



PRIVACY & DATA PROTECTION: OUR COMMITMENT & FAQs

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Version: May 2021

Overview

Immersive Labs supports customers across the globe stemming from a wide range of industries including government, financial, technology, retail, and healthcare sectors. We understand that the integrity and security of Customer Data is important to our customers, which is why we go to great efforts to protect it. Immersive Labs prioritizes customer trust, and this starts with keeping Customer Data safe.

A short note on Brexit...

Part of the Immersive Labs Group operates in the United Kingdom, and we contract with our EEA-based customers with our UK entity. We expect the United Kingdom to receive an Adequacy Decision from the European Commission in the near future but until then, we can continue to receive personal data from the EEA as usual.

What is Customer Data?

Customer Data is information, including personal data, which is stored in or transmitted via the Immersive Labs platform by, or on behalf of, our customers and their end-users.

We process a minimal amount of Customer Data when our end-users register on the platform. This includes:

- Name
- Email address
- Username
- Profile avatar
- IP address

We also collect Customer Data whilst you are using the platform, this being your answers to the labs and the achievements you make. We do this so you can track your progress on our leader boards.

The data we collect about the way in which you use the platform is helpful to us because it provides valuable insight into the steps we can take to improve the platform and its usability. We make sure that this type of data is aggregated and anonymised so that it can never be used to identify our customers and their end-users. We call this Aggregate Data.

Who owns Customer Data?

In terms of the GDPR, the customer is the controller of Customer Data, and Immersive Labs is a processor. This means that throughout the time that a customer has a subscription to the Immersive Labs platform, the customer retains ownership of, and control over, the Customer Data in its account. Because Aggregate Data is not a type of personal data and does not contain confidential information, Immersive Labs is the owner and controller of it.

How do we use Customer Data?

We use Customer Data to operate and improve our platform, help customers access and use the platform, respond to customer inquiries, ask for feedback and send communications related to our services.

For more detailed information about the way in which we use Customer Data, please read our privacy notice available at www.immersivelabs.com/legal.

Where is Customer Data stored?

We use Amazon Web Services (AWS) to host our platform. Customer Data is stored in the AWS EU-West 1 Ireland region data centre.

What measures do we take to secure Customer Data?

- **Encryption:** Customer Data is encrypted at rest and in transit using AES – 256. For data in transit the protocol is TLS 1.2.
- **Hosting:** We host our platform on AWS which places Customer Data in its data centres in Ireland. Using AWS means we take advantage of their rigorous security standards, and reliance, servers and firewalls are always up to date. AWS has SLAs regarding availability, and there is access control in place and security groups to protect the production environment.
- **Passwords:** Passwords are encrypted, and we enforce complexity requirements, being 12 characters in length, including capital letters and onespecial character.
- **Disclosure of Customer Data:** We only disclose Customer Data to third parties where disclosure is necessary to provide our services or as required to respond to lawful requests from public authorities.
- **Handling:** We perform daily backups of all data contained in the platform, including Customer Data, to prevent data loss. We have in place a disaster recovery plan which is regularly tested. Documents containing Customer Data are automatically classified as confidential and are subject to our highest standards of security.

For further information on our security measures, please see our “Security Measures” page available at www.immersivelabs.com/legal

In our capacity as a processor, how do we respond to requests made by end-users?

If we receive a data subject request from a Customer’s end-user, we will, to the extent applicable law allows, promptly inform the end-user to which the request relates, to contact the Customer (i.e. the controller) to deal with directly. We will not further respond to a data subject request without our Customer’s prior written consent.

What is a sub-processor?

A sub-processor is any third party engaged by Immersive Labs to process personal data on our behalf. We engage sub-processors to secure or improve the platform, and such sub-processors may have access to Customer Data. For example, AWS hosts our platform.

Who are Immersive Labs’ sub-processors?

We maintain an up-to-date list of the names and locations of all sub-processors, including our affiliates, available at www.immersivelabs.com/legal. We are responsible for the acts and omissions of our sub-processors to the same extent that we would be responsible if Immersive Labs was performing the services of each sub-processor directly.

How do we transfer personal data outside the EEA?

In light of the decision by the European Court to invalidate the EU-US Privacy Shield Scheme as an appropriate transfer mechanism under Article 45 GDPR (commonly referred to as “Schrems II”), Immersive Labs transfers Customer Data to its sub-processors located outside the EEA using the

Standard Contractual Clauses, unless the territory in which the sub-processor is located is subject to a decision of Adequacy.

The Standard Contractual Clauses are a set of standard provisions approved by the European Commission which provide a controller with a compliant mechanism to transfer personal data to a processor outside of the EEA. Immersive Labs enters into the Standard Contractual Clauses with its sub-processors as “data exporter” for and on behalf of its customers (in their capacity as controllers). If you would like to enter into the SCCs with us directly, you can do so [here](#).

The new SCCs...

On 12 November 2020, the European Commission published the draft new version of the SCCs for public consultation. The new SCCs are expected to be published in final form in 2021 and until such time, we will continue to enter into the SCCs with our customers and suppliers using the 2010 versions. Once the final versions of the new SCCs are published, we will ensure that for all existing customers and suppliers with whom we have agreed the SCCs and going forward, that the new SCCs will be put in place between us to govern the international transfer of personal data from the EEA.