



B2B PR | MARKETING | DIGITAL

4CM Privacy Policy

May 2018





PRIVACY Policy

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. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the GDPR (General Data Protection Regulation) and PECR (Privacy and Electronic Communication Regulation) the data processor is 4CM Ltd, Challenge House, Sherwood Drive, Bletchley, Milton Keynes, MK3 6DP.

We hold our EU clients' and suppliers' data and the data of personnel within companies that have expressed interest or have opted in to be contacted. We collect our data through business contact in sales, downloads, subscriptions, inquiries or events that have provided consent or legitimate interest.

As Your Data Processor

As a marketing agency, 4CM will use customer data that is supplied for campaigns and projects as specifically instructed by clients (the controller). If you are another marketing company, sub-contracting a data processing task to 4CM you become our data controller to which the above obligations apply.

If you have questions or would like to speak to our **Data Protection Officer**, please contact Gemma Brooks at gemma.brooks@4cm.co.uk



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WHY we collect personal data

We use information held about you in the following ways:

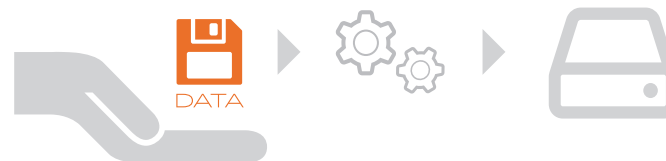
- To ensure that content from our site is presented in the most effective manner for you and for your internet browser
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes
- To carry out our obligations arising from any contracts or transactions entered into between you and us
- To allow you to participate in interactive features of our service, when you choose to do so
- To notify you about changes to our services
- If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data.

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WHAT personal data is collected and processed

The data that you provide to us with your consent for a specified purpose, including:

- Personal contact information, including information allowing 4CM Ltd to contact you in person
- Demographic information, including date of birth, age, gender, location, favourite products, hobbies, interests, and household or lifestyle information
- Payment information, including to make purchases
- Customer feedback, including information that you share with 4CM Ltd about your experience in using 4CM Ltd's services
- Customer-generated content, including any content that you create and then share with 4CM Ltd by uploading it to a 4CM Ltd website.



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HOW personal data is collected

Personal data is that which you provide to us, for example by filling in forms on our website or by corresponding with us by telephone, email, post, social media or otherwise.

We may collect personal data about you from the following sources:

- Online and electronic interactions, including via 4CM Ltd websites
- Offline interactions with us, including via hard copy registration cards, competition entries, event registrations or phone contact
- Your interaction with online targeted content (such as advertisements) that 4CM Ltd, provide to you via third party websites or applications
- Cookies and other tracking technology which collect certain kinds of information when you interact with 4CM Ltd sites. Please see our cookie notice for information on these technologies and your rights in relation to them
- **External links** - Although we look to include quality, safe and relevant external links, users are advised adopt a policy of caution before clicking any external web links mentioned throughout this website. (External links include clickable text / banner / image links to other websites)

We cannot guarantee or verify the contents of any externally linked website despite our best efforts. Users should therefore note that they click on external links at their own risk and that this website and its owners cannot be held liable for any damages or implications caused by visiting any external links mentioned.



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IP addresses and cookies

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and optimisation. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. They enable us:

- To estimate our audience size and usage pattern
- To store information about your preferences, and so allow us to customise our site according to your individual interests
- To speed up your searches
- To recognise you when you return to our site
- You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.



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Generally, the cookies that are used on our sites can be broken down into the following categories:

Session Cookies

These cookies are used 'in-session' each time you visit and then expire when you leave a site or shortly thereafter: they are not stored on your device permanently, do not contain any personal data and help by minimising the need to transfer personal data across the internet. These cookies can be deleted, or you can refuse to allow their use, but this will hamper the performance and your experience in using the sites. These cookies also take time stamps that record when you access a site and when you leave a site.

Tracking Cookies

These cookies enable us to recognise repeat visitors to our sites. By matching an anonymous, randomly generated identifier, a tracking cookie keeps track of where a user of our sites came from, which search engine they may have used, which link they clicked on, which keyword they used and where they were in the world when they accessed a site. By monitoring this data, we can make improvements to our sites.

Persistent Cookies

This type of cookie is saved on your device for a fixed period (sometimes for a few hours, sometimes for a year or longer) and is not deleted when the browser is closed. Persistent cookies are used where we need to remember who you are for more than one browsing session. For example, this type of cookie can be used to store your preferences, so that they are remembered for the next visit to a site.

Performance or Analytical Cookies

Performance cookies are used to analyse how the sites are used and to monitor their performance, which allows us to improve your experience in using the sites. These cookies help us to tailor the content of the sites to reflect what the site users find most interesting and to identify when technical issues with the sites arise. We may also use this data to compile reports to help us analyse how sites are used, what the most common issues are and how we can improve the sites.

Opt-out for cookies used for online advertising - Just in case

You can also manage many companies' cookies used for online advertising via the consumer choice tools created under self-regulation programs in many countries, such as the EU-based <http://www.youronlinechoices.com/uk/your-ad-choices>.

You can withdraw your consent to the use of consent based cookies individually at any time with effect for the future by adjusting your cookie settings accordingly.



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Email Newsletter

We operate an email newsletter program, used to inform subscribers about our work, and services. Users can subscribe through an online automated process should they wish to do so at their own discretion. Some subscriptions may be manually processed through prior written agreement with the user.

Subscriptions are taken in compliance with GDPR and PECR. All personal details relating to subscriptions are held securely and in accordance to GDPR/PECR. No personal details are passed on to third parties nor shared with companies / people outside 4CM Ltd. You may request a copy of personal information held about you by 4CM Ltd's email newsletter program.

Our email marketing campaigns may contain tracking facilities within the actual email. Subscriber activity is tracked and stored in a database for future analysis and evaluation. Such tracked activity may include: the opening of emails, forwarding of emails, the clicking of links within the email content, times, dates and frequency of activity (this is not a comprehensive list).

This information is used to refine future email campaigns and supply users with more relevant content based around their activity.

In compliance with GDPR and PECR subscribers are given the opportunity to un-subscribe at any time through an automated system. This process is detailed at the footer of each email campaign. If an automated un-subscription system is unavailable clear instructions on how to un-subscribe will be detailed instead.

Social Media Platforms

Communication, engagement and actions taken through external social media platforms that we participate on are customised to the terms and conditions as well as the privacy policies held with each social media platform respectively.

Users are advised to use social media platforms wisely and communicate / engage upon them with due care and caution in regard to their own privacy and personal details. We will never ask for personal or sensitive information through social media platforms and encourage users wishing to discuss sensitive details to contact us through primary communication channels such as by telephone or email.

We use social sharing buttons which help share web content directly from web pages to the social media platform in question. Users are advised before using such social sharing buttons that they do so at their own discretion and note that the social media platform may track and save your request to share a web page respectively through your social media platform account.



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HOW long will we keep your personal information

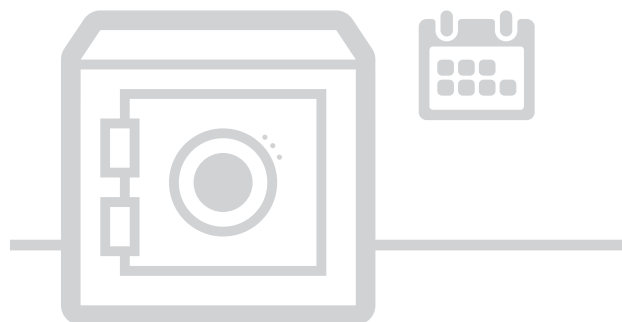
4CM Ltd will only retain information for as long as necessary for the relevant activity. This may be determined by legislation or a decision as to what we consider necessary for the business based on a number of factors.

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WHERE we store your personal data

4CM Ltd has put in place appropriate technical and organisational measures to prevent accidental loss, damage or destruction of your personal data, and to protect your personal data against unauthorised, or unlawful use or theft. We put in place strict confidentiality agreements, including data protection obligations, with our third-party service providers and data processors.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we use strict procedures and security features to try to prevent unauthorised access.



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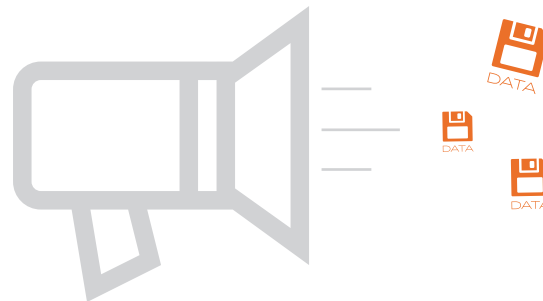
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WHERE your information is disclosed

We may disclose information about you to (any of our employees, officers, agents, suppliers or subcontractors) insofar as reasonably necessary for the purposes as set out in this privacy policy.

In addition, we may disclose your personal information:

- a. to the extent that we are required to do so by law
- b. in connection with any legal proceedings or prospective legal proceedings
- c. in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk)
- d. to the purchaser (or prospective purchaser) of any business or asset which we are (or are contemplating) selling
- e. we may disclose your personal information to third parties:
 - In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets
 - If 4CM Ltd or substantially all of its assets are acquired by a third party, in which case personal data held by it about its clients will be one of the transferred assets.



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WHAT are your rights

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at info@4cm.co.uk or calling us on +44 (0)1908 533253.

You may choose to restrict the collection or use of your personal information in the following ways:

- Whenever you are asked to fill in a form on our website, choose the box to confirm you understand our privacy policy, and do not select the box to receive additional information if that is what you wish
- If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us.

Our site may, from time to time, contain links to and from the websites of our partner networks and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

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ACCESS to information

GDPR gives you the right to access information held about you. Your right of access can be exercised in accordance with the policy. Any access request may be subject to a fee of £25 to meet our costs in providing you with details of the information we hold about you.

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the below address. We will promptly correct any information found to be incorrect.



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WHAT if our policy changes

Any changes we may make to our privacy policy in the future will be updated on our website and this document, where appropriate, notified to you by e-mail.



CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to gemma.brooks@4cm.co.uk or by calling us on **+44 (0)1908 533253**.

Address:

4CM Ltd
Challenge House
Sherwood Drive
Bletchley
Milton Keynes
MK3 6DP