

# INUKTUN PRIVACY POLICY

## INTRODUCTION

Inuktun takes your privacy very seriously. This Privacy Policy is intended to set out your rights and answer any questions you may have about your personal data. If you need more information, please contact [content@inuktun.com](mailto:content@inuktun.com).

The controller of your data will be Inuktun Services Limited (Inuktun) unless stated otherwise.

Our personal information handling policy and procedures have been developed in line with the requirements of the General Data Protection Regulation (in force May 25, 2018) and applicable national law.

## WHAT INFORMATION DO WE COLLECT?

We collect and process personal data about you when you interact with us and when you purchase goods and services from us. The personal data we process may include any of the following:

- Your name
- Your home or work address, email address and/or phone number
- Your job title
- Your payment and delivery details, including billing and delivery addresses and credit card details, where you make purchases from us
- Information related to the browser or device you use to access our website
- Internet browser and operating system
- Recordings of calls you make to our customer service team
- And/or any other information you provide.

## HOW DO WE USE THIS INFORMATION AND WHAT IS THE LEGAL BASIS FOR THIS USE?

We process the personal data listed above for the following purposes:

- As required to establish and fulfill a contract with you, for example, if you make a purchase from us or enter into an agreement to provide or receive services. This may include verifying your identity, taking payments, communicating with you, providing customer services and arranging the delivery or other provision of products or services. We require this information in order to enter into a contract with you and are unable to do so without it.
- To comply with applicable law and regulation.
- In accordance with our legitimate interests in protecting Inuktun's business interests and legal rights, including but not limited to, use in connection with legal claims, compliance, regulatory and investigative purposes (including disclosure of such information in connection with legal process or litigation).
- With your express consent to respond to any comments or complaints we may receive from you, and/or in accordance with our legitimate interests including to investigate any complaints received from you or from others, about our website or our products or services.

- We may use information you provide to personalize (i) our communications to you, (ii) our website; and (iii) products or services for you, in accordance with our legitimate interests.
- If you provide a credit card, we may also use third parties (such as POS payment providers) to check the validity of the sort code, account number and card number you submit in order to prevent fraud, in accordance with our legitimate interests and those of third parties.
- We may use your information to invite you to take part in market research or surveys.

We may also send you direct marketing in relation to relevant products and services. Electronic direct marketing will only be sent where you have given your consent to receive it, or (where it is allowed) you have been given an opportunity to opt-out. You will continue to be able to opt-out of electronic direct marketing at any time by following the instructions in the relevant communication.

### WITH WHOM AND WHERE WILL WE SHARE YOUR PERSONAL DATA?

We may share your personal data with our subsidiaries to process it for the purposes of inter-group administration and to deliver products or services where elements of these are provided by group companies other than those with which you have directly contracted.

We may also share your personal data with our professional advisors including auditors, lawyers, accountants or other business advisors.

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if needed for the legal protection of our legitimate interests in compliance with applicable laws. Personal data may also be shared with third party service providers who will process it on behalf of Inuktun Services Limited for the purposes above.

In the event that our business or any part of it is sold or integrated with another business, your details will be disclosed to our advisors and those of any prospective purchaser and will be passed to the new owners of the business.

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

We will not keep your personal information for any purpose for longer than is necessary and will only retain the personal information that is necessary in relation to the purpose. We are also required to retain certain information as required by law or for as long as is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions.

Where you are a customer, we will keep your information for the length of any contractual relationship you have with us and ongoing afterwards in line with your purchased product lifecycle for potential future technical support.

Where you are a prospective customer and you have expressly consented to us contacting you, we will only retain your data (a) until you unsubscribe from our communications; or, if you have not unsubscribed, (b) while you interact with us and our content, or (c) for 12 months from when you last interacted with our content.

In the case of any contact you may have with our customer service team, we will retain those details for as long as necessary to resolve your query.

We will retain your data for a short time beyond the specified retention period, to allow for information to be reviewed and any deletion to take place. In some instances, laws may require Inuktun Services Limited to hold certain information for specific periods other than those listed above.

## WHAT ARE MY RIGHTS IN RELATION TO MY PERSONAL DATA?

You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data, clicking the unsubscribe button on any communication we have sent to you or by contacting us.

Where you have consented to us using your personal data, you can withdraw that consent at any time.

If the information we hold about you is inaccurate or incomplete, you can notify us and ask us to correct or supplement it.

You also have the right, with some exceptions and qualifications, to ask us to provide a copy of any personal data we hold about you.

If you have a complaint about how we have handled your personal data, you may be able to ask us to restrict how we use your personal data while your complaint is resolved. In some circumstances you can ask us to erase your personal data (a) by withdrawing your consent for us to use it, (b) if it is no longer necessary for us to use your personal data, (c) if you object to the use of your personal data and we don't have a good reason to continue to use it, or (d) if we haven't handled your personal data in accordance with our obligations.

## WHERE CAN I FIND MORE INFORMATION ABOUT INUKTUN'S HANDLING OF MY DATA?

Should you have any questions regarding this Privacy Policy, about Inuktun's processing of your personal data or wish to exercise your rights you can contact Inuktun's quality team using this email address: [content@inuktun.com](mailto:content@inuktun.com).