

Privacy Notice

Immersive Labs 2021 Global Crisis Exercise: Ransomware

Effective from 16 August 2021

This privacy notice tells you how we look after your personal data when you participate in our 2021 Global Cyber Crisis Simulator Exercise (the **Global Event**) and you access the Immersive Labs platform hosted on the globalcrisis.immersivelabs.online domain (**Platform**) as a user.

This privacy notice tells you what personal data Immersive Labs collects about you when you participate in the Global Event, what we use it for and who we share it with. It also explains your rights and what to do if you have any concerns. We have a general [Privacy Notice](#) which governs the way we process personal data about you when you visit our website (www.immersivelabs.com) (**Website**) and access our Platform as a general user outside the Global Event.

This privacy notice will supplement any other notices you receive from us (as above) and they should be read together. We may need to make changes to this notice to reflect any changes to our services or legal requirements. We will notify you of any important changes before they take effect.

1. WHO WE ARE AND OTHER IMPORTANT INFORMATION

We are Immersive Labs Group (**Immersive Labs, we, us or our**) which is formed of the following companies:



Immersive Labs Holdings Limited (registered in England and Wales under company number 11439032 with its registered office at Runway East, 1 Victoria Street, Bristol, BS1 6AA, England)



Immersive Labs Limited (registered in England and Wales under company number 10553244 with its registered office at Runway East, 1 Victoria Street, Bristol, BS1 6AA, England)



Immersive Labs Corporation (registered in Delaware, USA with its office at WeWork, 200 Berkeley St, Boston, 02116 MA, USA)



Immersive Labs GmbH (registered in Düsseldorf, Germany with its office at c/o RSM GmbH, Georg-Glock-Straße 4, 40474 Düsseldorf)

In relation to our Platform, Immersive Labs will be 'controller' of your information, which means that it decides what personal data we collect from you and how it is used. Immersive Labs Ltd is registered with the Information Commissioner's Office, the UK regulator for data protection matters under number ZA281110.

CONTACT DETAILS

Email address: legal@immersivelabs.com

Postal address: Runway East, 1 Victoria Street, Bristol, England, BS1 6AA

KEEPING US UPDATED

We want to make sure that your personal data is accurate and up to date. Please let us know about any changes so that we can update our systems for you.

THIRD-PARTY LINKS

Our Platform may include links to external websites, plug-ins and applications provided by other organisations. By clicking on those links or enabling connections you may allow those organisations to collect or share personal data about you. We do not control how these organisations use your personal data, so we encourage you to read their privacy notices.

2. THE PERSONAL DATA WE COLLECT ABOUT YOU

Personal data means any information which does or could be used to identify a living person. We have grouped together the types of personal data that we collect below:



Identity Data – name, gender, age



Contact Data - business email address, personal email address or academic email address



Transaction Data - details of products and services we have provided to you



Technical Data - 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 on the devices you use to access our Platform



Profile Data - your username and password, your interests, preferences, feedback and survey responses



Usage Data - information about your visit including the full Uniform Resource Locators (URL) clickstream to, through and from our site, reports, information you viewed or searched on our Platform, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs, crisis sim completion activity and methods used to browse away from the page)



Marketing and Communications Data - your preferences in receiving marketing from us and our third parties and your communication preferences



Professional Information – job title, department, industry, number of years' experience, size of employer organisation and location

For the purposes of the Global Event, we will perform analysis on the Usage Data and Professional Information we collect from your participation in the relevant Cyber Crisis Simulator. For more information about how we will use this data, please see Section 11 below (How we will use your Usage Data and Professional Information).

3. HOW YOUR PERSONAL DATA IS COLLECTED

- **Direct interactions:** You provide your personal data to us by filling in forms or by corresponding with us by post, phone or email when you:
 - apply for our products or services
 - create an account on our platform
 - subscribe to our service or publications
 - allow us to send you marketing
 - enter a competition, promotion or survey
 - give us some feedback
- **Automated technologies or interactions:** As you interact with our Platform, we automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Some cookies are strictly necessary for us to provide our Platform, therefore if you disable them, the Platform may not work as it should
- **Information provided by others.** We may receive personal data about you from:
 - technical service providers, acting as our processors (which means they can only use your personal data in line with our instructions)
 - organisations such as your prospective employer if they are a customer of Immersive Labs

4. HOW WE USE YOUR PERSONAL DATA

We are required to identify a legal basis for collecting and using your personal data. There are six legal grounds which organisations can rely on. The most relevant of these to us are where we use your personal data:

- to enter into and perform our **contract** with you (but only where the contract is with you as an individual, not a contract with another organisation)
- to comply with a **legal obligation** that we have
- to pursue our **legitimate interests** (our justifiable business aims) but only if those interests are not outweighed by your other rights and freedoms (for example, your right to privacy)
- to do something that you have given your **consent** for

This table sets out the legal ground that we rely on when we use your personal data for different purposes:

Purpose	Categories of personal data	Legal ground
Taking steps to enter into the contract with you	Identity Data Contact Data	Performance of contract

Handling requests for technical support	Identity Data Contact Data Marketing and Communications Data	Performance of contract (as necessary to perform our contractual obligations to provide technical support)
Administering and protecting products, services and systems (and those of our processors)	Identity Data Contact Data Profile Data Usage Data Marketing and Communications Data	Legitimate interests (necessary to provide our products and services, monitor and improve network security and prevent fraud)
Providing insights on how our products and services are being used	Identity Data Contact Data Technical Data Profile Data Usage Data	Legitimate interests (to collect data about users' engagement with the Platform and the Global Event)
Collect benchmarking information about users' participation in the Global Event	Identity Data Contact Data Technical Data Profile Data Usage Data	Legitimate interests (to analyse data about users' engagement with the Platform and the Global Event to provide benchmarking statistics)
Sending you service emails relating to the Global Event once you've registered on the Platform	Identity Data Contact Data Technical Data	Performance of a contract Legitimate interests (necessary to provide our products and services)
Sending you marketing communications by email	Identity Data Contact Data Technical Data Professional Information	Legitimate interests (where your email address belongs to an organisation which is a corporate body)

Asking you to participate in surveys and other types of feedback	Identity Data Contact Data Technical Data Profile Data Usage Data	Consent
Notifying you about changes to our privacy notice or terms and conditions	Identity Data Contact Data Profile Data	Legal obligation (necessary to comply with our obligations under data protection law)

If we plan to use personal data for a new purpose not in the table above, we will let you know beforehand and explain what legal ground we intend to rely on.

5. WHO WE SHARE YOUR PERSONAL DATA WITH

- **Our staff** (our employees or other workers bound by contracts containing strict confidentiality and data protection obligations) – some of our staff may work for one of our group companies
- **Our technical service providers** including hosting, customer support, marketing and customer relationship, software monitoring, project management and customer insight providers (these organisations only have access to information they need to provide their services to us and are bound by contracts containing strict confidentiality and data protection obligations). For a list of our Processors (defined below), please see the section titled “Privacy” in the legal section of our Website.
- **Our professional advisers** such as the accountants or legal advisors we sometimes use to help us conduct our business
- **Any actual or potential buyer of our business**

If Immersive Labs are asked to provide personal data in response to a court order or legal request (e.g. from the police), we would seek legal advice before disclosing any information and carefully consider the impact on your rights when providing a response.

6. WHERE YOUR PERSONAL DATA IS STORED

Where we instruct organisations to process personal data on our behalf (our **Processors**) and that results in your information being sent outside of the UK or European Economic Area (EEA), we make sure that your information receives a similar level of protection by:

- only sending information to [countries that have been formally recognised by the European Commission as having an adequate level of protection](#) for personal data
or
- using [contracts approved by the European Commission](#) to ensure appropriate safeguards are in place

You can ask us for more information if you have a question about information sent outside the UK or EEA.

7. THIRD-PARTY MARKETING

We will get your consent before we share your personal data with any person outside Immersive Labs for marketing purposes.

8. COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. You can also ask us to disable the cookies (and other similar technologies) that we place on your browser when you interact with the Platform and Website. If you disable or refuse cookies, please note that some parts of this Platform may become inaccessible or not function properly. For example, we will be unable to provide you with a report post the Global Event containing data about your participation in the Global Event.

For more information about the cookies we use, please see our [Cookie Policy](#).

9. HOW WE KEEP YOUR PERSONAL DATA SECURE

We have implemented security measures to prevent your personal data from being accidentally or illegally lost, used or accessed by those who do not have permission. These measures include:

- access controls and user authentication
- internal IT and network security
- regular testing and review of our security measures
- staff policies and training
- incident and breach reporting processes
- business continuity and disaster recovery processes

For further information about our security measures, please see the section titled “Security Measures” in the legal section of our Website.

If there is a breach of security which has affected your personal data, we will notify the regulator and keep you informed (where required under data protection law).

10. HOW LONG WE WILL KEEP YOUR PERSONAL DATA FOR

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.

To determine the appropriate retention period for personal data, we consider the volume, 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 use your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We may keep Identity Data, Contact Data and certain Marketing and Communications Data (specifically, any exchanges between us by email or any other means) for up to six years after the end of our contractual relationship with you to help us bring or defend any legal proceedings.

For a list of all retention periods please email legal@immersivelabs.com.

11. HOW WE WILL USE YOUR USAGE DATA AND PROFESSIONAL INFORMATION

As part of the Global Event, we will collect Usage Data about the ways in which you interact with the Platform and your participation in the relevant Immersive Labs Cyber Crisis Simulator(s).

We will analyse the Usage Data to perform analytics and provide statistical reporting about the capabilities of cyber security workforces across the globe according to the industries in which they operate.

We will share the Usage Data externally in an aggregated and anonymous format (which means we will remove any personal data so that it can no longer identify you as an individual or the specific organisation you work for) (**Benchmarking Data**). This helps us identify and publish trends (for example, what percentage of users would pay the ransom). Data protection law does not restrict us when it comes to how we use Benchmarking Data and the various rights described below do not apply to Benchmarking Data .

We will share the Benchmarking Data for (including but not limited to) data analytics or other lawful business purposes and we will use it in external marketing material as we see fit in our sole discretion.

If you would not like us to use your Usage Data for Benchmarking Data purposes, please do not participate in the Global Event.

12. YOUR RIGHTS

You have specific rights when it comes to your personal data:



Access: You must be [told if your personal data is being used](#) and you can [ask for a copy of your personal data](#) as well as information about how we are using it to make sure we are abiding by the law



Correction: You can [ask us to correct your personal data](#) if it is inaccurate or incomplete. We might need to verify the new information before we make any changes.



Deletion: You can [ask us to delete or remove your personal data](#) if there is no good reason for us to continuing holding it or if you have asked us to stop using it (see below). If we think there is a good reason to keep the information you have asked us to delete (e.g. to comply with regulatory requirements), we will let you know and explain our decision.



Restriction: You can [ask us to restrict how we use your personal data](#) and temporarily limit the way we use it (e.g. whilst you check that the personal data we hold for you is correct)



Objection: You can [object to us using your personal data](#) if you want us to stop using it. We always comply with your request if you ask us to stop sending you marketing communications but in other cases, we decide whether we will continue. If we think there is a good reason for us to keep using the information, we will let you know and explain our decision.



Portability: You can [ask us to send you or another organisation an electronic copy of your personal data](#)



Complaints: If you are unhappy with the way we collect and use your personal data, you can complain to the [UK Information Commissioner's Office](#) but we hope we can help in the first instance. If you have any concerns you can email us at legal@immersivelabs.com.

It is usually free for you to exercise your rights and we aim to respond within one month. We might ask you to verify your identity before we begin working on your request as part of our security measures (to keep personal data safe).

It might take us longer to deal with more complicated requests or where multiple requests are made at the same time, but we will always let you know first and will only ever extend the deadline by a maximum of two months.

The only time we charge a fee or refuse to respond is if we feel the request is unfounded or excessive, but we will always let you know and explain our decision.

If you want to make any of the right requests above, you can reach us at legal@immersivelabs.com.

13. MARKETING

We only undertake direct email marketing to corporate subscribers (which means you've registered for the Global Event using a business email address). We do this under the lawful basis of legitimate interests (please see the table in Section 4 above).

Our direct marketing communications will always include a link so you can unsubscribe at any time.

We sometimes use your information to form a view on what products, services or offers we think you might be interested in.

We may contact you if your recent activity suggests you might want to hear from us (for example, you entered one of our competitions), unless you have already let us know you do not wish to receive marketing communications.
