



Privacy & Cookies Policy

About IRIS Group Aero Ltd

IRIS Group Aero Ltd (Company registration number **09598086**) is a company that provides managed solutions that include services that utilise unmanned air systems (UAS), aerial and ground imaging, security products, security services and training.

Our registered address is: 4 Whittle Court, Knowlhill, Milton Keynes, Buckinghamshire, MK5 8FT.

Contact email address: david.cummins@irisgroup.aero

We have created this privacy and cookie policy in order to demonstrate our firm commitment to privacy. The following policy discloses the information that we gather and how we disseminate it, in relation to our website (www.irisgroup.aero) and in the manner that we conduct our business.

Throughout this document "IRIS", refers to IRIS Group Aero Ltd. "You" and "your" refers to you as the user.

About this notice.

This privacy notice tells you what to expect when we collect personal information about you.

IRIS understands that your privacy is important to you and that you care about how your personal data is used. We are data controllers and data processors for the purposes of GDPR legislation. We respect and value the privacy of everyone who visits this website, www.irisgroup.aero 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.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is deemed to occur upon your first use of this website requested, along with any online training courses linked to it is via related learning management sites. If you do not accept and agree with this Privacy Policy, you must stop using this website and any related learning management systems immediately.

Definitions

'Website' is the <https://www.irisgroup.aero> website operated by IRIS Group Aero Ltd.

'Learning Management System' or 'LMS' is the online training portal run by IRIS at www.irisgroupaero.online

'Personal Data' means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).

'Cookies' are small pieces of data stored on your device (computer or mobile device).

'Data Controller' means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed.

For the purpose of this Privacy Policy, we are a Data Controller of your Personal Data.

'Data Processor' (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller.

We may use the services of various Service Providers in order to process your data more effectively.

'Data Subject' or 'user' is any living individual who is using our Service and is the subject of Personal Data.

What is covered by this notice?

We collect the personal data, such as name, address, contact information, etc of the following types of people to allow us to undertake our business:

- Individual clients;
- Corporate clients;
- Supplier contacts to support our services;
- Employees;
- Consultants, temporary workers;
- Visitors to our website;
- Visitors to our Learning Management System (LMS) and eLearning participants;

We collect this information about you in order to carry out our core business and additional activities.

This privacy notice also covers:

- Security;
- Retention of your personal information;

- Your right to withdraw consent to our processing of your information;
- Your right to access information we hold about you.

This Privacy Policy applies only to your use of this website and related learning management systems. Our website 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.

This will include terms and conditions and privacy notices for sites that we partner with to take payments for courses, such as www.paypal.com . For any third-party sites linked from our website you will need to visit them for clarity on their privacy notice and policies.

Online training course applicants: the information we collect and how we use it.

When you register for a course through our website, or request information pertaining to any services that we can offer, we will gather personal information about you from your registration form and other sources, such as the contact Us form on our website. This is in order to process your registration or enquiry or keep your records on file for the agreed time frame of six months in the event that your enquiry does not lead to any services and two years for successful registrants of online courses.

The information that we gather includes, but is not limited to:

- Identity information, including your first name and last name;
- Your contact information including your personal email address and phone number;
- Your business or home address if it is relevant to any request for services such as security assessments etc;

We hold and use this information in order to:

- Seek your feedback on our services;
- Fulfil our obligations to our clients;
- Update you on other services or online courses that may be relevant to you;

In the event that we gather data about you, this privacy notice will be available upon request by email or by visiting our website where a link can be found on the home page. We welcome contact and enquiries regarding this notice and about how we can protect your data, please use the Contact Us form.

You have the right to amend your communications preferences.

- You can opt-out from marketing communication by informing us of your wish to do so.
- We may share your personal or commercial information with the following:

- Trusted third parties who provide services on our behalf, such as security service providers that we use as partners. These third parties are required to comply with our actions relating to security and confidentiality;
- Online course developer partners;
- Regulatory or law enforcement agencies, when required by law to do so.

We do not share your personal information with third parties who wish to use it for marketing purposes.

Information Automatically Logged.

We use your IP address to help diagnose problems with our server and to administer our Website. Your IP address is also used to gather broad demographic information. We also collect information with regard to referrers and exit points to help diagnose problems with our server and to administer our Website.

All information used for this purpose is shared with our web developer team only, in order to address any issues with website functionality.

Legal basis for the processing of personal data.

We will only use your personal data for the purposes for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purposes 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 email address provided.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purposes 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.

Mapping, biometrics, CCTV and Inspection.

We are aware of GDPR and how this might relate to our mapping, biometrics, CCTV and inspection services. Your likeness or an image of you may be perceived as your personal data, and as such may afford you certain rights under GDPR legislation. If you feel your image or likeness has been used in any of our media and would prefer for it to be removed then please let us know.

Our legitimate business and commercial interests.

Our legitimate interests in collecting and retaining your personal data is as follows:

- As a security services provider we are obliged to conduct extensive research on addresses and businesses, primarily to conduct security assessments.
- To maintain, expand and develop our business we need to record the personal data of online course registrants, and also client and partner contacts.
- When our security services are required then a contract or agreement will be made between IRIS and the client to ensure that all proposed services that are to be carried out are discussed. Prior to any agreement a quotation/s will be issued, which may contain personal or commercial information. If the quotation is approved and the work carried out then an invoice/s, also containing personal or commercial information, will be issued.

Cookies.

A cookie is a small data file that certain web sites write to your hard drive when you visit them. The only personal information a cookie can obtain is information a user supplies him or herself. A cookie cannot read data from your hard disk or read cookie files created by other sites. Cookies, however, enhance our web site performance in a number of ways, including providing a secure way for us to verify your identity during your visit to our web site and personalising your experience on our site, making it more convenient for you.

This web site uses cookies so that we can serve you better. This site uses:

- Google Analytics Tracking: visitor software that uses cookies to track information about how visitors come to the website, which pages they visit, which country and city they are visiting from and other actions that visitors make whilst on the site. This data is then used in order to improve the user experience of the website. All user data collected in this manner is anonymous and used internally by IRIS for monitoring website performance. This information is never shared with any third parties.
- PHPSESSID: This cookie is automatically created via PHP when a session is in use on the site.

Should you wish to do so, you can refuse cookies by disabling them in your web browser's settings, and you do not need to have cookies turned on to successfully use our service. Most browsers are defaulted to accept and maintain cookies and you can set your browser to notify you when you receive a cookie, giving you the chance to decide whether to accept it or not. Please consult the support documentation for your web browser, which can be found online, for more information.

Our website may contain links to external websites operated by other organisations. Those organisations may collect personal information from visitors to their site.

We cannot guarantee the content or privacy practices of any external websites and do not accept responsibility for those websites.

Security.

We are committed to protecting the security of your personal information. We use a variety of measures, including but not limited to: firewalls, antivirus on the PC's that we use and SSL encryption on our website in order to protect your personal information from:

- Improper use or disclosure;
- Unauthorised modification or alteration;
- Unlawful destruction or accidental loss;
- Unauthorised access.

Where your personal data is processed and stored.

The data that we collect from you may be processed and/or transferred to, and/or stored on all IRIS company computers and computers belonging to IRIS key personnel, who will require certain data to make company decisions and referrals for the benefit of clients and partners. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

Retention of your personal information.

We are obliged to retain accurate data and only retain personal data for as long as we need it for our legitimate business interests, in accordance to the legislation.

We do the following to try to ensure our data is accurate:

- Our website enables you to manage your data and to review whether the details we hold about you are accurate;
- Prior to making an introduction we check that we have accurate information about you;
- We keep in touch with you, so you can let us know of changes to your personal data.

Your rights.

You have the following rights:

1. The right to be informed about our collection and use of your personal data. This Privacy Policy 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 email address below.
2. The right to access the personal data we hold about you.
3. The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete.
4. 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.
5. The right to restrict or prevent the processing of your personal data.
6. The right to object to us using your personal data for a particular purpose or purposes.
7. 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.
8. 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.

9. Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

The above rights may be exercised by contacting us at david.cummins@irisgroup.aero

How can you access information we hold about you?

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”.

All subject access requests should be made in writing and sent to the email address shown.

There is not normally any charge for a subject access request. If your request is deemed to be ‘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 and, in any case, not more than one month of receiving it. Please note that in some cases, particularly if your request is 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.

Changes to our Privacy Notice.

We may change this Privacy Notice 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.

Any changes will be immediately posted on this website and you will be deemed to have accepted the terms of the Privacy Policy on your first use of this website following the alterations. We recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on 4th July 2019.

Contact us.

You may contact us about any questions you have in respect of this privacy notice by emailing david.cummins@irisgroup.aero