

Imperial Privacy and Cookie Policy

We are committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us in accordance with applicable data protection laws, including the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Data (Use and Access) Act (DUAA) (where applicable from 19 June 2026). Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Privacy Policy

This Privacy Policy describes management by Imperial Civil Enforcement Solutions Ltd (hereinafter referred to as the “Controller”) of any personal data relating to a natural person (“Data Subject”) who can be identified, directly or indirectly, including by reference to the use of the following website owned by the Controller: <https://www.imperial.co.uk/> (“Controller’s Website”).

Purpose

This Privacy Policy outlines:

- How the Controller collects, uses and protects Personal Data
- The lawful bases relied on for processing
- The rights of Data Subjects under UK GDPR and applicable UK data laws
- Contact details for exercising those rights

Protecting Data Subject privacy and maintaining the integrity of Personal Data means that:

- The Controller will keep Personal Data confidential
- The Controller will not sell, rent or loan a Data Subject’s information to third parties
- The Controller will respect a Data Subject’s privacy when contacting them
- The Controller will control how Personal Data is used and disclosed
- A Data Subject will have access to their Personal Data

Scope

This Privacy Policy applies to the Controller's products, services and website, except where otherwise noted and does not concern third-party websites accessed via external links.

Controllers and Processors of Personal Data

The Controller who determines the purposes and means of Personal Data processing is:

Imperial Civil Enforcement Solutions Ltd

Company No: 02023383

Century House, 1 The Lakes

Northampton NN4 7HD, United Kingdom

Processing may be carried out by the Controller and authorised processors acting on its behalf.

Lawful Basis for Processing

In accordance with UK GDPR and as further supported under the Data (Use and Access) Act (DUAA), the Controller processes Personal Data under one or more of the following lawful bases:

- Contractual necessity
- Legal obligation
- Legitimate interests (including business operations, fraud prevention, and service improvement)
- Consent (where required)

Where applicable, the Controller ensures that legitimate interests are balanced against the rights and freedoms of Data Subjects.

Why the Controller May Collect Personal Data

The Controller may collect Personal Data to:

- Establish identity
- Perform necessary identity and security verifications

- Process transactions and conduct business
- Deliver products and services
- Provide customer support and ongoing service delivery
- Provide Data Subjects with information
- Improve products, services and service delivery
- Better understand needs, interests and preferences
- Recommend relevant services
- Respond to issues, questions, and queries
- Protect against errors or fraud
- Comply with legal and regulatory obligations under UK law

The Controller will collect, use and disclose Personal Data only for purposes that a reasonable person would consider appropriate and proportionate.

Aggregated information that does not identify individuals is not Personal Data and may be used for analysis and service improvement.

The Type of Personal Data the Controller May Collect

The Controller may collect, depending on circumstances:

- Names
- Contact details (email, phone, address)
- Billing and transactional information
- Website usage data (IP address, access times, browser type)
- Preferences and feedback
- Demographic and administrative data

Provision of identification documents is voluntary unless required by law.

How Does the Controller Collect Personal Data?

The Controller may collect Personal Data through:

- The Controller's website
- Use of services

- Communications (email, phone, post, in person)
- Forms and registrations
- Lawfully obtained third-party sources
- Cookies and tracking technologies

Cookies and Tracking Technologies

The Controller uses cookies, web beacons and tracking technologies to:

- Enable website functionality
- Improve user experience
- Analyse website performance

Non-essential cookies are used only with consent, in line with applicable UK data protection and electronic communications regulations.

How the Controller May Disclose Personal Information

The Controller does not sell Personal Data.

The Controller may share Personal Data with:

- Employees, contractors and agents
- Service providers and suppliers
- Affiliates or subsidiaries
- Legal or regulatory authorities where required

Disclosure may occur where necessary to:

- Comply with legal obligations
 - Protect rights, property or safety
 - Prevent or detect fraud or misconduct
 - Support business transactions (e.g. mergers or acquisitions)
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International Data Transfers

Personal Data may be transferred outside the United Kingdom where necessary. Where this occurs, appropriate safeguards will be implemented in accordance with UK GDPR and applicable legislation, including:

- UK adequacy regulations
 - Standard contractual clauses
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Retention and Disposal

The Controller retains Personal Data only for as long as necessary to fulfil its purpose and meet legal obligations, including those arising under UK GDPR and the Data (Use and Access) Act where applicable.

Data is securely deleted or anonymised when no longer required.

Security and Storage

The Controller implements appropriate technical and organisational measures to protect Personal Data, including:

- Secure systems and access controls
- Staff training and awareness
- Data protection by design and by default principles

Despite these measures, no method of transmission over the internet is completely secure.

Data Subjects' Rights

Under UK GDPR and applicable UK legislation (including the Data (Use and Access) Act where relevant), Data Subjects have the right to:

- Access their Personal Data
- Rectify inaccurate data
- Request erasure
- Restrict processing
- Object to processing
- Data portability (where applicable)
- Withdraw consent where applicable

Requests will be responded to within one month unless an extension is legally permitted.

Complaints

Data Subjects have the right to lodge a complaint with the UK supervisory authority:

Information Commissioner's Office (ICO)

<https://www.ico.org.uk>

Contact

For questions or to exercise rights:

Email: dataprotection@imperial.co.uk

Post:

Data Protection Officer
Imperial Civil Enforcement Solutions Ltd
Century House, 1 The Lakes
Northampton NN4 7HD, United Kingdom

Age

The Controller does not knowingly collect Personal Data from individuals under 18. Such data will be deleted if identified.

Updates

This Privacy Policy may be updated from time to time to reflect changes in legal requirements, including those introduced under the Data (Use and Access) Act. Updates will be published on the Controller's Website.

Consent

Where consent is required, it will be obtained clearly and may be withdrawn at any time. If consent is withdrawn, certain services may not be available.

Governing Law

This Privacy Policy is governed by the laws of England and Wales and complies with:

- UK GDPR

- Data Protection Act 2018
- Data (Use and Access) Act (effective 19 June 2026, where applicable)