

Cyber Major

Privacy Notice

1 Our details

This website is owned and operated by Innovation Major Limited ("the Company", "we", "us", "our"). Software Major, Cyber Major and Design Major are trading names of Innovation Major Limited, a limited company registered in England and Wales under company number 11268423 and whose registered office address is 26 Aurora Building, Blackwall Way, London, United Kingdom, E14 9NZ. Our main trading address is 40 Bank Street, Canary Wharf, London E14 5NR, UK.

2 Introduction

The Company is committed to protecting and respecting your privacy. This Privacy Notice, together with our [Terms and Conditions of Use](#) ("Terms"), our [Cookie Notice](#) and any other documents referred to in it, sets out the basis on which any Personal Data we collect from you or that you provide to us, will be Processed by us. Please read the following carefully to understand our views and practices regarding your Personal Data and how we will treat it.

Each time you access, use, log into or browse <https://www.softwaremajor.com/>, <https://www.cybermajor.net/>, or <https://designmajor.co.uk/> ("our websites"), post content or otherwise interact with the Company through our websites, you agree to be bound by this Privacy Notice. If you do not accept this Privacy Notice, please do not access, use or browse our websites, take any of the foregoing steps or otherwise interact with the Company.

The data Controller of Personal Data collected through or as a result of the use of our websites is Innovation Major Limited at 26 Aurora Building, Blackwall Way, London, United Kingdom, E14 9NZ.

Our Data Protection Officer is Tanja Hentschke. You can contact her at dpo@innovationmajor.com.

3 Definitions

For the purpose of this Privacy Notice, the following definitions have been adopted from the EU Regulation 2016/679 (GDPR).

'Personal Data' means any information relating to a person (a 'data subject') who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.

'Processing, in relation to Personal Data, means any operation or set of operations which is performed on Personal Data or on sets of Personal Data (whether or not by automated means,

such as collection, recording, organisation, structuring, storage, alteration, retrieval, consultation, use, disclosure, dissemination, restriction, erasure or destruction).

'Controller' means a natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the Processing of Personal Data. Only Controllers need to pay the data protection fee.

'Processor' means a natural or legal person, public authority, agency or other body which Processes Personal Data on behalf of the Controller.

4 Information we collect and hold about you

4.1 Information you give us

Most of the personal information we Process is provided to us directly by you for one of the following reasons:

- You register on one of our websites as a Supplier by filling in forms or setting up profiles.
- You become a Supplier to the Company.
- You are corresponding with us by phone, email or otherwise. This also applies for using the contact section of our websites for sending a message or calling our customer service number.
- You subscribe to our newsletter.
- You browse and access content or express an interest in any service listed on our websites.

The information you may give us includes without limitation the following:

- **identity data:** full name, username or other identifiers
- **contact data:** email address, phone number
- **location data:** country, city, postal address and code
- **profile data:** company name, current position in the company
- **marketing and communication data:** newsletter subscription

Not all the above information is mandatory for the use of our websites, some of it is optional for you to provide.

4.2 Information we collect about you

When you visit our websites, we may automatically collect the following information without limitation:

- **technical data:** the Internet Protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- **website usage data:** the full Uniform Resource Locators (URL) clickstream to, through and from our websites (including date and time); pages you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page and any phone number used to call our customer service number; and
- **other information:** collected if necessary, for our legitimate business interests to ensure the proper functioning of our websites and the prudent operation of our business.

Not all the above information is Personal Data on its own but if combined with Personal Data, we will treat the combination as Personal Data.

Most of the above information will be collected via cookies. Please review our [Cookie Notice](#) for more information.

We do not collect any special categories of Personal Data about you (special categories include 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).

4.3 Information we receive from other sources

We may receive information about you from other websites operated by the Company.

We also work closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

We also may receive information about you from other sources, such as social and business networks, blogs, public resources, third parties and other website users. This can include information about you, for example when others share or comment on a post of you or share your contact information.

5 Use of your information

We use your personal data in different ways depending on the purpose.

Where you have explicitly given your consent (for instance as part of the cookies opt-in or the sending of newsletters) we Process your Personal Data for the purposes given as part of the consent.

We do not carry out automated decision making on any of our websites.

We will create a contact profile in our customer relationship management system (CRM) if we see the opportunity to enter into further business relations with you.

The following table shows you how and why we use your personal data including the lawful basis for the processing:

Type of data	Reason for processing	Lawful basis for processing
identity data	for the registration as a Supplier to the Company	performance of a contract
	for the secure identification of Suppliers logging in	legitimate interest
	for fraud prevention and detection	legitimate interest
	for the response to visitor, subscriber or Supplier questions and requests	consent or performance of a contract
	for setting up agreements between Suppliers and the Company	performance of a contract
location data	for the registration as a Supplier to the Company	performance of a contract
	for analysing the Supplier network to support business and marketing decisions and campaigns	legitimate interest
	for setting up agreements between Suppliers and the Company	performance of a contract
contact data	for the registration as a Supplier to the Company	performance of a contract
	for the secure identification of Suppliers logging in	legitimate interest
	for fraud prevention and detection	legitimate interest
	for the response to visitor, subscriber or Supplier questions and requests	consent or performance of a contract

	for the notification of Suppliers about changes to our activities and agreements	performance of a contract
	for sending notifications to visitors, subscribers and Suppliers and about new services similar to the ones they have acquired or enquired about before	legitimate interest
	for sending out newsletters	consent
	for setting up agreements between Suppliers and the Company	performance of a contract
marketing and communication data	to enable subscribers and Suppliers to receive information according to their preferences	consent
	to make suggestions and recommendations to subscribers and Suppliers of our websites about goods or services that may be of interest	consent
technical data	for the protection of our websites and our business	legitimate interest
	for the support of our IT systems administration and security	legitimate interest
	for fraud detection and prevention	legitimate interest
	for the administration of our websites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes	legitimate interest
website usage data	for the performance of data analytics to improve our websites, products/services, customer relationships and experiences	legitimate interest
	to analyse and develop advertisements and advertising campaigns, optimize and determine the effectiveness of content and advertisements, and analyse your interactions with content and advertisements	legitimate interest
	for the administration of our websites and for internal operations, including	legitimate interest

	troubleshooting, data analysis, testing, research, statistical and survey purposes	
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Other purposes for Processing your Personal Data are:

- to comply with the law, a legal obligation or process;
- to cooperate with law enforcement or government requests;
- to investigate, prevent or take action regarding suspected illegal activities, fraud or potential threats;
- to exercise legal rights or defend against claims;
- to protect our legitimate interests;
- to protect the rights, safety or property of others.

5.1 Use of information we receive from other sources

We may combine information you give us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the type of information we receive).

5.1.1 Site registration

Where you are providing information for the purposes of viewing and accessing information on third party products and services listed on our websites, we Process your Personal Data at your request prior to registering you on our websites and allowing you to access member only areas of our websites. If you do not provide the required information we will not be able to complete your registration and provide you with access to areas of our websites that can only be accessed by registered members.

5.1.2 Contacting third party manufacturers, Suppliers, operators and service providers

Our websites enable users to browse, view and express an interest in certain products and services listed on our websites which are offered by third party providers. Part of the service we provide to you on our websites is to share your contact details and details of your requirements relating to technologies, associated equipment or services with third parties in connection with a product or service in which you have expressed an interest via our websites by clicking a product listing and viewing the webpage for a product or a service with a view to them providing you with information relating to these products or services (including, but not limited to, providing you with a quote for these products or services) and supplying such products and services to you. When these third parties use your information in this way, they will be acting as

data Controllers of your information and will have their own privacy policies. We do not accept any responsibility or liability for these policies.

6 Disclosure of your information to third parties

The Company does not sell or lease your Personal Data to third parties. Any Personal Data we receive from or collect about you will be Processed and safeguarded under current legislation.

We may share your Personal Data with any member of our group (Drone Major Group Limited), which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We will only share your information with companies if necessary, to deliver services on our behalf. Our third-party service providers support our websites and help us provide and improve our service to you, carry out surveys, and conduct user analysis to understand your needs and preferences. We ask these service providers to keep your Personal Data safe and secure and have contracts with them to only use your Personal Data for the purposes we specify. Our third-party service providers include the organisations that support our technology and marketing vendors.

We may share your Personal Data to selected third parties including:

- email management platforms to enable us to send newsletters and network updates to you;
- advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose specific information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users (for example, we may inform them that 500 people in the UK have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, people in SW1). We may make use of the Personal Data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience;
- analytics and search engine providers that assist us in the improvement and optimisation of our websites.

We will disclose your Personal Data to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your Personal Data to the prospective seller or buyer of such business or assets.
- If we or substantially all our assets are acquired by a third party, in which case Personal Data held by us about our customers will be one of the transferred assets.
- If we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation, in order to enforce or apply our Terms and other

agreements, to protect our own rights, property or safety, or the rights, property and safety of our customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

7 Storage location of your Personal Data

The data that we collect from you is mainly stored on secure servers in the UK but may be transferred to and stored at a destination outside the European Economic Area ("EEA"). It may also be Processed by staff operating outside the EEA who work for one of our subsidiaries or partners. This includes staff engaged in, among other things, the fulfilment of your order, the Processing of your payment details in case of paid services and the provision of support services. 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.

We will put in appropriate adequacy safeguards to protect Personal Data that is transferred outside the EEA. This includes methods such as EU-approved model contractual clauses for inter-company transfers and comprehensive binding corporate rules for intra-company data transfers.

8 Storage duration of your Personal Data

We will hold 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, as a minimum as long as you are a registered member of our websites or any other website operated by the Company.

Appropriate retention periods for Personal Data are determined by considering 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.

For example, If you are receiving or have received paid services from us, we will retain all invoicing information for up to 7 years after the last invoice issued and paid. If you decide to cancel your subscription and leave the platform, we will securely archive your Personal Data, change internal access controls to it and review it for erasure on a determined regular basis.

9 Security of your Personal Data

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share any password with anyone.

The transmission of information via the internet is never completely secure. Although we will do our best to protect your Personal Data, we cannot guarantee the security of your data

transmitted to our websites; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to prevent unauthorised access, such as secure servers with selected access on a need-to-know-basis and two-factor authentication.

10 “Do Not Track” signals

Except as otherwise specified in this Privacy Notice, we do not alter the practices detailed herein based upon your selection of the “Do Not Track” setting or other “opt out” setting or feature that may be offered by your browser.

11 Children

You must be over the age of 16 to become a registered user of our websites. If you are under 16 years old, please do not provide us with your name, contact details or any other information about yourself. If you are between 16– 17, you represent that you have the consent of your parent or legal guardian to use our websites and allow us to collect your Personal Data and use it in accordance with this Privacy Notice.

12 Links on sites and in advertisements

Our websites may contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own terms and conditions of use and privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any Personal Data to these websites.

Our websites may also contain plug-ins from third party offerings such as Facebook, Twitter, Instagram, Pinterest and Google+. We recommend that you review the terms and conditions of use and privacy policies that apply to these platforms prior to clicking on such plugins.

13 Your rights

Under data protection law, you have rights we need to make you aware of. The rights available to you depend on our reason for Processing your information. You can find more information by clicking on the links provided in the following sections. These links lead you to the website of the Information Commissioner's Office (ICO).

13.1 Your right of access

You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions, which means you may not always receive all the information we Process. You can read more about this [right here](#).

13.2 Your right to rectification

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies. You can read more about this [right here](#).

13.3 Your right to erasure

You have the right to ask us to erase your personal information in certain circumstances. You can read more about this [right here](#).

13.4 Your right to restriction of Processing

You have the right to ask us to restrict the Processing of your information in certain circumstances. You can read more about this [right here](#).

13.5 Your right to object to Processing

You have the right to object to Processing if we are able to Process your information because the Process forms part of our public tasks, or is in our legitimate interests. You can read more about this [right here](#).

13.6 Your right to data portability

This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another, or give it to you. The right only applies if we are Processing information based on your consent or under, or in talks about entering into a contract and the Processing is automated. You can read more about this [right here](#).

13.7 How you can exercise your rights

If we are Processing your information for criminal law enforcement purposes, your rights are slightly different.

You can request, at any time, access to the Personal Data we hold about you.

You are not required to pay any charge for exercising your rights, unless requests are manifestly unfounded or excessive.

Please contact us at dpo@innovationmajor.com if you wish to make a request. We will reply within one calendar month as specified by the European Data Protection Regulation (GDPR).

You are responsible for keeping your personal data current. You can update your Personal Data through your member account on our websites.

If you prefer not to receive marketing or promotional emails from us, you can click on the “Unsubscribe” link in any promotional email you receive from us and follow the “Unsubscribe” instructions. Please note that such requests may take up to ten (10) business days to become effective. You may not opt out of receiving communications regarding your purchases, your dealings with our websites or technical information about our websites.

You have the right to lodge a complaint with the Information Commissioner. Their website is at <https://ico.org.uk/>.

14 Changes to our privacy notice

The Company reserves the right to change this Privacy Notice at any time. Should the Privacy Notice be revised, we will post the revised Privacy Notice on our websites and the it will be effective immediately upon posting. Any material changes in the way that we use Personal Data will apply only to information collected thereafter, unless we provide you with notice or obtain your consent in accordance with applicable law.

Where appropriate, changes will be notified to you by email. Please check back frequently to see any updates or changes to our Privacy Notice.

15 Contact us

If you have any queries, comments or complaints regarding this Privacy Notice you can contact us through dpo@innovationmajor.com.

If you need assistance with your account or our websites you can contact us through support@innovationmajor.com contact us through the “Get in Touch” section of this website.