



imagitech<sup>®</sup>

# Privacy Policy

September 2021



## **Privacy Policy Statement**

Imagitech Limited (“Imagitech”) is committed to safeguarding the privacy of all its customers; this policy sets out how we will treat your personal information and is to be read in conjunction with our Fair Processing and Data Protection statement (see above).

If you continue to use our products, services and websites (all Imagitech applications and apps, The Official Driving Theory Test, DTS Anytime, Complete Theory Test, Learn2® and Roadmarque®) we assume that you agree to this policy and consent to our use of personal data in accordance with the terms of this policy.

## Collecting personal information

We may collect, store and use the following kinds of personal information when you use Imagitech's products and services.

1. When visiting our websites or web-based products we may collect information about your computer and about your visits to and use of our websites including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths;
2. When using our apps or applications information about your device and usage of any of our apps or applications including the duration and number of sessions, app/application launches/opens/updates, in-app purchases, operating system, device model, geographical location, referral source and app/application navigation and general usage;
3. Information that you provide to us when using our products and services such as your name and email address;
4. Information that you provide to us for the purpose of email notifications, registering with us, newsletters and/or entering a competition;
5. Any other information that you choose to send to us including information contained in or relating to any communications that you send to us via email, through our products and websites including the communication content and meta data associated with the communication;
6. Within our learning products performance and progress data;
7. Only if you use Roadmarque® to participate in a risk management programme for your employer, we will also collect company name, address and mobile phone details, driver licence details, driving history, vehicles, results obtained when sitting any tests, training outcomes, signature on paper based mandates, e-signature when providing e-approval; information that we obtain directly from DVLA and third parties working with DVLA about your licence when you give your approval for driver licence inspections by your employer as part of the risk management programme as delivered via Roadmarque® including your endorsements, driving entitlements and other driver licence specific information – but no medical data;

**Note:** Before you disclose personal information relating to another person, you must obtain that person's consent to both the disclosure and the processing of that personal information, in accordance with the terms of this policy.

## Using your personal information

Personal information submitted to us or obtained by us through our products, services and websites will be used for the purposes specified in this policy, the Fair Processing and Data Protection Statement or on the relevant pages of the website or app stores.

We may use your personal information to:

1. Administer our website and conduct our business;
2. Personalise any service we provide to you;
3. Personalise learning content to improve learning outcomes and assess any claim under a Pass Guarantee scheme where appropriate;
4. Within our free to use products marketing and ad targeting when opted in;
5. Enable your use of the services available via our apps and applications or on our website in a secure environment;
6. Send you messages as necessary to the fulfilment of your tasks with our systems or in answer to enquiries submitted by you;
7. Send you email notifications that you have specifically requested;
8. Produce statistical information about our users and programmes provided that the information is provided in such a way that it will not be possible to identify any individual user from that information for the purposes of research to improve our services to you, of analysing the efficacy of our websites and/or systems and products, and/or improving user experience;
9. Deal with enquiries and complaints relating to our website, systems and products;
10. Keep our website secure and prevent fraud;
11. Keep your interaction with the website secure;
12. Ensure that as a user of our systems your interaction with our systems is as comfortable, straight forward and secure as possible;
13. Verify compliance with the terms and conditions governing the use of our website and systems (including monitoring any messages that are sent through our website);
14. Invite you to review our products and services either directly on the App Store or via a trusted third-party service, such as Trustpilot.

If you participate in a risk management programme with your employer via Roadmarque® these data uses may be as directed by your employer, or as determined within Roadmarque®; in this case we might also share this information with your employer and their appointed advisors and suppliers to manage risk related to driving, and to propose, organise and analyse interventions in line with the policies and practices of your employer. In this context we act as data processor to your employer.

If you submit or permit personal information for publication on our website or third-party websites, we will publish and use that information in accordance with the licence you grant to us.

## **Disclosing personal information**

We may disclose your personal information to our employees, officers, agents, suppliers, insurers, professional advisers, or subcontractors insofar as reasonably necessary for them to discharge their duties strictly in relation to the purposes as set out in this privacy policy.

In addition we may disclose your personal information:

1. To the extent that we are required to do so by law;
2. In connection with any ongoing or prospective legal proceedings;
3. In order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
4. To the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling; and
5. To any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

Except as provided in this policy, we will not provide your personal information to third parties.

## Data transfers

Information that we collect as outlined in this document may be stored and processed in and transferred between any of the countries in which we operate, to enable us to use the information in accordance with this policy.

Information that we collect as outlined in this document may be transferred to countries which do not have data protection laws equivalent to those in force in the UK and the European Economic Area with the exception of data collected by our online systems (DTS Anytime, The Official Driving Theory Test and Roadmarque®).

Personal information that you expressly agree to have published on any of our websites or submit for publication on any one of our websites may be available, via the internet, around the world. We cannot prevent the access to and use or misuse of such information by others.

You expressly agree to the transfers of personal information described in this Section.

## Retaining personal information

This Section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal information.

Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

Notwithstanding the other provisions of this Section, we will retain documents (including electronic documents) containing personal data:

1. to the extent that we are required to do so by law;
2. if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and
3. in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

## **Amendments**

We may update this policy from time to time by publishing a new version on our website. You should check this page occasionally to ensure you are happy with any changes to this policy.

## **Your rights**

You may instruct us to send you a copy of any personal information we hold about you, to correct any personal information we hold and you think is inaccurate, or to remove any personal information that we hold. You must supply us with appropriate evidence of your identity to support your instruction.

If we receive a valid request we will have one calendar month to respond to you.

If repeated requests are made then we may request the payment of a fee (currently fixed at GBP 10).

We may withhold personal information that you request to the extent permitted by law.

You may instruct us not to process your personal information for marketing purposes, by sending an email to us. In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt-out of the use of your personal information for marketing purposes.

Please contact us by writing to the business address given below if you wish to make a request.

## **Third party websites**

Our websites and products may include hyperlinks to, and details of, third party websites. We have no control over, and are not responsible for, the privacy policies and practices of third parties.

## **Updating information**

Please let us know if the personal information that we hold about you needs to be corrected or updated.

## Cookies

Most of the websites you visit use cookies to improve your experience; enabling a site to ‘remember’ you, either for the duration of your visit (using a ‘session cookie’) or for repeat visits (using a ‘persistent cookie’). Cookies can be used for lots of different jobs, like letting you navigate between pages efficiently, storing your preferences, and improving your experience of a website. Cookies make the interaction between you and the website faster and easier. If a website doesn’t use cookies at all, it thinks you are a new visitor every time you navigate from one page to the next. Without cookies, it would be impossible to recall your login details for example.

Some websites will also use cookies to enable them to target their advertising or marketing messages based for example, on your location and/or browsing habits. It is this kind of tracking that has resulted in the obligation for website owners to ask the users to agree to the use of cookies. Our websites do not use cookies for that purpose.

Cookies may be set by the website you are visiting (‘first party cookies’) or they may be set by other websites who run content on the page you are viewing (‘third party cookies’).

### What does a cookie contain?

A cookie is just a formatted text file that is stored on your computer by a website’s server. Only the server that stores it will be able to retrieve or read its contents. Each cookie is unique to your web browser. It contains some anonymous information such as a unique identifier and the site name along with some extra encoded data. By reading that previously stored information, the website can recall things like your preferences or what you placed into your shopping basket (for example).

### Cookies used on Imagitech sites

Our sites use cookies to maintain a session. We need to maintain a session when we use security (e.g. for DTS Anytime or Roadmarque®), which requires you to log in, in order to see information that is pertinent to you.

This is a very common use of cookies – virtually any site that requires a login, also requires this kind of cookie to differentiate between and identify the different people that are using the site at a given moment in time. These cookies are essential to the operation of a secure website and the data protection law does not require us to seek permission for these - however we do need to inform you.

Cookies are not used for any other purpose on Imagitech’s websites. By continuing to use Imagitech’s websites you give your consent for these cookies to be placed on your computer.



## Data protection registration

Imagitech are registered with the UK Information Commissioner's Office with the data protection registration number Z744679X.

## Our details

This policy applies to the products, websites and services provided by Imagitech Limited registered in England and Wales under registration number 03117065, with registered office at Ethos, King's Rd, Swansea, SA1 8AS UK.

You can contact us by writing to the business address given above or by using the details available on [imagitech.co.uk](http://imagitech.co.uk), [roadmarque.com](http://roadmarque.com) or [learn2app.co.uk](http://learn2app.co.uk).