



Privacy Statement

Instant Access Europe Limited

March 2024



1. Opening Statement

We at Instant Access Europe Limited put you first and our innovations & service second. That's why making sure you and your end-users privacy are protected is a priority for us. It is important that you understand how and why we use your personal information.

Our privacy policy lets you know how we look after your personal information when you use our services.

This includes how we collect and process the information you give us when you sign up as a customer or otherwise contact us.

We may update our privacy policy from time to time to ensure it matches any changes we make to our internal & external processes. If we do, we will let you know by posting updates on our platform, website and through any other relevant means.



2. Important information

2.1. It is important that you read this privacy policy together with any other privacy policy or other documents we may provide on specific occasions when we are collecting or processing personal data about you / or your end-users to make sure you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

2.2. This version was last updated on 13th March 2024.

2.3. It is important that the personal data we hold about you / or your end-users is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

2.4. Our Digital Services are not intended for children and we do not knowingly collect data relating to children.

2.5. Our platform may include links to third-party websites (e.g. Shipping provider) , plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party services and are not responsible for their privacy statements. When you leave our platform, we encourage you to read the privacy policy of every website when you visit.



3. Who are we?

3.1. We are Instant Access Europe Limited. A company registered in England and Wales. Our company registration number is **11384636** and our registered office is **Office C1, Arena Business Centres, 9 Nimrod Way, Ferndown, Dorset, England, BH21 7UH**. We operate the website (www.instantaccesseurope.com) and provide the IAE Platform. Instant Access Europe is the controller and responsible for your personal data (referred to as 'IAE', 'we', 'us' or 'our' in this privacy policy)

3.2. We operate the eCommerce distribution business known as "IAE". IAE manages the orders generated on our customers websites processing them through our systems and delivering the goods directly to their customers locations. The information that customers use or process via our systems / service may contain personal data. We provide this service as a processor on behalf of our customers who act as the controller of this information used on the platform. It is the responsibility of our customers to determine how this personal data is processed and deleted and to ensure there is a lawful basis for its use. If you have any specific queries or concerns about how this data is handled, you should contact the relevant organisation (our customers) in their capacity as a controller.

3.3. We are bound by applicable data protection laws in respect of the handling and collection of your personal data. We are registered as a data controller with the Information Commissioner's Office (ICO) under registration number ZB286872.

3.4. If you have any questions about the privacy policy, including any requests to exercise your legal right as set out in section 12, please contact us using the contact details in section 13.

4. What information do we collect about you?

4.1. Person data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data) or data relating to a corporate entity.

4.2. We may collect, use, store and transfer different kinds of personal data about you, your staff, end-users or your business. We have grouped together as follows:

- **Identity Data** includes first name, last name, title and delivery address
- **Contact Data** includes business address, billing address, email address(es) and telephone number(s).
- **Transaction data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our platform.



4.3. We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but it is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may analysis product run-rate and geographic areas of consumption.

4.4. We do not collect any Special Categories of Personal Data about you (for example details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and / or offences.

5. What happens if you don't give us your personal information?

When we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide personal data when requested, we may not be able to perform the contract obligations we have or are trying to enter into with you (for example, to provide you with our products or services). In this case, we may have to suspend or cancel a product or service you have with us, we will notify you if this is the case.

6. How do we collect your information?

We may use different methods to collect data from and about you and your end-users through:

6.1. Direct Interactions. You may give us your identity, contact and profile data by filling in forms or by corresponding with us by post, phone, email, online platform or otherwise. This includes personal data you provide when you:

- Set up your account to IAE or purchase any other of our products, apps and services;
- Sign up to become a customer or sign up as customer on behalf of a corporate entity;
- Meet with one of our members of staff to discuss our products and services or otherwise contact us.
- Give us feedback

6.2. Automated technologies or interaction. As you interact with our platform or website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see the section on cookies below.

6.3. Third parties or publicly available sources. We may receive personal data about you from third parties and public sources as set out below:

- Identity and Contact Data from partners who you have given permission to provide such information to upload into our systems so we can provide products and services to you.
- Identity and Contact Data from publicly available sources such as websites of relevant, prospective customers and Companies House



7. How do we use your information?

7.1. We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- **Performance of Contract** means processing your data when it is necessary for the performance of a contract you entered or the steps you took at your request before entering into such a contract.
- **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities for which our interests override the impact to you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess or legitimate interests against any potential impact on you in respect of specific activities by contacting us.
- **Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulator obligation that we are subject to.
- **Consent** means where we have obtained your agreement to process your personal data. Consent must be freely given, specific, informed and be an unambiguous indication of your wishes for us to process your personal data. Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to the possibility of sending marketing material to you via email. You have the right to withdraw consent to marketing at any time by contacting us.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.



Purpose / Activity	Types of data	Lawful basis for processing including basis for legitimate interest
To register you or our customer as a new customer	<ul style="list-style-type: none"> • Identity • Contact • Profile 	<ul style="list-style-type: none"> • Performance of a contract with you. • Necessary for legitimate interests (to provide our products and services to our customers (i.e. when you are company who works for and on behalf of customers)).
<p>To process and deliver orders and provide our services to you or our customer, including:</p> <ul style="list-style-type: none"> • Manage payments, fees and charges • Collect and recover money owed to us • Sending you renewal invoices • Reminding you if an IAE audit is required • Hosting and operating the IAE platform 	<p>Identity</p> <p>Contact</p> <p>Profile</p> <p>Transaction</p> <p>Marketing and communications</p>	<ul style="list-style-type: none"> • Performance of a contract with you, where you are a legal entity. • Necessary for our legitimate interests (to provide our services to our customers (i.e. when you are an individual who works for and on behalf of our customers and to recover debts due to us)).
<p>To manage our relationship with you or our customer which will include:</p> <p>Notifying you about changes to our terms or privacy policy</p>	<ul style="list-style-type: none"> • Identify • Contact • Profile • Marketing and communications 	<ul style="list-style-type: none"> • Performance of a contract with you, where you are a legal entity. • Necessary to comply with a legal obligation. • Necessary for our legitimate interests (to keep our records updated and to study how customers use our products and services).
To administer and protect our business and this platform (including troubleshooting, data analysis, testing, system maintenance,	<ul style="list-style-type: none"> • Identify • Contact • Technical 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (for running our business, provisions of administration and IT



support, reporting and hosting of data)		services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise). • Necessary to comply with a legal obligation.
To use data analytics to improve our platform, products/services, customer relationships and experiences	<ul style="list-style-type: none">• Technical• Usage	<ul style="list-style-type: none">• Necessary for our legitimate interest (to define types of customer for our services, to keep our platform updated and relevant, to develop our business and to inform our marketing strategy).
To respond to requests for information regarding suspected or actual criminal activity including fraud.	<ul style="list-style-type: none">• Identity• Contact• Transaction• Technical• Profile• Usage	<ul style="list-style-type: none">• Necessary for our legitimate interests (to prevent crime and fraud).• Necessary to comply with a legal or regulatory obligation.

7.2. Cookies

Our platform uses cookies to distinguish you from other users of our website. This helps us to provide you with the relevant and meaningful digital experience when you browse our platform to for fill your business function. By continuing to browse the platform, users are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer. We only use (and store) non-essential cookies on your computer's browser of hard drive if you provide your consent.

We use the following cookies:

Cookie	Purpose	Expiration
Session	IAE platform session to authenticate users	Session

Please note that third parties (including, for example, providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.



Except for essential cookies, all cookies will expire as outlined under the expiration column in the table above.

7.3. Change of purpose

We will only use your personal data for purposes for which we collected it, unless we reasonable assume that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation of how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

8. How do we share your personal information?

For the purposes set out in section 7, we may have to share your personal data with the following parties:

8.1. External Third Parties such as:

- Service providers acting as processors based in the UK & USA who provide delivery, IT and system administration services. For example, cloud hosting services and EDI (Electronic Data Interchange) providers.
- Any potential professional advisers acting as processors or joint controllers including lawyers, bankers, auditors, and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators, police, and other authorities acting as processors or joint controllers based in the UK who require reporting of processing activities in certain circumstances (such as criminal activity, suspected or actual fraud or tax evasion)

8.2. Specific Third Parties such as:

- **Automated Commerce Exchange Limited:** Based in the UK with a back-up facility in the UK who provides hosting services for the ACE platform that IAE use to process orders.
- **OVH Cloud, Ltd:** Based in the UK with a back-up facility in the UK who provides hosting services for the ACE platform.
- **BoldVan, Inc :** Based in the US who provide our EDI (Electronic Data Interexchange) services for integration to partners who require EDI functionality.



8.3. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

9. How do we use your personal information internationally?

One of our external third parties are based outside the UK / European Union (EU) so their processing of your personal data will involve a transfer of data outside the EU.

Whenever we transfer your personal data out of the EU, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, to whom we transfer data to and receive data from will have to provide evidence of due diligence that personal data is secured via a recognised level of encryption and authorisation mechanisms.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EU.

10. How do we ensure your personal information is secure?

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

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

11. How long do we store your personal information for?

11.1. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

11.2. 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.

11.3. We will generally retain our customers' data for a period of 6 (six) years after a customer contract has ended, to ensure that we are able to assist you should you have any questions or



feedback in relation to our products or services or to protect, or defend our legal rights, or for tax purposes.

11.4. In case we have processed your data for any other reason (for example when you have contacted us with a question in connection with services), subject to section 11.3, we will retain your data for twelve (12) months.

11.5. In some circumstances you can ask us to delete your data: see section 12.1.3. below for further information.

11.6. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

12. Your legal rights.

12.1. Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are detailed below:

12.1.1. Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

12.1.2. Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

12.1.3. Request erasure of your personal data. This enables you to ask us to delete or remove personal data if there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data if you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

12.1.4. Object to processing of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which overrides your rights and freedoms.

12.1.5. Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) if our use of the data is unlawful but you do



not want us to erase it; (c) if you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data we need to verify whether we have overriding legitimate grounds to use it.

12.1.6. Request the transfer of your personal data (as a data subject) to you or to a third party. We will provide to you, or a third-party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you

12.1.7. Withdraw consent at any time if we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or service to you. We will advise you if this is the case at the time you withdraw your consent.

12.2. No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

12.3. What we may need from you

We may need to request specific information from you to help us to confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you to further information in relation to your request to speed up or response.

12.4. Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is complex or you have made several requests. In this case, we will notify you and keep you updated.



13. Contact Details and Complaints

Our full details are:

Full name and legal entity:	Instant Access Europe Limited
Data Privacy Manager:	Martin Cole
Email Address:	Mcole@instantaccesseurope.com
Postal Address:	Office C1 Arena Business Centres, 9 Nimrod Way, Ferndown, Dorset, England, BH21 7UH

You have the right to make a complaint at any time to the ICO, the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.