitimate interests. Specifically, we may use your data for the following purposes:

- a. Providing and managing your access to our site;
- b. Personalising and tailoring your experience on our site;
- c. Supplying our services to you;
- d. Replying to correspondence from you;
- e. Supplying you with emails that you have opted into (you may [unsubscribe or opt-out](#) at any time);
- f. Inviting you to specific events
- g. Notifying you of upcoming changes to services
- h. Notifying you of any industry updates
- i. Analysing your use of our site to enable us to continually improve our site and your user experience;

We use information held about you in the following ways:

Information you give to us.

We will use this information:

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information and services that you request from us;
- to provide you with information about other services we offer that are similar to those that you have already enquired about;
- to provide you with information about services we feel may interest you. If you are an existing customer, we will contact you with information about services similar to those which were the subject of a previous interest to you, invitations to our future events, and for general marketing purposes. If you do not want us to use your data in this way, please contact us on the details at the foot of this document;
- to ensure that content from our site is presented in the most effective manner for you and for your computer;
- to ensure we constantly improve our services and what we offer;
- for what we feel are any legitimate business purposes;
- to contact you about services or events which may be of interest to you.

Information we collect about you.

We will use this information:

- to administer our site and services and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- for publicity of our services;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;

- to improve our services;
- to allow you to participate in upcoming events and features of our service, when you choose to do so;
- to keep you informed of upcoming changes;
- for what we consider to be legitimate business purposes;
- as part of our efforts to keep our site safe and secure;
- to make suggestions and recommendations to you about goods or services that may interest you or them.

Information we receive from other sources.

We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

With your permission and/or where permitted by law, we may also use your data for marketing purposes which may include contacting you with information, news and offers on our services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

Third parties whose content appears on our site may use third party Cookies, as detailed below in this document. Please refer below in this document for more information on controlling Cookies. Please note that we do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.

You have the right to withdraw your consent to us using your personal data at any time, and to request that we delete it. We will delete such data unless we have an overriding interest to retain this.

How long will you keep my personal data?

We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):

- a. Information provided by corresponding with us: we shall review this every 2 years and delete at such time the data does not have any relevance to the legitimate interest to our business or where we have not heard from you in 12 months of our last correspondence.
- b. Information you provide when you register to receive our newsletter; we shall review this every 2 years and delete at such time the data does not have any relevance to the legitimate interest to our business or where we have not heard from you in 12 months of our last

correspondence or you have opted out.

c. Information you provide when you participate in discussion boards or other social media functions on our site we shall review this every 2 years and delete at such time the data does not have any relevance to the legitimate interest to our business or where we have not heard from you in 12 months of our last correspondence.

d. Information you provide when you report a problem with our site we shall review this every 2 years and delete at such time the data does not have any relevance to the legitimate interest to our business or six years from the reporting of any issue.

e. Internet protocol (IP) address browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; we shall review this every 2 years and delete at such time the data does not have any relevance to the legitimate interest to our business.

f. Full Uniform Resource Locators (URL), we shall review this every 2 years and delete at such time the data does not have any relevance to the legitimate interest to our business or where we have not heard from you in 12 months of our last correspondence.

g. Clickstream to, through and from our site (including date and time), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page; we shall review this every 2 years and delete at such time the data does not have any relevance to the legitimate interest to our business or where we have not heard from you in 12 months of our last correspondence.

How and Where Do We Store Your Data?

We only keep your personal data for as long as we need to in order to use it as described above, and/or for as long as we have your permission to keep it.

Your data will only be stored within the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein).

Data security is very important to us, and to protect your data we have taken suitable measures to safeguard and secure data collected through our site or from you.

Steps we take to secure and protect your data can be found here below.

Do We Share Your Data?

In certain circumstances, we may be legally required to share certain data held by us, which may include your personal data, for example, where we are involved in legal proceedings, where we are complying with legal obligations, a court order, or a governmental authority.

We may compile statistics about the use of our site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not

include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.

You agree that we have the right to share your personal information with:

Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

Selected third parties, including:

- business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- analytics and search engine providers that assist us in the improvement and optimisation of our site;

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If the Group Companies (or any one such company) or substantially all of their assets are acquired by a third party, in which case personal data held by them about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our [Terms of Use](#) and other agreements; or to protect the rights, property, or safety of the Group Companies, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

What Happens If Our Business Changes Hands?

We may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of our business. Any personal data that you have provided will, where it is relevant to any part of our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by us.

In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes.

How Can You Control Your Data?

When you submit personal data, you may be given options to restrict our use of your data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails and at the point of providing your details).

Where We Store Your Personal Data

All information you provide to us is stored on our secure servers.

Unfortunately, the transmission of information via the internet or otherwise is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

The Website

The Site is owned and operated by the VIM Group.

If you do not accept and agree with this Privacy Policy, you must stop using vim-group.com (**our site** immediately).

The Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

Cookies

In order to provide you with the best, tailored experience of vim-group.com, our site will need to place small text files, or 'cookies', on your computer.

By using our Site, you may receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than us.

All cookies used by and on Site are used in accordance with current Cookie Law. Details of the Cookies placed on your computer or device can be seen [here](#).

Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you.

These Cookies are not integral to the functioning of our Site and your use and experience of our Site will not be impaired by refusing consent to them.

You may, if you wish, deny consent to the placing of Cookies; however certain features of our Site may not function fully or as intended.

In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access our Site more quickly and efficiently.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

Third Parties

Our site may, from time to time, contain links to and from the websites of our partner networks. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Language

At all times the English language version of this Privacy Policy shall prevail.

Applicable Law

English law shall apply to this policy. Any question arising out of this policy as to the construction or effect of any clauses shall be decided in accordance with the laws of England and Wales.

Jurisdiction

You irrevocably agree that the courts of England and Wales shall have non-exclusive jurisdiction to settle any dispute or claim arising out of, or in connection with, this Privacy Policy, its subject matter or formation (including non-contractual disputes or claims).

Access to Information

You have the right to reasonably ask us for a copy of all your personal information that we hold free of charge. To make this 'subject access request', please write to the following address:

The Managing Director
VIM Group
Warnford Court
29 Throgmorton Street
London
EC2N 2AT
UK

To help us to serve you to our best ability and your greatest benefit, and if you are happy for us to hold the information that we have, please confirm with us that it is correct or tell us if it is not.

Changes to our Privacy Policy

Any changes we make to our Privacy Policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our Privacy Policy.

Contact

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to contact@vim-group.com.