

INNOVO- Privacy Policy

What is the purpose of this Privacy Notice?

INNOVO is committed to protecting the privacy and security of your personal information (also known as personal data).

This privacy notice describes how we collect and use personal information about you. In particular this notice applies if you:

- Work for an organisation which is a member of our INNOVO Network
- Engage with us or otherwise use our INNOVO Marketplace available at www.innovo-marketplace.com (**Marketplace**)
- Access and use our website www.innovo-network.com
- Work for an organisation with which we collaborate or are engaged in a joint venture.

Who we are

INNOVO is under common ownership with the following companies. When we refer to 'INNOVO', 'we' or 'us' in this Policy, we are referring to all the companies, unless specifically stated differently:

- INNOVO Net Zero Limited
- INNOVO Network Limited
- INNOVO Central Divisions Limited
- INNOVO JV Holdings Limited

INNOVO is a "data controller" and registered with the ICO under number ZA821878. This means that we are responsible for deciding how we hold and use personal information about you under data protection laws.

Please note: where we are providing the Marketplace to your organisation, as a Network Member, then your organisation will be the data controller and we will process your data according to your organisation's instructions, in order for you and your organisation to use the Marketplace. Therefore, initial data queries should be directed to your organisation; however, we will assist where possible.

We may update this notice from time to time and will make updated versions available on our website www.innovo-network.com and in the Marketplace.

It is important that you read this notice, so you are aware of how and why we are using such personal data.

Information we hold about you

We may collect, store, and use the following personal information about you for the purpose of operating the websites, Marketplace and operating our business:

- Contact details such as name, address, organisation/employer, job or work role, work telephone number, work e-mail address and mobile telephone number (which may also be a personal number).
- Information about the services that we provide to you/your organisation and related account information.
- Information that you provide to us when you contact us by phone, email, through Marketplace or our website, or when you communicate with us via social media.
- Financial, transaction data and credit checks.
- Profile information related to your log-in, access and use of Marketplace.
- When as a Network Member you communicate with other Network Members via our Marketplace.
- Information on websites through which you have contacted us, website usage and technical information.
- Profile or employment information if you wish to join INNOVO, as a Corporate Entrepreneur or in another capacity, or if you wish to attend our Centre of Excellence.

Under the UK GDPR, there are "special categories" of more sensitive personal data, which require a higher level of protection, including information about race, ethnicity, religious belief, sexual orientation, political opinions, health, genetic or biometric information and information about criminal offences or convictions.

We do NOT currently, usually, store or use any of the "special categories" of more sensitive personal information about you.

How is your personal information collected?

Direct Interactions: We collect personal information about you when you:

- request information on products and services from other Network Members, including via the Marketplace.
- purchase and receive our services and/or products, including becoming a Network Member or to purchase access to our catalogue of Network Member technologies and products.
- create an account on our website or Marketplace.
- engage with us as part of a joint venture.
- enquire about or discuss our services and/or products.
- subscribe to our newsletter or mailing list.
- request marketing to be sent to you.
- respond to a survey or provide feedback.
- communicate with us via social media.
- join or apply to join INNOVO, including our Centre of Excellence

Automated technologies or interactions. As you interact with our website and Marketplace, we will 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. Please see our [Cookies Policy](#) for further details.

Third Parties: We may also sometimes collect additional information from third parties including:

- From your organisation when it is registered as a Network Member;
- From banks, financial institutions and payment processing facilities;
- Credit Check providers, Companies House and any other agreed third-party references;
- From industry regulators and Government bodies;
- Contact, financial and transaction data from providers of technical, payment and delivery services.
- From your organisation if we are collaborating on a joint venture.

How we will use your personal information, and the lawful basis for this

We may use your personal information to pursue legitimate interests of our own or those of third parties, being primarily to operate our website and Marketplace, provided that your interests and fundamental rights do not override those interests. We may also rely on a contract with you to provide our services or Marketplace to you in order to process your information, or because we are required by legal obligations. These are known as the lawful bases for processing.

Some key situations in which we will process your personal information, and under which lawful basis, are listed below:

- for the purpose of entering and performing a contract with you, including opening an account for our Marketplace.
- to maintain our own administrative and accounting records and to fulfil related legal obligations to which we may be subject.
- for the purpose of marketing communications based on your consent (unless we are already providing services to you- known as the soft opt-in – or you work for an organisation which we reasonably believe would be interested in our services).
- to provide our Marketplace and services to your organisation as a Network Member, which may be needed to perform a contract or for our legitimate interests.
- To otherwise administer our business and perform our services, including communicating with clients, Network Members and partners and their employees, managing cloud and IT systems, operating websites, managing our supply chain, securely storing customer information, and to better understand and improve our services, all subject to our legitimate interests.
- To manage any application to join INNOVO and our recruitment purposes (for our legitimate interests and legal obligations).

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information. For more information, please contact our [Compliance Officer](#).

If you fail to provide personal information

If you fail to provide certain information when requested, we may be limited in our ability to provide our services to you, to allow you access to our Marketplace and products of Network Members, or to respond to your requests for information.

Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention.

At present we do NOT use automated decision-making to process personal data.

Profiling

Profiling consists of the use of personal information to evaluate characteristics relating to an individual, in particular, to analyse or predict aspects about them or their behaviour.

At present we do NOT conduct profiling.

Data sharing

We may need to share your personal information with third parties where required by law, where it is necessary as part of our working relationship with you or where we have another legitimate interest in doing so. In some circumstances we may also request your consent to do so.

Processors: In particular, we may share your data with third party processors whom we engage to:

- process your data on our behalf in support of our services to you, including Salesforce, Procmarket, Microsoft, and other CRM providers, (for the provision of CRM, cloud and hosting services).
- Communicate with you on our behalf, including via our e-newsletter.

Network Members and clients: We may disclose your personal information to a Network Member, if you work for or otherwise are engaged by them, so you may use Marketplace to engage with other Network Members as a supplier or customer (you may object to this processing by us, but please note that it may affect the ability to perform contracts with your organisation).

Other Data Controllers: we also work with third party partners who collect and process your data themselves as data controllers. In particular, this includes credit check organisations and third-party payment processors who will collect and process your payment details (e.g., Stripe). Please refer to their privacy notices and terms of use for details on how they process your personal information.

What about other third parties?

We may share your personal information with other INNOVO companies and third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

Transferring information outside the UK/EEA

We are a global organisation and as such we do transfer personal data outside of the UK and the European Economic Area (EEA) in some circumstances. To do this we will first determine whether there is an adequacy decision (permission) by the UK Government (or European Commission if you are based in the EEA) in respect of those countries. Otherwise, we will ensure we use contracts approved by the European Commission and/or the UK Government (as applicable), which give personal data the same protection it has in Europe and the UK, as well as undertaking an appropriate due diligence and risk assessment of that service provider and local laws.

Data security & Retention

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties that need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, 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. For Network Members and clients, we may retain personal data for up to 7 years in order to manage contracts, queries and legal proceedings.

Anonymised Data

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. For example, we may aggregate or anonymise data on how you use our website or Marketplace, to calculate the percentage of users accessing a specific website feature, or to better understand how our products function and services operate more widely.

Your Rights

Please keep us informed

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it.
- object to processing of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- request the transfer of your personal information to another party.

If you want to exercise any right, please contact our [Compliance Officer](#).

No fee usually required

You will not usually have to pay a fee to access your personal information (or to exercise any of the other rights).

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 the information (or to exercise any of your other rights).

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing or transfer of your personal information, you have the right to withdraw your consent for that related processing at any time. To withdraw your consent, please contact our [Compliance Officer](#).

Compliance Officer- Contact Us

We have appointed a compliance officer to oversee compliance with this privacy notice or to answer any questions about how we process your personal information. To contact them please use the below email.

Email: compliance@innovo-network.com

Complaints

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. Details can be found here:

<https://ico.org.uk/global/contact-us/>
compliance@innovo-network.com