

IMA Group Privacy Policy

I. Definitions

- I.1 Data Controller means the responsible party who processes data within IMA Group.
- I.2 Fee Scopes means the associated professional fees associated with the relevant service provided under the IMA Group.
- I.3 ICO means UK Information Commissioner's Office which is set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.
- I.4 IMA means IMA Group, and vice versa.
- I.5 IMA Group means IMA Holdings (Company Registration Number 10272133) and all subsidiary companies.
- I.6 Law means the governing Courts of England and Wales.
- I.7 Policy refers to this Group Privacy Policy document.
- I.8 Terms of Business means the Terms of Business for a relevant service provided under the IMA Group.
- I.9 UK Protection Law means the laws under the UK Data Protection Act.
- I.10 We means IMA Group, and vice-versa.

2. Scope

- 2.1 This Policy encapsulates:
- 2.1.1 How, when and why we collect and use your personal data;
- 2.1.2 How any personal data we collect from you is kept secure;
- And
- 2.1.3 Your rights over the personal data we collect, and how to exercise your rights.

2.2 This Policy covers any and all persons who consent to collection and use of their personal data, including, but not limited to: clients; tenants; contractors; associates; marketing recipients; website visitors; whether prospective, active or historic.

2.3 We review this Policy regularly, and may change this Policy from time to time as we may deem necessary or required by Law.

2.4 We will notify you of any material changes to the Policy as soon as practically possible, using the contact details we hold for you.

2.5 This Policy was last updated in, and in effect from, May 2018.

2.6 The latest version of the Policy will be publically available on the imaindustries.com website.

3. Data Collection

3.1 We may collect and store the following data: your name; your telephone number; your email address; your correspondence address; your residential address history; your date of birth; your financial information such as your bank account details (when bank statements may be provided); your employer details; any references provided by your employer, sponsor, solicitor, social acquaintance (for character references); activity on our website.

3.2 We may collect and store your personal data from the following sources: forms completed by you (including, but not limited to, Terms of Business, Fee Scopes, enquiry forms, application forms, offer forms, valuations and appraisals); enquiries made by you (including, but not limited to, enquiries via our website, telephone enquiries, email enquiries, any other written enquiries, direct communication in-branch or on-site); third parties who have your consent or legal obligation to share information with us.

4. Data Processing

4.1 We may process your personal data to properly and adequately respond to your enquiry; carry out any relevant activity or service; fulfil any relevant contract; monitor, analyse and improve our website, products and services; maintain insurance coverage; manage risk; obtain professional advice; manage legal disputes; or comply with legal obligations.

4.2 We may also use your personal data for marketing and advertising purposes, although only if you have specifically consented to receiving marketing communication from us (see 8.1).

4.3 We document all personal data that we collect, including the source of the data, how and when it was collected, and who, if any other organisations, it has been shared with.

4.4 We maintain these records and correct any inaccuracies as soon as practically possible, and inform any other organisations, that we are obliged to do so, of these corrections as soon as practically possible.

5. Data Sharing

5.1 We will not share your personal data with any third party unless required for us to properly and adequately fulfil the reasons outlined in 4.1.

5.2 Any personal data shared with us by a third party will only be used properly and adequately to fulfil the reasons outlined in 4.1.

6. Data Protection

6.1 We hold all personal data that we collect as securely as possible on our systems, including using encrypted devices with password protection enabled, and review and update our protection regularly.

6.2 However, we cannot absolutely guarantee the security of any information when transmitted that you provide via telephone, internet (including email) or postal communication.

7. Data Retention

7.1 We will hold your personal data on our systems indefinitely, and at least as long as is necessary for us to carry out the relevant activity, including fulfilling any relevant contract, until and unless you inform us that you wish us to erase the data we hold for you.

8. Consent

8.1 For marketing and advertising purposes or new enquiries made via our website, your personal data will only be collected and processed if and once you have consented for IMA to do so, having had prior opportunity to review this Policy.

8.2 We will collect and process your personal data without explicitly requesting your consent if we are required by Law to do so, or under the legal basis to adequately fulfil the reasons outlined in 4.1, except for new enquiries made via our website.

8.3 For the avoidance of doubt, we will provide you prior opportunity to review this Policy before engaging in any new activity or contract with you, the latest available version will be publically available on the imaindustries.com website.

8.4 If we plan to use your personal data for any new purpose other than those you have already consented to, we will communicate this to you before starting any new processing.

8.5 You reserve the right to contact us to access, correct, amend or erase your personal data at any time, where relevant, except where we are required by Law, or to adequately fulfil the reasons in 4.1, to not comply with your request.

8.6 You reserve the right to contact us to limit or object to processing of your personal data at any time, where relevant, except where we are required by Law, or to adequately fulfil the reasons outlined in 4.1, to not comply with your request.

9. Regulation

9.1 IMA is registered, and has been since 2010, with the UK Information Commissioner's Office (ICO), the UK's supervisory authority for personal data, under the registration number: **ZA042872**.

9.2 In the event that IMA fail to comply with UK Protection Law, you may lodge a complaint with the ICO using the above registration number as reference.

10. Contact

10.1 Any questions regarding this Policy, our privacy practices, or the data we hold for you, should be directed in the first instance to info@imaindustries.com with the reference "Privacy Policy".

10.2 We will endeavour to respond to all such queries within 72 hours.