Matter.

Policy

Personal Data, Privacy and Cookies

Document control	
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1. Purpose

1.1 Inheriting Earth Limited Matter (trading as and referred to in this Policy as Matter) is registered in England and Wales under company number 11424510.

1.2 Matter is dedicated to complying with all relevant data protection laws, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

1.3 This Personal Data, Privacy and Cookies Policy (this Policy) explains how Matter collects, uses, discloses, and protects your Personal Data when you are employed by Matter, engage with Matter services, visit Matter website, or communicate with Matter.

2. Questions and contact details

If you have any questions or concerns about this Policy or how Matter handles your Personal Data, we will aim to respond to all requests within thirty working days that are submitted as below:

Email	legal@matter.industries
Phone:	+44 (0)117 403 8199
Registered company address:	Matter, Unit 5, Avon Trading Estate, St Philips, Bristol, United Kingdom BS2 0XA

3. Scope

This Policy:

3.1 applies to all Personal Data Processed by Matter; and

3.2 is designed to ensure Matter complies with UK data protection laws (primarily the UK GDPR and Data Protection Act 2018) but applies to all Data Subjects whose Personal Data we process, regardless of their location.

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4. Definitions

The following terms used in this Policy have the following meanings:

Consent:	A freely given, specific, informed, and unambiguous indication of the Data Subject's wishes by which they signify agreement to the Processing of their Personal Data.
Cookies:	Small text files that: • are placed on a device when visiting the Matter website • are used to enhance user experience and collect information about browsing behaviour • collect information about how an individual device interacts with Matter website, allowing us to remember preferences and provide a more personalised experience
Data Controller:	The organisation that determines the purposes and means of Processing Personal Data (in this case, Matter).
Data Processor:	A third party that Processes Personal Data on behalf of the Data Controller.
Data Subject:	Any living individual whose Personal Data is Processed by Matter.
Personal Data:	Any information relating to an identified or identifiable individual from which that individual can be identified including in relation to, but not limited to, customers, clients, employees, contractors, suppliers, and third-party service providers. This can include, but is not limited to, name, address, email, phone number, financial details, or IP address; contact details, financial information, online identifiers, and employment records, collected through our website, communications, contracts, or other interactions.
Processing (or Processes):	Any operation or set of operations performed on Personal Data, such as controlling, collection, storage, use, disclosure, or deletion.
UK GDPR:	The United Kingdom General Data Protection Regulation, which governs the Processing of Personal Data within the UK.

5. Your rights

Under UK GDPR, you have certain rights regarding your Personal Data, including:

- **Access:** You have the right to access a copy of the Personal Data we hold about you

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- **Rectification:** We must correct any inaccuracies (of which you notify us) in your Personal Data
- **Erasure:** In certain circumstances, you may request the deletion of your Personal Data
- **Restriction of Processing**: You may require us to limit how we use your Personal Data
- **Data Portability:** You have the right to review your Personal Data in a structured, machine-readable format
- **Objection:** You can object to the Processing of your Personal data in certain situations
- **Complain:** You can complain to the UJK Information Commissioner's Office (ICO)

6. What Personal Data do we collect

We may Process the following types of Personal Data:

- **Personal Identification Data**: Name, contact details (email, phone number, address)
- **Business Information**: Job title, company name, and other work-related data
- **Financial Information:** Bank details, transaction history, and payment information (if applicable)
- **Website Data**: IP address, browser type, and activity on our website, partner websites such as trade forums where we have advertised and social media, including the use of cookies and similar technologies.
- **Sensitive Personal Data**: If you are an employee of Matter, we will hold permitted health and other sensitive personal data within our HR systems.
- **Other Information:** Any information you voluntarily provide to us through communication, surveys, or customer support including IP address; device information; browser type and version; operating system; website usage data; webpages visited; time spent on pages; referral sources; cookie and tracking data; email opens and clicks; form submissions; downloaded content; webinar attendance; event participation; website interactions and marketing preferences; attendance records; questions submitted during events and feedback/ survey responses.

7. How do we collect your Personal Data

- Matter HR systems (if you are an employee of Matter)
- Information provided through contact forms
- Event and webinar registrations
- Survey responses
- Enquiries and communications with us
- Cookies

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8. How do we use your Personal Data

Unless we have obtained your explicit consent for other uses, we use your Personal Data only for the following purposes:

- To manage the Matter personnel (if you are an employee of Matter)
- To provide, improve, and personalise our services to you
- To manage customer and prospective customer relationships
- To communicate with you regarding our services, offers, and updates
- To process transactions and manage billing
- To comply with legal and regulatory obligations
- To analyse and improve the performance of our website and customer experience
- To process registrations for events, webinars and other activities
- To improve our website, communications and user experience
- To analyse website performance and visitor behaviour
- To send marketing communications
- To protect the security and integrity of our business and website

9. The legal basis for Processing your Personal Data

We Process your Personal Data solely on the basis of our legitimate interests in operating and growing our business and maintaining relationships with prospective and existing customers but we will always ensure we do not override your rights and freedoms. So we only Process your Personal Data on the following legal basis:

- **Contractual Necessity:** To fulfil the contracts we have with you
- **Legal Compliance**: Where we are required to comply with legal or regulatory obligations
- **Consent:** Where you have explicitly given your consent (e.g., for marketing communications)
- **Legitimate Interests:** To operate our business and improve our services, where these interests do not override your rights including:
    a) responding to enquiries, managing customer relationships, promoting our products and services, hosting events and webinars, improving our website and communications, and understanding how visitors engage with our content/ newsletters.
    b) where you download our content or register for an event, we may send you information about our products, services, insights, events and company updates where permitted by law.

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c) using a combination of platforms to manage marketing engagement and sales activity including website forms; marketing communications; newsletter subscriptions; content downloads; event registrations; webinar registrations; marketing automation and lead management.

10. How we share your Personal Data

10.1 We do not sell, trade, or rent your Personal Data to third parties.

10.2 However, we may share your information with:

a) Government authorities, regulators or law enforcement agencies where required by law or to protect our legal rights.
b) Service Providers who perform functions on our behalf, such as IT support, payment processors, and marketing agencies including: HubSpot; Nutshell CRM; Google Analytics; LinkedIn; Event management platforms; Webinar hosting providers; Professional advisers and Technology and hosting providers.
c) Other third parties but only if you have explicitly provided your consent.

10.3 Our third-party service providers are required by contract and law:

a) to keep your Personal Data secure and use it only for the purposes specified in this Policy; and
b) to implement appropriate security measures to process Personal Data in accordance with applicable personal data protection laws.

11. International data transfers

Where necessary, we may transfer your Personal Data to countries outside the UK. If we do so, we will ensure that adequate contractual safeguards are in place to protect your Personal Data in accordance with UK GDPR requirements.

12. Data retention

We will retain your Personal Data for as long as necessary to fulfil the purposes specified in this Policy for which it was collected, including satisfying legal, regulatory, accounting and reporting requirements or as required by law. When we no longer need your Personal Data, we will securely delete or anonymise it.

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13. Security of your data

We take the security of your Personal Data seriously. We use appropriate technical and organisational measures to protect it from unauthorised access, misuse, alteration, disclosure, or destruction or unauthorised access. However, no method of transmission over the internet is completely secure, and we cannot guarantee the absolute security of your Personal Data.

14. Cookies

14.1 Types of Cookie:

Matter uses the following four categories of Cookies:

- **Essential Cookies**: These are necessary for the proper functioning of our website. Without these cookies, some parts of the site may not work properly
- **Performance and Analytics Cookies**: These cookies help us understand how visitors use our website, such as which webpages are visited most often, and allow us to improve its performance
- **Functionality Cookies**: These cookies allow our website to remember choices you make (such as language or region) and provide enhanced features
- **Targeting/Advertising Cookies**: These cookies are used to deliver relevant advertisements to the user and measure the effectiveness of our marketing campaigns

14.2 How we use cookies:

Where practical, data collected from Cookies is aggregated and does not directly identify individual users but we may collect Personal Data to:

- Improve website functionality and analyse website usage
- Track website usage and engagement and recognise repeat visitors to our website
- Remember user preferences and settings in order to improve user experience across the website
- Associate website activity with form submissions
- Understand how visitors interact with our website content
- Measure campaign effectiveness and improve the relevance of our communications and advertising
- Support lead generation and customer engagement activities
- Improve the effectiveness of our communications and campaigns
- Support marketing activities, automation and reporting

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14.3 Personal Data collected by Cookies

We use cookies to collect the following data to understand how visitors use our website:

- Number of website visits
- Pages viewed
- Session duration
- Traffic sources
- Device information
- General geographic location
- Conversions
- Audience characteristics
- Advertising performance

15. Updating this Policy

Matter is committed to continuously evaluating the effectiveness of this policy. We will also update this Data Privacy Policy from time to time to reflect changes in our practices or legal obligations.

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