

INNERMEDIA

25

YEARS · 2001–2026

PRIVACY POLICY

TERMS, CONDITIONS & POLICIES

VERSION 4.0 · MAY 2026

INNER MEDIA LIMITED · COMPANY NO. 04818830

SOPERS HOUSE, SOPERS RD, CUFFLEY, POTTERS BAR EN6 4RY

01707 875 721 · INNERMEDIA.CO.UK

How InnerMedia Collects, Uses and Protects Personal Data

1. ABOUT THIS POLICY

1.1 Inner Media Limited ('InnerMedia', 'we', 'us', 'our') is committed to protecting the privacy and security of personal information. This Privacy Policy explains what personal data we collect, why we collect it, how we use it, and the rights you have in relation to it.

1.2 InnerMedia is registered with the Information Commissioner's Office (ICO) under registration number ICO:00010252104 as both a Data Controller (for data we collect directly) and a Data Processor (for data we process on behalf of our clients).

1.3 This policy applies to: visitors to our website (innermedia.co.uk); prospective and existing clients; personnel of our clients; and End-Users of AI-powered products we deploy on behalf of our clients.

1.4 We handle four categories of data, each described in detail below:

- Website Information — data collected through website visits and cookies;
- Contact and Relationship Information — data provided when you contact us or become a client;
- Client Configuration Information — data provided by clients to configure our services;
- AI Interaction Information — data generated when End-Users interact with our AI products.

2. WHO WE ARE

DETAIL	INFORMATION
Company Name	Inner Media Limited
Company Number	04818830
Registered Address	Enterprise Centre, Cranborne Road, Potters Bar, Hertfordshire EN6 3DQ
ICO Registration	ICO:00010252104
Data Protection Contact	hello@innermedia.co.uk
Telephone	01707 875 721

3. WHAT DATA WE COLLECT AND WHY

3.1 Website Information

When you visit innermedia.co.uk, we may automatically collect:

- Your IP address and approximate geographic location;
- Browser type, version and operating system;
- Pages visited, time on page, referral source and navigation paths;
- Date and time of visits.

We use this data to analyse website performance and improve user experience. The legal basis is our legitimate interests (Article 6(1)(f) UK GDPR). This data is collected via Google Analytics (GA4) and Google Tag Manager. Please see our Cookie Policy (Section 13) for details.

3.2 Contact and Relationship Information

When you contact us, complete a form, request a quote, or enter into a contract with us, we collect:

- Name, job title and organisation;
- Email address and telephone number;
- The content of your communications with us;
- Billing and payment information (processed by Access Paysuite and Xero).

We use this data to manage our client relationships, deliver our services, send relevant communications, and comply with legal obligations. The legal basis is: (a) performance of a contract (Article 6(1)(b)); (b) legitimate interests in managing our business (Article 6(1)(f)); or (c) legal obligation (Article 6(1)(c)).

3.3 Client Configuration Information

Clients provide us with information to configure our services, including:

- School or business information, branding assets, copy and content;
- Documents, FAQs, policies and procedures used to train AI models;
- Staff names and contact details for account management purposes.

We act as a Data Processor for this information. The Client remains the Data Controller. Our processing is governed by the Data Processing Agreement (DPA) executed with each client.

We do not use Client Configuration Information to train, fine-tune or improve any AI model beyond the specific configuration created for that client. This is an absolute commitment.

3.4 AI Interaction Information

When End-Users interact with AI products we have deployed on a client's behalf (e.g. an admissions chatbot or reception assistant), we store:

- The content of conversations between the End-User and the AI;
- Timestamp and session metadata;
- Any information the End-User volunteers during the conversation.

This data is stored securely and made available to the client (the Data Controller) to review. We process this data on behalf of the client under the DPA. Interaction data is automatically deleted after ninety (90) days (or thirty days for interactions identified as involving individuals under 18).

End-Users should be informed by the deploying client that AI is processing their enquiry. If you have questions about how your data has been handled by a specific AI product, please contact the organisation that deployed it.

4. HOW WE SHARE YOUR DATA

4.1 We do not sell personal data to third parties.

4.2 We may share personal data with the following categories of recipients:

- Sub-Processors: third-party service providers who process data on our behalf, as listed in Section 5;
- Professional advisers: lawyers, accountants and insurers, where necessary;
- Regulatory bodies: the ICO or other authorities, where required by law;
- Acquirers: in connection with a sale of InnerMedia's business (clients will be notified in advance).

5. OUR SUB-PROCESSORS

We use the following third-party sub-processors in connection with our services. All are contractually bound to process data only on our instructions and to maintain appropriate security standards:

SUB-PROCESSOR	PURPOSE AND DATA LOCATION
Amazon Web Services (AWS)	Cloud hosting and infrastructure. All data stored in UK or EU regions. AES-256 encryption.

SUB-PROCESSOR	PURPOSE AND DATA LOCATION
Anthropic Claude (via AWS Bedrock)	AI language model powering our AI Products. Accessed via AWS Bedrock — data does not leave the AWS environment and is not used by Anthropic for training.
WordPress / Automattic	CMS platform for client websites.
SendGrid (Twilio)	Email delivery for marketing and transactional communications.
Google LLC (Analytics, Tag Manager, Ads)	Website analytics, tag management and advertising services on client websites.
Meta Platforms Inc.	Advertising pixel services on client websites where enabled.
Access Payscale	Direct debit and payment processing.
Xero	Accounting and invoicing.
Microsoft 365 / OneDrive	Internal document management and communication.

We will notify you of any material changes to our sub-processor list with at least thirty (30) days’ notice.

6. INTERNATIONAL DATA TRANSFERS

6.1 All Client Data and AI Interaction Data is stored and processed within AWS UK or EU regions. We do not transfer this data outside the UK or EEA.

6.2 Some sub-processors (such as Google and Meta) may process limited analytics or advertising data outside the UK/EEA under Standard Contractual Clauses or UK adequacy decisions. Where we rely on SCCs, copies are available on request.

6.3 We do not transfer Personal Data to countries without an adequate level of data protection without a valid legal mechanism in place.

7. DATA RETENTION

DATA TYPE	RETENTION PERIOD
AI Interaction Data	360 days from session (auto-deleted)
AI Interaction Data — children under 18	360 days maximum (auto-deleted)

DATA TYPE	RETENTION PERIOD
Client configuration and content data	Duration of contract + 30 days
Client contact and billing records	7 years (legal requirement)
Website analytics data	26 months (GA4 default)
Marketing enquiry data	3 years from last contact, or until you opt out
Security and access logs	12 months

8. YOUR RIGHTS

Under UK GDPR, you have the following rights in relation to your personal data:

RIGHT	WHAT IT MEANS
Access	Request a copy of the personal data we hold about you.
Rectification	Ask us to correct inaccurate or incomplete data.
Erasure ('right to be forgotten')	Ask us to delete your data where there is no legitimate reason for us to continue processing it.
Restriction	Ask us to restrict processing of your data in certain circumstances.
Data Portability	Receive your data in a structured, machine-readable format where processing is based on consent or contract.
Object	Object to processing based on legitimate interests or for direct marketing purposes.
Withdraw Consent	Where processing is based on consent, withdraw that consent at any time.
Automated Decision-Making	Not be subject to decisions made solely by automated means that significantly affect you.

To exercise any of these rights, contact us at hello@innermedia.co.uk. We will respond within one calendar month. We may request proof of identity before processing your request.

If you are dissatisfied with our response, you have the right to lodge a complaint with the ICO: ico.org.uk / 0303 123 1113.

9. AI-SPECIFIC RIGHTS

9.1 You have the right to be informed that you are interacting with an AI system. Our AI products do not take automated decisions with legal or similarly significant effects without human oversight.

9.2 If you believe an AI product has processed your data incorrectly or made an error that has affected you, please contact the organisation that deployed the AI product in the first instance. If your concern relates to InnerMedia's processing, contact us directly.

9.3 You have the right to request that your AI conversation history be deleted. Requests will be processed within 72 hours.

10. CHILDREN'S DATA

10.1 InnerMedia works with schools and other education providers. Where our services involve the processing of data relating to children under 18, we apply enhanced protections:

- Children's interaction data is retained for a maximum of 90 days;
- Children's data is never used for AI model training or improvement;
- Children's data is not used for advertising or profiling;
- We require clients to ensure appropriate consents and safeguarding measures are in place.

10.2 InnerMedia does not knowingly collect personal data directly from children under 13 through its own website. If you believe we have inadvertently collected such data, please contact us immediately.

11. SECURITY

11.1 We take the security of personal data seriously and implement appropriate technical and organisational measures including:

- AES-256 encryption at rest for all stored data;
- TLS 1.2+ encryption for all data in transit;
- Multi-factor authentication on all internal systems;
- Role-based access controls;
- Annual security review and testing;

- Staff data protection training.

11.2 In the event of a Personal Data Breach, we will notify affected Controllers within 72 hours and, where required, the ICO within 72 hours of becoming aware.

12. THIRD PARTY WEBSITES

Our website may contain links to third-party websites. This Privacy Policy does not apply to those sites. We encourage you to review the privacy policies of any third-party sites you visit.

13. COOKIES

13.1 Cookies We Use

COOKIE TYPE	PURPOSE
Strictly Necessary	Essential for the website to function (session management, security).
Analytics (GA4)	Website performance and visitor behaviour analysis. Requires consent.
Marketing (Meta Pixel, Google Ads)	Advertising effectiveness tracking. Requires consent.
Preferences	Remember your settings and preferences.

13.2 We will ask for your consent before placing non-essential cookies on your device. You can withdraw consent or manage your cookie preferences at any time via our cookie banner or browser settings.

13.3 For more information on cookies, visit ico.org.uk/cookies.

14. UPDATES TO THIS POLICY

We may update this Privacy Policy from time to time to reflect changes in our services, technology or legal obligations. We will notify active clients of any material changes by email with at least thirty (30) days' notice. The current version is always available at innermedia.co.uk/privacy.

Last updated: May 2026 (Version 4.0).