

The Immersive Labs Community Privacy Notice

Effective from 6 June 2024

This privacy notice tells you how we use your information when you access the Immersive Labs Community (Community).

1. INTRODUCTION

At Immersive Labs, we take privacy seriously. This privacy notice tells you what information the Immersive Labs Group (see Section “The Immersive Labs Group” below) (“**Immersive Labs**”, “**we**”, “**us**” or “**our**”) collects about you, what we use it for, and who we share it with when you access the Community. It also explains your rights and what to do if you have any concerns.

We want this privacy notice to help you understand how we use your information and empower you to make informed decisions about the information you decide to share with us. We’d love for you to read the whole notice, but if you don’t, here are the key points:

- Our Community is a public platform and anyone can see your profile, posts, and comments.
- We collect a limited amount of information that can be used to identify you by default. If you want to just browse, you don’t need an account. If you want to create an account to make posts, we don’t require you to give us your real name and we don’t track your precise location.
- Any data we collect is used primarily to provide the Community, which is focused on bringing people together to discuss matters relating to cyber security (which we’re experts in!). We don’t sell your personal data to third parties, and we never work with data brokers.
- You can always request a copy of your data, account deletion, exercise any of your other data protection rights, and request other information about our privacy policies.
- We’ve tried our best to make this privacy notice easy to understand, but privacy notices are sometimes confusing. If you have any questions about how we process your information, please reach out to us at legal@immersivelabs.com.

2. THE INFORMATION WE COLLECT ABOUT YOU

Information you provide to us.

We collect information you provide directly to us when you use the Community. This includes:

<i>Account information</i>	<p>You don't need an account to access the Community, but you will need to create an account to make posts, like content, follow topics and otherwise utilise features of the Community. If you create a Community account, your account will have a username (which you provide), and we will store your email address. Your username is public, and it doesn't have to be related to your real name. You may need to provide a password, depending on whether you register using an email address, or Single Sign-On.</p> <p>When you use the Community, you may also provide other information, such as your full name, a bio, pronouns, location, profile picture, personal notes, and your personal website. Only your bio will be visible to other users when they click on your profile.</p>
<i>Marketing preferences</i>	<p>You will receive notifications in the Community whenever there is new activity on the content and places you follow. You can also choose how many email notifications you receive. You can set these preferences to immediately (which is the default setting), daily digest, weekly digest, or never.</p>
<i>Content you submit</i>	<p>We collect the content you submit to the Community. This includes your posts and comments including saved drafts, your messages with other users (e.g. closed group messages and direct messages), and your reports and other communications with moderators and with us. Your content may include text, links, images, and attachments.</p>
<i>Actions you take</i>	<p>We collect information about the actions you take when using the Community. This includes your interactions with the platform and content, such as comments, likes, follows, and content you report.</p>
<i>Other information</i>	<p>You may choose to provide other information directly to us. For example, we may collect information when you fill out a form, survey, sign up for an event, request customer support or otherwise communicate with us.</p>

Information we collect automatically.

When you access or use the Community, we automatically collect information about you. This includes:

<i>Log and usage data</i>	<p>We may log information when you access and use the Community. This may include your IP address and time zone setting.</p>
<i>Information collected from cookies and similar technologies</i>	<p>As you interact with our Community, we automatically collect Technical Data about your browsing actions and patterns. We collect this personal data by using cookies, and similar technologies. Some cookies are not essential for us to provide our Community but enabling them will allow for a smoother and more tailored experience. For information about our use of cookies, please read our cookie policy.</p>
<i>Location information</i>	<p>We may receive and process information about your location. You can choose to provide your location in your profile settings, or by associating your content with a location. We may also derive an approximate location based on your IP address.</p>

Information collected from other sources.

We may receive information about you from other sources and combine the information we collect about you in our Community with other information we have about you. This includes

Linked services If you are also a user of the Immersive Labs Platform and use the same email address to register for our Community (including if you access our Community via SSO from the Platform), we will use that information to identify you as a user of both the Immersive Labs Platform and our Community.

3. HOW WE USE YOUR INFORMATION

We use information about you to:

- Provide you with access to our Community
- Improve our Community (by monitoring and analysing usage data to understand trends)
- Help protect the safety of our Community and our users, which includes blocking suspecting spammers, addressing abuse, enforcing our Community Terms of Service, our Community Guidelines, as well as comply with applicable law
- Send you technical notices, updates, security alerts, and other support and administrative messages
- Provide customer service
- Communicate with you about information we think will be of interest to you (for more information about how to opt out of these communications, see “your choices” below)

4. OUR COMMUNITY IS A PUBLIC PLATFORM

A lot of the information on our Community is public and accessible to everyone, even without an account.

When you submit content (e.g. a post, or comment) to a public part of the Community, any visitors to and users of the Community will be able to see that content, the username associated with the content, and the date you originally submitted the content. This content and information will also be available in search results on Internet search engines like Google. You should take the public nature of our Community into consideration before posting.

Your Community account has a profile page that is public. Your profile contains information about your activities on our Community, such as your username, prior posts and comments, likes, solutions, badges received, profile display photo or avatar, bio, and how long you have been a member of our Community.

5. WHO WE SHARE YOUR INFORMATION 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, and data 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)
- **Any actual or potential buyer of our business**

If Immersive Labs is 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.

For a list of our Processors (defined below), please contact us at legal@immersivelabs.com.

6. WHERE YOUR INFORMATION IS STORED

We instruct organisations to process personal data on our behalf (our **Processors**) and that may result in your information being sent outside the country in which you are located.

When we transfer the personal data of users in the UK or 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](#) or the UK Government as having an adequate level of protection for personal data (including but not limited to organisations in the USA that participate in the Data Privacy Framework and the UK Extension to it); or
- using [contracts approved by the European Commission and/or the UK Government](#) to ensure appropriate safeguards are in place.

You can ask us for more information if you have a question about the information we transfer internationally.

7. 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

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).

8. YOUR RIGHTS AND CHOICES

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

Accessing and changing your information You can access your information and change or correct certain information through the “Security & Account” section in your profile settings. You can also download a copy of your posts & replies and personal information in these settings. Alternatively, you can ask us to update your information for you or request a copy of all the personal data Immersive Labs maintains about you by contacting us at legal@immersivelabs.com.

Deleting your account and personal data You can delete your personal account details within your profile settings at any time. You can also submit a request to delete the personal data Immersive Labs maintains about you by contacting us at legal@immersivelabs.com. When you delete your account, your profile will no longer be visible to other users and any content you've previously posted will be linked to anonymous user profile. We may also retain certain information about you if you are also a user of the Immersive Labs Platform and your account is still active, or if required by law.

Controlling the use of cookies Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject first- and third-party cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our Community. For more information on controlling how cookies and similar technologies are used on our Community, see our Cookie Policy.

Controlling email notifications You may opt out of receiving some or all categories of email notifications from us by following the instructions in those communications or by updating your email options in your account preferences. If you opt out of email notifications, we may still send you non-promotional communications, such as information about your account or your use of the Community, or to provide you details relating to events you have registered for.

It is usually free for you to exercise your rights and we aim to respond within one month from the date of receipt. 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.

9. ADDITIONAL INFORMATION FOR USERS IN THE EEA OR UK

If you live in the European Economic Area (“**EEA**”) or the United Kingdom (“**UK**”), we are required to identify a legal basis for collecting and using your personal data. There are six legal grounds on 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
- 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

Users in the EEA and the UK also have the following rights (in addition to the “your rights” section above):

Restrict our processing You can ask us to restrict how we process 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).

Object to our processing 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.

Port your personal data You can ask us to send you or another organisation an electronic copy of your personal data.

Complain about our processing

If you are unhappy with the way we collect and use your personal data, you can complain to the privacy regulator in the country in which you live (e.g. the Information Commissioner's Office in the UK), but we hope we can help in the first instance. If you have any concerns, you can email us at legal@immersivelabs.com.

10. ADDITIONAL INFORMATION FOR CALIFORNIA USERS

The California Consumer Privacy Act ("**CCPA**"), as amended, requires us to provide California residents with some additional information, which we address in this section.

If you are a California resident, you have additional rights under the CCPA, including the right to opt out of any sales or sharing of your personal information, as well as the right not to be discriminated against for exercising your privacy rights. Immersive Labs does not "sell" or "share" personal information as those terms are defined under the CCPA.

You may exercise your rights to access, delete, or correct your personal information as described in the "Your Rights and Choices" section of this notice. If you submit a rights request from an authorized agent who does not provide a valid power of attorney, we may ask the authorized agent to provide proof that you gave the agent signed permission to submit the request to exercise rights on your behalf. In the absence of a valid power of attorney, we may also require you to verify your own identity directly with us or confirm to us that you otherwise provided the authorized agent permission to submit the request. If you have any questions or concerns, you may reach us using the methods described under "Your Rights and Choices" or by emailing us at legal@immersivelabs.com.

11. THIRD-PARTY LINKS

Our Community 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 information, so we encourage you to read their privacy notices.

12. CHILDREN

Individuals under the age of 18 are not allowed to create an account or otherwise access our Community.

13. THE IMMERSIVE LABS GROUP

We are Immersive Labs Group 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 6th Floor, The Programme, All Saints' St, Bristol, England, BS1 2LZ)



Immersive Labs Limited (registered in England and Wales under company number 10553244 with its registered office at 6th Floor, The Programme, All Saints' St, Bristol, England, BS1 2LZ)



Immersive Labs Corporation (registered in Delaware, USA with its office at 501 Boylston 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)



Immersive Labs Cyber Security Services LLC (registered in United Arab Emirates with its office at Emirates Towers Office Tower, Trade Center Second, Sheikh Zayed Road, Dubai, United Arab Emirates)

In relation to our Community, Immersive Labs will be the 'controller' (or such similar term provided in applicable privacy laws) of your information. This means we decide what personal data we collect from you and how it is used.

If you are based in the UK, Immersive Labs Limited will be the controller of your information. Immersive Labs Limited is registered with the Information Commissioner's Office, the UK regulator for data protection matters under number ZA281110.

If you are based in the EEA, Immersive Labs GmbH will be the controller of your information.

14. CHANGES TO THIS PRIVACY NOTICE

We may change this privacy notice from time to time. If we do, we will let you know by revising the date at the bottom of the notice. If the changes are material, we may also notify you by sending an email to the address associated with your account or by otherwise providing notice through our Community. We encourage you to review the privacy notice regularly to stay informed about our information practices and the ways you can help protect your privacy. By continuing to use our Community after privacy notice changes go into effect, you are deemed to agree to the revised policy.

15. CONTACT US

If you have any questions about this privacy notice, please contact us at:

Immersive Labs Limited

The Programme
All Saints St
Bristol
England
BS1 2LZ

legal@immersivelabs.com.

For users in the European Economic Area, please contact us at:

Immersive Labs GmbH

c/o RSM GmbH
Georg-Glock-Straße 4
40474 Düsseldorf

legal@immersivelabs.com

For users in the United States, please contact us at:

Immersive Labs Corporation

501 Boylston St
Boston
02116 MA
USA

legal@immersivelabs.com

This privacy notice was updated in June 2024. For previous versions, please email legal@immersivelabs.com.