

# PRIVACY & COOKIE POLICY

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Registered Address: The Oakley, Kidderminster Road, Droitwich, England, WR9 9AY  
Company Numbers: 11433890 | 10177944 | 11433537

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## 1 BACKGROUND:

IMGeospatial (AI Holdings Ltd, IMG AI Ltd, Clever Clogs IP Ltd, IMG IP Ltd, IMG AI Operations Ltd)) understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all our employees, clients and suppliers and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

## 2 DEFINITIONS AND INTERPRETATION

In this Policy the following terms shall have the following meanings:

“Account”	means an account required to access and/or use certain areas and features of Our Site;
“Cookie”	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in Part ?? below.

## 3 INFORMATION ABOUT US

IMG AI Ltd registered in England under company number 11433890. Registered address: The Oakley, Kidderminster Road, Droitwich, England, WR9 9AY.

VAT number: 299869991

Acting Data Protection Officer: Michele Slade, Email address: mslade@IMGeospatial.com.

AI Holdings Company No. 11433537 and Clever Clogs IP Ltd 10177944, IMG IP Ltd 12067764 and IMG AI Operations Ltd 12067724 all of which’s registered address in England is: The Oakley, Kidderminster Road, Droitwich, Worcestershire WR9 9AY.

AI Holdings Ltd VAT number 300480945

Clever Clogs IP Ltd Vat number 328488956

Acting Data Protection Officer: Michele Slade, Email address: mslade@IMGeospatial.com.

## 4 WHAT DOES THIS POLICY COVER?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

This Privacy Policy applies only to your use of Our Site. Our 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.

## 5 WHAT IS PERSONAL DATA?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) 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.

The personal data that we use is set out in Part 7, below.

## 6 WHAT ARE MY RIGHTS?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 12.
- The right to access the personal data we hold about you. Part 12 will tell you how to do this.
- The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 12 to find out more.
- The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 12 to find out more.
- The right to restrict (i.e. prevent) the processing of your personal data.
- The right to object to us using your personal data for a particular purpose or purposes.
- The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.

- The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- Rights relating to automated decision-making and profiling. we do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 16.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner’s Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office. We would however, welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details provided in Part 16.

## 7 HOW DO YOU USE MY PERSONAL DATA?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful bases for doing so:

What we Do	What Data we Use	Our Lawful Basis
Administering our business.	Name, Company Details, Contact Details, IP	Legitimate interests for the processing of a contract or NDA
Supplying our products and services to you.	Topographic and geographic data  Property Data  Remote Sensed data	Legitimate interests for the processing of a contract
Managing payments for our products and Services	Name, Company Details, Bank Details	Legitimate interests for the processing of a contract

Personalising and tailoring our products and services for you	Address	Legitimate interests for the processing of a contract
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With your permission or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and telephone with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

Third Parties (including Google and YouTube) whose content appears on Our Site may use third-party Cookies, as detailed below in Part 14. Please refer to Parts 14 and 15 for more information on controlling cookies. Please note that we do not control the activities of such third parties, nor the data that they collect and use themselves, and we advise you to check the privacy policies of any such third parties.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 16.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

## 8 HOW LONG WILL YOU KEEP MY PERSONAL DATA?

We will not keep your personal data for any longer than is necessary considering the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long we Keep It
Identity Information including eg name, title, gender	Only data relating to an employee or business contacts is retained. Employee is 6 years from cease of employment, business is as below
Contact information including address, email address, telephone number	Unless relating to business contact or employment. 2 years from end of project
Business information including business name, job title and profession	Not fixed, reviewed annually
Payment information including bank details and bank account numbers	6 years

## 9 HOW AND WHERE DO YOU STORE OR TRANSFER MY PERSONAL DATA?

We will only store or transfer your personal data within the UK. This means that it will be fully protected under the Data Protection Legislation.

Please contact us using the details below in Part 16 for further information about the particular data protection mechanism used by us when transferring your personal data to a third country.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner’s Office where we are legally required to do so;

## 10 DO YOU SHARE MY PERSONAL DATA?

We will not share any of your personal data with any third parties for any purposes, subject to the following exception.

- If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

If any of your personal data is shared with a third party, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## 11 HOW CAN I ACCESS MY PERSONAL DATA?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

Subject access requests can be made verbally or in writing and sent to the email or postal addresses shown in Part 16.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month and, in any case, not more than one month from receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.



## 12 HOW CAN I CONTROL MY PERSONAL DATA?

In addition to your rights under the Data Protection Legislation, when you submit personal data via Our Site, you may be given options to restrict Our use of your personal data. In particular, we aim to give you strong controls on Our use of your data for direct marketing purposes.

## 13 CAN I WITHHOLD INFORMATION?

You may access certain areas of Our Site without providing any personal data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

You may restrict our use of Cookies. For more information, see Parts 14 and 15

## 14 HOW DO YOU USE COOKIES?

Our Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

By using Our Site, you may also receive certain third-party Cookies on your computer or device. Third party cookies in embedded content. Please note that during your visits you may notice some cookies that are not related to us. We sometimes embed content from social media and other third party websites. These may include YouTube, Vimeo, Twitter, Facebook etc. As a result, when you visit a page containing such content you may be presented with cookies from these websites and these third party cookies may track your use of our website. We do not control the dissemination of these cookies and you should check the relevant third party's website for more information.

All Cookies used by and on Our Site are used in accordance with current Cookie Law.

Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be "strictly necessary". These Cookies are shown in the table below. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser's settings as detailed below, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

Google Maps

[Google's Privacy Policy](#)

Name	Data stored	Purpose	Expires
SID, SAPISID, APISID, SSID, HSID, NID, PREF	Various unique identifiers, except for PREF which stores your options such as preferred zoom level.	Google set a number of cookies on any page that includes a Google Map. While we have no control over the cookies set by Google, they appear to include a mixture of pieces of information to measure the number and behaviour of Google Maps users.	Most of the cookies expire 10 years after your last visit to a page containing a Google Map.

Youtube

Name	Data stored	Purpose	Expires
SID, LOGIN_INFO, use_hotbox, PREF, SSID, HSID, watched_video_id_list, __utma, __utmz, demographics, VISITOR_INFO1_LIVE	Various unique identifiers, as well as login information that may relate to a Google account.	Google set a number of cookies on any page that includes a Youtube video. While we have no control over the cookies set by Google, they appear to include a mixture of pieces of information to measure the number and behaviour of Youtube users, including information that links your visits to our website with your Google account if you are signed in to one. Information about your use of our website, including your IP address, may be transmitted to Google and stored on servers in the United States. This cookie does not identify you personally unless you are logged into Google, in which case it is linked to your Google account.	Most of the cookies expire 10 years after your last visit to a page containing a Youtube video, although some expire sooner.

## Google reCaptcha

These are essential cookies, used by the Google reCAPTCHA (v3) service used in our forms to stop submissions from spammers.

Name	Data stored	Purpose	Expires
NID	unique ID	Unique ID used to remember preferences and also sometimes to customize ads	Various but tend to be approximately 6 months
CONSENT	unique ID	Used by Google for cookie consent settings	20 years

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 including, but not limited to, login and personalisation settings.

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.

## 15 HOW TO TURN COOKIES OFF?

Internet browsers allow you to change your cookie settings. These settings are usually found in the 'options' or 'preferences' menu of your internet browser. In order to understand these settings, the following links may be helpful. Otherwise you should use the 'Help' option in your internet browser for more details.

[Cookie settings in Internet Explorer](#)

[Cookie settings in Firefox](#)

[Cookie settings in Chrome](#)

[Cookie settings in Safari](#)

## 16 HOW DO I CONTACT YOU?

To contact us about anything to do with your personal data and data protection, please use the following details (for the attention of the Data Protection Officer):

Email address: [mslade@imgeospatial.com](mailto:mslade@imgeospatial.com).

Postal Address: c/o The Oakley, Kidderminster Road, Droitwich, England, WR9 9AY

## 17 CHANGES TO THIS PRIVACY POLICY

We may change this Privacy and Cookie Policy from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

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