

# ABBOTT MEAD VICKERS BBDO

## PRIVACY NOTICE

This version is effective from: 20/04/2021

This Privacy Notice (“**Privacy Notice**”) sets out how Abbott Mead Vickers.BBDO Limited processes your personal data in connection with our business, including the provision of our website at <https://www.amvbbdo.com/> (“**Site**”) and the services we provide to our clients (“**Services**”).

This Privacy Notice applies to Site visitors and others that we interact with in connection with our Services, including personnel of our clients and suppliers. To find out more please see the “Who we collect personal data about” section.

We will update this Privacy Notice from time to time to reflect any changes or proposed changes to our use of your personal data, or to comply with changes in applicable law or regulatory requirements. We may notify you by email of any significant changes to this Privacy Notice, but we encourage you to review this Privacy Notice periodically to keep up to date on how we use your personal data.

### 1 PURPOSE OF THIS PRIVACY NOTICE

This Privacy Notice explains our approach to any personal data that we might collect from you or which we have obtained about you from a third party, and the purposes for which we process your personal data. This Privacy Notice also sets out your rights in respect of our processing of your personal data.

*When we talk about “personal data”, we mean any information which relates to an identified or identifiable living individual. Individuals might be identified by reference to a name, an identification number, location data, an online identifier (such as an IP address) or to other factors that are specific to them, such as their physical appearance.*

*This Privacy Notice is intended to inform and assist you in respect of your interactions with us. Please take a moment to read and understand it.*

*This Privacy Notice only applies to the use of your personal data obtained by us, whether from you directly or from a third party. It does not apply to personal data collected by third parties during your communications with those third parties or your use of their products or services (for example, where you follow links we provide to third party websites over which we have no control, or you purchase goods or services from those third parties that we refer you to).*

*This Privacy Notice does not apply when we process personal data on behalf and under the instruction of our clients in connection with our Services.*

### 2 ABOUT US

The Site and our Services are made available by ABBOTT MEAD VICKERS.BBDO LIMITED (“**AMV BBDO**”, “**we**”, “**us**”, “**our**”). AMV BBDO is the data controller responsible for your personal data. **AMV BBDO** is an English company (No: 01935786) with its registered office at Bankside 3 90-100 Southwark Street, London, England, SE1 0SW..

### 3 HOW TO CONTACT US

If you have any questions about this Privacy Notice or want to exercise your rights as a data subject set out in this Privacy Notice, you can contact us using the following methods:

<b>On Site</b>	Contact us using the contact form on our Site.
<b>Email</b>	Send us an email at: <a href="mailto:hello@amvbbdo.com">hello@amvbbdo.com</a> .
<b>Telephone</b>	(a) Call us on: (44) 20 3787 0100

#### 4 WHAT PERSONAL DATA WE COLLECT

In providing our Site and our Services, we may collect and process different types of personal data about you for different processing purposes. The types of personal data we collect depends on who you are and how you use our Site and our Services and includes the following (as applicable):

<b>Identity Data</b>	First name; last name.
<b>Contact Data</b>	Delivery address; billing address; email address; telephone number; social media handle.
<b>Financial Data</b>	Bank account details.
<b>Transaction Data</b>	Details about payments made between you and us (or payments that we make to the organisation that we engage you through); details of Services provided by us to our clients.
<b>Communications Data</b>	The content of any emails or other communications that you send to us.
<b>Behavioural Data</b>	Data relating to your behaviours and interests obtained through your browsing activity on our Site which is obtained through the use of cookies, pixel tags and other similar technologies; information about when your current or previous sessions started.
<b>Technical Data</b>	IP address; browser type and operating system; geolocation, to ensure we're showing you the correct notices and information; any other unique numbers assigned to a device.
<b>Marketing Data</b>	Details of any marketing preferences that you have communicated to us.

#### 5 HOW WE COLLECT AND RECEIVE PERSONAL DATA

We collect and receive personal data using different methods:

<b>Personal data you provide to us</b>	You may give us your personal data directly, for example, when you contact us with enquiries, complete forms on our Site, subscribe to receive our marketing communications or provide feedback to us.
<b>Personal data we collect using cookies and other similar technologies</b>	When you access and use our Site, we will collect certain Behavioural Data and Technical Data. We collect this personal data by using cookies and other similar technologies (see the "Insight and analysis through Cookies" section).
<b>Personal data received from third parties</b>	We may receive personal data about you from third parties. Such third parties may include analytics providers, data brokers, third party directories and third parties that provide technical services to us so that we can provide our Site and our Services.
<b>Publicly available personal data</b>	From time to time, we may collect personal data about you (Identity Data, Contact Data or Profile Data) that is contained in publicly available sources (including open source data sets or media reports) or that you or a third party may otherwise make publicly available (for example through speeches at

	events or publishing articles or other news stories or posts on social media platforms).
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## 6 WHO WE COLLECT PERSONAL DATA ABOUT

We collect and process personal data from the following people:

<b>Site visitors</b>	If you browse our Site, we will collect and process your personal data in connection with your interaction with us and our Site.
<b>Social media users</b>	If you like our Facebook page, subscribe to our YouTube channel or follow us on Instagram or Twitter, we will collect and process your personal information in connection with our interactions with you on those social media sites
<b>People who contact us</b>	If you contact us with an enquiry, to provide us with feedback, or to market services to us, including through the contact page on our Site, we will collect and process your personal data in connection with your communication.
<b>People who work for our clients and suppliers</b>	If you work for one of our clients or suppliers (or are engaged as a subcontractor by one of our suppliers) and have responsibility for placing orders with us, administering your organisation's account with us, or handling our orders or our account with your organisation, we will process your personal data in connection with your organisation's relationship with us.
<b>Visitors to our offices</b>	If you attend one of our offices, we may process personal data that you volunteer in connection with your visit and any enquiries you make. For example, you may volunteer personal data when asking us to assist you in finding accommodation or transportation suitable for your needs, or when signing in as a guest. CCTV footage may also be collected for security purposes.
<b>Event attendees</b>	If you attend one of our events, we will process personal data about you in connection with your attendance at the event. For example, we may ask you to complete a registration or feedback form, or other document relating to the event.
<b>Job applicants</b>	If you apply for formal employment or other type of permanent or semi-permanent position with us, whether through the Site or otherwise, we will collect and process your personal data in connection with your application.

## 7 HOW WE USE YOUR PERSONAL DATA

We use your personal data for the purposes set out in this section. If we wish to make any changes to these purposes, or if we wish to use your personal data for any purpose that is not listed in this section, we will notify you using the contact details we hold for you.

### Use of our Site

<b>If you browse our Site</b>	When you browse our Site, we collect and process Behavioural Data and Technical Data to help us understand how you are using and navigating our Site. We do this so that
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	<p>we can better understand which parts of our Site are more or less popular and to improve the contents, structure and navigation of our Site. For more information please see the “Insight and analysis through Cookies” section.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is in our legitimate interest to use personal data in such a way to ensure that we provide access to our Site in a secure and effective way and so that we can make improvements to our Site.</p>
<p><b>If you contact us through our Site</b></p>	<p>We will collect and use personal data about you when you use the contact form on our Site. We may process your Identity Data, Contact Data and any other data that you volunteer in connection with your enquiry.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is in our legitimate interest to use personal data in such a way to ensure that we can respond to your enquiries, provide access to our Site in a secure and effective way and make improvements to our Site.</p>
<p><b>If you link to social media sites and interact with our social media pages</b></p>	<p>If you interact with our social media pages such as on Facebook, Instagram or YouTube (including interacting with any ‘like’ or similar embedded features on our Site or social media accounts), we and the relevant social media platform may receive information relating to such interaction and may share your personal data in connection with this purpose, such as certain Behavioural Data and Technical Data. For more information about how we use this personal data, please see the “Insight and analysis through Cookies” section.</p> <p>The relevant social media platform may also be a controller in respect of the personal data that is collected via your use of our social media pages and may use that personal data for additional purposes. For details of how the relevant social media platform uses your personal data, please see the privacy policy of the relevant social media platform.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is in our legitimate interest to use personal data in the ways described above to ensure that we provide the Site in an effective way and to promote our Site via social media.</p>
<p><b>To resolve technical issues concerning our Site</b></p>	<p>If you have a technical issue concerning our Site, we may collect and process Technical Data and any other information that you provide to us to help us diagnose and resolve the technical issues you are experiencing in an efficient way.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is in our legitimate interest to ensure that our Site is operating effectively.</p>

**Fulfilment of our Services**

<p><b>Fulfilment of our Services</b></p>	<p>Where you are personnel of or otherwise represent one of our clients, we collect and maintain personal data that you provide to us or that we otherwise receive in connection with the Services that we provide. We will use this for the purpose of supplying our Services.</p> <p>The personal data we process may include your Contact Data Financial Data and Transaction Data (where applicable and to the extent that this constitutes your personal data). We process this information so that we can fulfil the supply of Services and for record-keeping purposes.</p> <p>If you attend one of our offices, we will process personal data about you that we receive in connection with your visit or any enquiries that you have. This will usually include your Contact Data, and any other personal data you volunteer.</p> <p>Note, our Services are also subject to separate terms and conditions between us and our clients.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is in our legitimate interest to use personal data in such a way to ensure that we provide the Services and manage your visit to our office in an effective, safe and efficient way.</p>
<p><b>Managing our relationships and communicating with our clients and potential clients</b></p>	<p>When you make an enquiry (whether via email, telephone or otherwise) or we communicate with you in relation to our Services and/or our client relationship, we will collect and process your Identity Data, Contact Data, Transaction Data and Communications Data (as applicable). We use this information to respond to your enquiry and to manage the relationships that we have with our clients.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is in our legitimate interest to use your personal data in the ways described above to ensure that we are able to help you with your enquiry, provide a good standard of service and improve our client relationships.</p>

**Surveys and feedback**

<p><b>If you complete our surveys or provide feedback on your experience of our Services</b></p>	<p>From time to time, we will invite you to provide feedback about us and/or our Services in the form of surveys. We will collect and process your Identity Data, Contact Data and, if applicable, certain Transaction Data, as well as any other personal data you choose to volunteer in your survey response or other feedback.</p> <p>We use this information to help us to monitor and improve our Services and to train our personnel.</p>
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	<p>You can also get in touch with us to voluntarily provide feedback. Please see the “How to Contact Us” section for details of how to contact us.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is in our legitimate interest to use the personal data provided by you so that we can improve our Services and provide them in an effective way.</p>
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**Hosting and managing events.**

<p><b>If you sign up for and/or attend one of our events</b></p>	<p>From time to time, we may organise and host events for the purpose of promoting our business or for charitable causes or other reasons. We may process your Identity Data and Contact Data to communicate with you about such events where you have specifically requested information about such events or where we have another lawful basis for sending that information to you.</p> <p>If you attend one of our events, we may use your Identity Data and Contact Data to record your attendance at the event and for related record-keeping purposes and, if relevant, we may collect and process any dietary requirements you may have. You may also feature in photographs taken at our events and such photographs may appear in publications that we make available.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is necessary for us to use your personal data in this way to perform our obligations in accordance with any contract that we may have with you where you have signed up to attend an event, or it is in our legitimate interest or a third party’s legitimate interest to use personal data in such a way to ensure that the event is operated in an effective way.</p> <p>We may specifically ask your permission to use your photographs, quotes, testimonials, or other content that you make available or publish at the event. Where this is the case, our processing of your such personal data will be based on consent.</p>
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**Insight and analysis through Cookies**

<p><b>We use cookies to help us understand more about you and your use of our Site</b></p>	<p>We and our third-party partners use cookies, web beacons, pixel tags and other similar technologies (which we generically refer to as “<b>Cookies</b>”) to collect data from the devices that you use to access our Site. The data that is collected includes Behavioural Data and Technical Data. Please see our <a href="#">Cookie Policy</a> for further information, including details of our third-party partners.</p> <p>We and our third-party partners use this data to analyse how you use our Site and the effectiveness of our Site, including:</p>
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	<ul style="list-style-type: none"><li>• to analyse how you use, and the effectiveness of, our Site;</li><li>• to count users who have visited our Site and collect other types of information, including insights about visitor browsing habits, which helps us to improve our Site and Services.</li><li>• to measure the effectiveness of our content;</li><li>• to learn what parts of our Site are most popular and what kind of features and functionalities our visitors like to see;</li><li>• to help us understand the type of content that is most likely to appeal to our visitors and clients; and</li><li>• to help us improve our Services and design our website;</li><li>• to remember your preferences.</li></ul> <p><b><i>Our legal basis for processing</i></b></p> <p>Where your data is collected through the use of non-essential cookies, we rely on consent to collect your personal data and for the onward processing purpose.</p>
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**Marketing to our clients and prospective clients**

<p><b>If we send our clients or prospective clients marketing communications by email</b></p>	<p>We use your Identity Data, Contact Data and Marketing Data (if any) to send you (or the organisation you represent) marketing communications by email. Our marketing will include press releases and information about us, our Site, our Services, any events we may hold and the offers and promotions we offer from time to time.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is in our legitimate interest to use your personal data for marketing purposes, for example to decide what marketing content we think may appeal to you.</p> <p>It is in our legitimate interest to use your personal data to send our marketing to you by email, except where we are required by applicable law to obtain your consent in which case we will only send marketing communications to you by email where you have consented to receive such communications.</p>
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**Recruitment**

<p><b>If we use your personal data in connection with our recruitment activities</b></p>	<p>We use your personal data for recruitment purposes, in particular, to assess your suitability for any of our positions that you apply for, whether such application has been received by us online, by email or by hard copy and whether submitted directly by you or by a third-party recruitment agency on your behalf. We also use your Identity Data and Contact Data to communicate with you about the recruitment process, to keep records about our recruitment process and</p>
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	<p>to comply with our legal and regulatory obligations in relation to recruitment.</p> <p>We will process any personal data about you that you volunteer, including during any interview, when you apply for a position with us. We may also process your personal data obtained from any third parties we work with in relation to our recruitment activities, including without limitation, recruitment agencies, background check providers, and your referees.</p> <p>The personal data we process may include your Identity Data, Contact Data, details of your education, qualifications and employment history, any other personal data which appears in your curriculum vitae or application, any personal data that you volunteer during an interview or in your interactions with us, or any personal data which is contained in any reference about you that we receive. Such information may also include special categories of personal data (such as information about your health, any medical conditions and your health and sickness records) and information relating to criminal convictions and offences if that information is relevant to the role you are applying for.</p> <p>We also use your personal data for the purposes of reviewing our equal opportunity profile in accordance with applicable legislation. We do not discriminate on the grounds of gender, race, ethnic origin, age, religion, sexual orientation, disability or any other basis covered by local legislation. All employment-related decisions are made entirely on merit.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>Where we use your personal data in connection with recruitment, it will be in connection with us taking steps at your request to enter into a contract we may have with you or it is in our legitimate interest to use personal data in such a way to ensure that we can make the best recruitment decisions.</p> <p>We will not process any special (or sensitive) categories of personal data or personal data relating to criminal convictions or offences except where we are able to do so under applicable legislation or with your explicit consent.</p>
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**Receipt of products and services from our suppliers.**

<p><b>If we have engaged you or the organisation you represent to provide us with products or services</b></p>	<p>If we have engaged you or the organisation you represent to provide us with products or services (for example, if you or the organisation you represent provide us with services such as IT support or financial advice), we will collect and process your personal data in order to manage our relationship with you or the organisation you represent, to receive products and services from you or the organisation you represent and, where relevant, to provide our Services to others. The personal data we collect from you may include your Identity Data and Contact Data and any other personal data you</p>
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	<p>volunteer which is relevant to our relationship with you or the organisation you represent.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you or the organisation you represent, or it is in our legitimate interest to use personal data in such a way to ensure that we have an effective working relationship with you or the organisation you represent and are able to receive the products and services that you or your organisation provides, and provide our Services to others, in an effective way.</p>
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## Security

<p><b>If we need to use your personal data in connection with the administration of our security measures</b></p>	<p>We have security measures in place at our premises, including CCTV and building access controls. There are signs in place showing that CCTV is in operation. The images captured are securely stored and only accessed on a need to know basis (e.g. to look into an incident). CCTV recordings are typically automatically overwritten after a short period of time unless an issue is identified that requires investigation (such as a theft).</p> <p>We may require visitors to our premises to sign in on arrival and, where that is the case, we will keep a record of visitors for a short period of time. Our visitor records are securely stored and only accessible on a need-to-know basis (e.g. to look into an incident).</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is in our legitimate interests to process your personal data so that we can keep our premises secure and provide a safe environment for our personnel and visitors to our premises.</p>
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## Business administration and legal compliance

<p><b>If we need to use your personal data to comply with our legal obligations or in connection with the administration of our business</b></p>	<p>We may use your personal data: (i) to comply with our legal obligations; (ii) to enforce our legal rights or defend potential legal claims; (iii) to protect the rights of third parties; and (iv) in connection with a business transition such as a merger, reorganisation, acquisition by another company, or sale of any of our assets.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>Where we use your personal data in connection with a business transition, to enforce our legal rights or to protect the rights of third parties, it is in our legitimate interest to do so. For all other purposes described in this section, we have a legal obligation to use your personal data to comply with any legal obligations imposed upon us, such as a court order.</p>
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	We will not process any special (or sensitive) categories of personal data or personal data relating to criminal convictions or offences except where we are able to do so under applicable legislation or with your explicit consent.
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**8 IF YOU FAIL TO PROVIDE YOUR PERSONAL DATA**

Where we need to collect your personal data, or we need to collect your personal data in connection with any contract we have with you or your organisation, and you fail to provide that personal data when we request it, we may not be able to perform any contract that we have or are trying to enter into or you or your organisation may be prevented from working with us.

**9 HOW WE OBTAIN YOUR CONSENT**

Where our use of your personal data requires consent, you can provide such consent at the time we collect your personal data following the instructions provided, or by informing us using the contact details set out in the “How to Contact Us” section above.

**10 THIRD-PARTY LINKS**

This Privacy Notice only applies to personal data processed by us through your use of our Site and/or in connection with our business operations. However, from time to time, our Site may contain links to third-party websites and services. We have no control over these websites and services and this Privacy Notice does not apply to your interaction with the relevant third parties.

When you use a link to go from our Site to another website (even if you don’t leave our Site) or you request a service from a third party, your browsing and interactions on any other websites, or your dealings with any other third-party service provider, is subject to that website’s or third-party service provider’s own rules and policies. For example, our Site invites you to connect with us on social media platforms such as Facebook and Instagram. When you click on the links we provide to such third-party platforms, you will be transferred from our Site to the relevant third-party platform and the privacy notice (and other terms and conditions) of that platform will apply to you.

We do not monitor, control or endorse the privacy practices of any third parties. We encourage you to become familiar with the privacy practices of every website you visit or third-party service provider that you use in connection with your interaction with us and to contact them if you have any questions about their respective privacy notices and practices.

**11 SHARING PERSONAL DATA**

We only share personal data with others when we are legally permitted to do so. When we share personal data with others, we put contractual arrangements and security mechanisms in place to protect the personal data shared and to comply with our data protection, confidentiality and security standards and obligations.

*When processing your personal data, we may need to share it with third parties (including other entities within our group of companies), as set out in the table below. This list is non-exhaustive and there may be circumstances where we need to share personal data with other third parties.*

<b>Third-party suppliers who provide applications/ functionality, data processing or IT services</b>	<i>We share personal data with third parties who support us in providing our Site and help provide, run and manage our internal IT systems. Such third parties may also include, for example, providers of information technology, cloud-based software-as-a-service providers, identity management, website design, hosting and management, data analysis, data back-up, security and storage services. The servers powering and facilitating that cloud infrastructure are located</i>
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	<i>in secure data centres around the world, and personal data may be stored in any one of them. We also share your personal data with third-party service providers to assist us with insight analytics.</i>
<b>Payment providers and banks</b>	<i>We share personal data with third parties who assist us with the processing of payments and refunds.</i>
<b>Delivery and courier companies</b>	<i>We share personal data with suppliers who assist us in the delivery of physical items.</i>
<b>Third-party marketing and CRM specialists</b>	<i>We share personal data with specialist suppliers who assist us in managing our marketing database and sending out our post and email marketing communications and account-related communications.</i>
<b>Third-party suppliers who assist us in administering our promotions</b>	<i>We share personal data with specialist suppliers who assist us in administering our prize draws, prize competitions and other promotions.</i>
<b>Event partners and suppliers</b>	<i>When we run events, we will share your personal data with third-party service providers that are assisting us with the operation and administration of that event. If we are running an event in partnership with other organisations, we will share your personal data with such organisations for use in relation to the event.</i>
<b>Hotel and transport operators and other travel-related businesses</b>	<i>When you submit an enquiry to us about a hotel or transport provider, we will share your enquiry (including any personal data you volunteer) with that third party so that they can provide the information and assistance that you have requested.</i>
<b>Recruitment agencies and related organisations</b>	<i>We share personal data with external recruiters, third-party providers that undertake background checks on our behalf and other entities within our group of companies.</i>
<b>Auditors, lawyers, accountants and other professional advisers</b>	<i>We share personal data with professional services firms who advise and assist us in relation to the lawful and effective management of our organisation and in relation to any disputes we may become involved in.</i>
<b>Law enforcement or other government and regulatory agencies and bodies</b>	<i>We share personal data with law enforcement or other government and regulatory agencies or other third parties as required by, and in accordance with, applicable law or regulation.</i>
<b>Other third parties</b>	<i>Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, or to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.</i>

## 12 TRANSFERS OUTSIDE THE UK AND THE EUROPEAN ECONOMIC AREA (“EEA”)

Where necessary in order to provide our Site and our Services, we will transfer personal data to countries outside the UK and the EEA.

Non-EEA countries do not have the same data protection laws as the UK and the EEA. In particular, non-EEA countries may not provide the same degree of protection for your personal data, may not give you the same rights in relation to your personal data and may not have a data protection supervisory authority to help you if you have any concerns about the processing of your personal data. However, when transferring your personal data outside the UK or the EEA, we will comply with our legal and regulatory obligations in relation to your personal data, including having a lawful basis for transferring personal data and putting appropriate safeguards in place to ensure an adequate level of protection for the personal data. We will take reasonable steps to ensure the security of your personal data in accordance with applicable data protection laws.

*When transferring your personal data outside the UK or the EEA, we will, where required by applicable law, implement at least one of the safeguards set out below. Please contact us if you would like further information on the specific mechanisms used by us when transferring your personal data outside the UK or the EEA.*

<b>Adequacy decisions</b>	We may transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK and/or European Union. For further details, see <a href="https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en">https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en</a> .
<b>Model clauses</b>	Where we use certain service providers, we may use specific contracts approved by the UK and/or European Union which give personal data the same protection it has in the UK and/or the EEA. For further details, see <a href="https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en">https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en</a> .

### **13 HOW LONG WE KEEP YOUR PERSONAL DATA**

We generally keep personal data for as long as we need it for the purposes described in this Privacy Notice.

In respect of personal data that we process in connection with the supply of our Services, we may retain your personal data for up to seven years from the date of supply of the relevant Services and in compliance with our data protection obligations. We may then destroy such files without further notice or liability.

Where we process any other personal data, we will retain relevant personal data for up to three years from the date of our last interaction with you (and in compliance with our data protection obligations). We may then destroy such files without further notice or liability.

If any personal data is only useful for a short period (e.g. for a specific activity, promotion or event), we will not retain it for longer than the period for which it is used by us.

If you have opted out of receiving marketing communications from us, we will need to retain certain personal data on a suppression list indefinitely so that we know not to send you further marketing communications in the future. However, we will not use this personal data to send you further marketing unless you subsequently opt back in to receive such marketing.

### **14 CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL DATA**

We are committed to keeping the personal data you provide to us secure and we have implemented information security policies, rules and technical measures to protect the personal data under our control from unauthorised access, improper use or disclosure, unauthorised

modification and unlawful destruction or accidental loss. In addition, all our employees and data processors (i.e. those who process your personal data on our behalf) are obliged to respect the confidentiality of personal data.

**15 PERSONAL DATA OF MINORS**

Our Site is not intended for use by, or targeted at, minors (individuals under the age of 18) and we do not knowingly collect personal data of minors. However, this does not prevent minors from providing personal data to us. If we do collect personal data of minors, we will comply with all applicable laws and regulations relating to the processing of personal data of minors.

**16 YOUR RIGHTS AS A DATA SUBJECT**

You have certain rights in relation to the personal data we hold about you. These rights include the right: (i) to obtain copies of your personal data; (ii) to have your personal data corrected or deleted; (iii) to limit the way in which your personal data is used; (iv) to object to our use of your personal data; (v) to transfer your personal data; (vi) not to be subject to decisions based on automated processing (including profiling); and (vii) to complain to a supervisory authority. If you would like to exercise any of these rights, please contact us using the details set out in the "How to Contact Us" section above.

<b>Your right of access</b>	If you ask us, we will confirm whether we are processing your personal data and, if so, provide you with a copy of that personal data (along with certain other details). If you require additional copies, we may charge a reasonable fee for producing those additional copies.
<b>Your right to rectification</b>	If the personal data we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If we have shared your personal data with others, we'll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you who we've shared your personal data with so that you can contact them.
<b>Your right to erasure</b>	You can ask us to delete or remove your personal data in some circumstances, such as where we no longer need it or where you withdraw your consent (where applicable). If we have shared your personal data with others, we will let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we will also tell you who we have shared your personal data with so that you can contact them directly.
<b>Your right to restrict processing</b>	You can ask us to "block" or suppress the processing of your personal data in certain circumstances such as where you contest the accuracy of that personal data or you object to us processing it for a particular purpose. This may not mean that we will stop storing your personal data but, where we do keep it, we will tell you if we remove any restriction that we have placed on your personal data to stop us processing it further. If we've shared your personal data with others, we'll let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal data with so that you can contact them directly.

<b>Your right to data portability</b>	You have the right, in certain circumstances, to obtain personal data you have provided to us (in a structured, commonly used and machine-readable format) and to reuse it elsewhere or to ask us to transfer it to your chosen third party.
<b>Your right to object</b>	You can ask us to stop processing your personal data, and we will do so, if we are: (i) relying on our own or someone else's legitimate interest to process your personal data, except if we can demonstrate compelling legal grounds for the processing; or (ii) processing your personal data for direct marketing purposes.
<b>Your rights in relation to automated decision-making and profiling</b>	You have the right not to be subject to a decision when it is based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for the entering into, or the performance of, a contract between you and us.
<b>Your right to withdraw consent</b>	If we rely on your consent (or explicit consent) as our legal basis for processing your personal data, you have the right to withdraw that consent at any time. You can exercise your right of withdrawal by contacting us using our contact details in the "How to Contact Us" section above or by using any other opt-out mechanism we may provide, such as an unsubscribe link in an email.
<b>Your right to lodge a complaint with the supervisory authority</b>	<p>If you have a concern about any aspect of our privacy practices, including the way we have handled your personal data, please contact us using the contact details provided in the "How to Contact Us" section above. You can also report any issues or concerns to a national supervisory authority in the Member State of your residence or the place of the alleged infringement. You can find a list of contact details for all EU supervisory authorities at <a href="http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm">http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm</a>.</p> <p>As we are incorporated in the United Kingdom, our regulatory authority is the Information Commissioner's Office ("ICO"). Contact details for the ICO can be found on its website at <a href="https://ico.org.uk">https://ico.org.uk</a>.</p>