

1. Introduction

Peregrine Immigration Management Ltd, a CIBT company, develops and supplies cloud-based software for global immigration management.

Peregrine is committed to providing excellent service to **visitors to our website**. We recognize that it is our responsibility to protect your privacy and to inform you of our information collection practices through this Personal Data Protection Notice.

You can contact us at info@peregrineimmigration.co.uk.

This notice is written in accordance with the Data Protection Act 1998 and the EU General Data Protection Regulation 2018.

Our Personal Data Protection Policy governs our storage and processing of your data.

Peregrine is a Controller of the personal data you (data subject) provide us through this website.

We are certified to the ISO27001 information security standard.

2. What data do we collect and how?

2.1 Personal data collected

The type of personal data that we collect from you include:

- Contact information (name and email address);
- Technical data (login information, domain name or IP address, URL, http response code, and the date and duration of website visits);
- Marketing preferences (Consent to receive immigration news alerts by email).

2.2 Cookies.

Cookies are bits of text that are placed on your computer's hard drive when you visit certain websites. Most browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to disable existing cookies.

- We use **csrftoken** on our Immiguru and Immigo login pages, as a necessary part of our service. Immiguru and Immigo users actively click "Accept" or "Don't accept" buttons to give or withhold their consent to the use of cookies to help their computer remember when they are logged in, and to ensure that requests to Immiguru are coming from that computer, **in performance of contracts with our software clients**.

2.3 Log files

Log files are web server files (containing information such as domain name or IP address, URL, http response code, or the date and duration of your visit) that are automatically created when an Internet user visits a website. An IP address is a unique identifier that certain electronic devices use to identify and communicate with each other on the Internet.

When you visit our website, our servers log your IP address. Log files are necessary *for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise.*

2.4 “Contact us” form

If you wish to email us through our “Contact us” form, we request your name and email address. By providing these, you **consent** to Peregrine contacting you by email in response to your questions and comments. You may choose to provide additional information as well.

2.5 News alert subscribers

If you wish to receive notification by email of immigration news alerts, company news and product updates, you need to enter your email address into the box on our [News](#) page and click the “Subscribe” button. By so doing, you **consent** to Peregrine sending you these kinds of communications.

2.6 If you fail to provide personal data

Where we need to collect personal data and you fail to provide that data when requested we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with relevant services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

If at any time you wish to **opt out** of receiving news alerts from us, please contact us by email at info@peregrineimmigration.co.uk.

3. What do we do with your data?

3.1 Location and Security

Peregrine is certified to the ISO 27001 Information Security Standard.

Personal data is processed in the United Kingdom (in the European Union). Hosting and storage of personal data takes place on secure, virtual servers in outsourced data centres, which are located in the United Kingdom (in the European Union) and are managed by multiple hosting providers.

The hosting providers and datacentres are either ISO 27001 or SOC 2 compliant and maintain strict security protocols. The choice of hosting provider and agreement is reviewed regularly to ensure that they meet the Information Security Objectives

3.2 Sharing

We do not share your personal data with any third-party service providers to process data on its behalf.

We may share the information you provide with our affiliates (other CIBT companies). This may involve sharing your data outside the EEA.

Whenever we transfer your personal data out of the EEA, 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 transfer data to the US, we may only do so if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

We may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We may share your information with the law enforcement authorities or other government officials if we are required to do so by law or legal process.

3.3 How long do we keep your data?

We are required to keep your data for as long as necessary to fulfil the purposes we collected it for, according to our Data Retention Policy. After this period, your personal data will be irreversibly destroyed.

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.

- Any personal data held by us for immigration news and service update notifications will be kept by us until such time that you notify us that you no longer wish to receive this information.
- Personal contact details emailed to us via our “Contact us” form will be kept until the related query is resolved.
- Server logs (containing information such as domain name or IP address, URL, http response code, or the date and duration of your visit) are maintained for one year.

3.4 Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider 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 as to 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.

4. What are your rights?

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data.

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.

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.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where 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 where 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.

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 override your rights and freedoms.

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) where our use of the data is unlawful but you do not want us to erase it; (c) where 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 but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data 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.

Withdraw consent at any time where 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 services to you. We will advise you if this is the case at the time you withdraw your consent. If you wish to exercise any of the rights set out above, please contact us.

What we may need from you