



PRIVACY POLICY

Last updated 23 February 2021

This privacy notice explains how we, Pubity Group Limited of 20 Dale Street, Manchester, M1 1EZ and our affiliated companies and other brands (collectively, "Pubity Group", "we", "us", "our") process your personal data ("you", "your") when you use our website, content or other services.

Individuals in the European Economic Area (EEA), Switzerland and the UK should also read our section about "Your EEA, Swiss & UK Rights".

1. Who does this privacy notice apply to?

This notice applies to:

- our **service users** who access our services such as our website or content anywhere on the web, such as, users who watch our content, submit content to us, participate in our surveys and focus group and other users;
- our **clients, suppliers and business partners**; and
- **other persons** who interact with us, when you call us or email us.

This notice applies to you whether you act in your personal capacity or as employee or agent of an organisation.

2. What types of information do we collect?

Generally, "**personal information**", "**personal data**" or similar terms refer to any information that identifies you or relates to you. However, the exact meaning of personal information may be determined by the law of the country of your residence.

We will process the following personal data about you:

- Your **contact details** such as your email address when you sign up to our newsletter as a user or your name, role, employer details, telephone number, email address and similar information when you interact with us in your business capacity.
- When you contact or visit us, we may process your enquiry, communication, complaint and other **details of your enquiry**.
- If you are a prospective client, we will keep your personal and professional details and other **opportunity records** for sales purposes.
- If you engage with our focus groups or surveys,

we will collect your input and other **participation information**.

- When we send you emails or other communications or if you interact with our content all over the Internet we may collect **engagement information** such as open rates, click rates, view rates, active time spent and similar information.
- When accessing our services, your **device and browser** will automatically provide unique information such as mobile device ID, internet protocol (IP) address, cookie ID or online identifiers, operating system, browser type, time zone setting, location and date and time of access.
- Our website may record **website usage data** about how you navigate and engage with our services, use our features, download materials, security logs will be kept, online activity data such as clickstream data with URLs visited previously, page interaction information (such as scrolling, clicks, and mouse-overs), your preferences (including country and language), and methods used to browse away from our website. We may collect data through our partners LiveRamp, Ipsos iris and Google subject to your cookie consent settings.
- When you access our website or content, we collect information about your **preferences and interests** known, observed or inferred which we use for personalisation and direct marketing.
- **Third party data about you** such as information about your interaction with our posts and content and 'likes' on social media platforms, such as Facebook, Twitter, Snap, TikTok, or LinkedIn, profile information, preferences and interests received from our advertising and analytics partners and other third parties.

Much of the personal data is provided by you or automatically by your device. You can adjust your device privacy settings to limit disclosure of your personal data that is not necessary for our services. We would ask that you only provide the necessary personal data to us.

Some of the information will be necessary to assist you, to provide our services or to pursue our legitimate interests in data processing. In certain limited cases, some personal data may be mandatory for our compliance with the law.

3. Data accuracy

We will rely on the information provided by you as accurate, complete and up to date, so please keep us informed of any changes. For example, if you change your email address, please let us know so that we can continue sending you our newsletter.

4. What information do we collect and why?

Generally, we will use your personal data to (i) provide and enable you to use our website, content and other services; (ii) respond to your queries; (iii) develop and promote our organisation and services; (iv) ensure the security and technical availability of our services; and (v) comply with the law.

Purpose	Personal data	Legal ground for processing (for individuals in the EEA, Switzerland and UK only)
To assist and contact you in relation to your enquiry .	<ul style="list-style-type: none"> contact details details of your enquiry 	Necessary for our legitimate interest in responding to queries, developing relationships and administering our business or to take necessary steps at your request prior to entering into a contract with you.
To provide our services to you, such as our website, content and other services.	<ul style="list-style-type: none"> device & browser data engagement information website usage data 	Necessary for our legitimate interest in providing our website and content to you or, as the case may be, necessary for the performance of our contract with you.
To manage our business relationship with you using communications, management and engagement tools.	<ul style="list-style-type: none"> contact details opportunity records preferences and interests engagement information 	Necessary for our legitimate interest in understanding and maintaining our business relationships and administering our business.
To send you information which you have requested about our services and service communications about matters relevant to your use of our services and your engagement with us, such as changes in our terms, events, etc.	<ul style="list-style-type: none"> contact details preferences and interests engagement information 	Service communications are necessary for the performance of our contract with you. Other notifications are necessary for our legitimate interest in satisfying your requests, facilitating our services and organising related business activities.
To engage with you about surveys and focus groups .	<ul style="list-style-type: none"> contact details participation information engagement information 	Necessary for our legitimate interest in developing our business and organising related business activities.
To send you our newsletter and promotional information through email about our services and organisation, reviewing and optimising campaign performance and profiling information about your interests known, observed or inferred for direct marketing purposes .	<ul style="list-style-type: none"> contact details engagement information preferences and interests third party data 	We may rely on soft opt-in to send marketing to our existing clients or will obtain your consent as required by law, for example, if you sign up for our newsletter. Some of our direct marketing activities are necessary for our legitimate interest in understanding your interests from the information available to us, information observed or inferred and third party information, in promoting our business and understanding campaign metrics.

Purpose	Personal data	Legal ground for processing (for individuals in the EEA, Switzerland and UK only)
<p>To display advertisements relevant to you on websites and social media, reviewing and optimising campaign performance and profiling information about your interests known, observed or inferred for direct marketing purposes.</p> <p>For example, we use your contact details to display relevant ads through Twitter or LinkedIn or other social media platforms. Social media and advertising providers may use their own information about you to help us make our ads more relevant.</p> <p>Our partner LiveRamp will collect your device & browser data and use digital fingerprinting techniques to recognise your device for online and cross-channel advertising purposes. It may be shared with our advertising partners and other third party advertising companies globally for the purpose of enabling interest-based content or targeted advertising throughout your online experience (e.g. web, email, connected devices, and in-app, etc). These third parties may in turn use this code to link demographic or interest-based information you have provided in your interactions with them. If you wish to opt out from LiveRamp's processing, please go to https://liveramp.com/opt_out/</p>	<ul style="list-style-type: none"> • contact details • engagement information • preferences and interests • third party data 	<p>We will obtain your consent where required by law. For example, your consent will be required to place cookies or similar technologies on your device or to read information on your device.</p> <p>Some of our direct marketing activities are necessary for our legitimate interest in understanding your interests from the information available to us, information observed or inferred and third party information, in promoting our business and understanding campaign metrics.</p>
<p>To improve and develop our services, including to:</p> <ul style="list-style-type: none"> • obtain feedback; • use Google Analytics and Ipsos iris to understand the demographics of our users and for audience measurement; • conduct statistical analysis; • make services and features more relevant; • improve user experience; • work with third parties and evaluate data to improve and develop our services. <p>Our partner the UK Online Measurement company has retained Ipsos MORI and DotMetrics to deploy tags and digital fingerprint techniques on our website to collect information about our users' online behaviour and about our</p>	<ul style="list-style-type: none"> • Aggregated data based on your participation information, engagement information, device & browser data, website usage data and preferences and interests. 	<p>Necessary for our legitimate interest in delivering our services properly, efficiently and understanding our customer's needs and expectations.</p> <p>We will use cookies and similar technologies if you provided your consent.</p>

Purpose	Personal data	Legal ground for processing (for individuals in the EEA, Switzerland and UK only)
users' computer, hardware and software. For more information please contact Ipsos MORI at compliance@ipsosiris.com or DotMetrics at dpo@dotmetrics.net or refer to the Ipsos iris site-centric privacy policy at: https://iris.ipsos.com/site-centric-privacy/		
<p>To ensure proper administration of our business, including to:</p> <ul style="list-style-type: none"> • keep appropriate records about how our services are used; • resolve complaints; • conduct troubleshooting; • manage our business relationships and identify opportunities; • register interactions with our communications, such as emails; • enforce our terms; and • debt collection. 	<ul style="list-style-type: none"> • all information as is necessary and proportionate for the administration of our business 	Necessary for our legitimate interest in the proper administration of our business, dispute resolution, ensuring technical operation of our services and debt collection and necessary for compliance with a legal obligation to which we are subject.
To engage our third party service providers who may process your information on our behalf to facilitate the provision of our services and the fulfilment of essential service functions, such as web hosting, cloud storage, analytics, payments, plugins, communications, accounting, security and others.	<ul style="list-style-type: none"> • all information as is necessary and proportionate to enable the relevant service 	Some activities are necessary for the performance of our contract with you, others are necessary for our legitimate interest in ensuring the proper operation of our services.
To monitor our networks, website and systems for suspicious activities, test and audit our systems and deploy appropriate security measures .	<ul style="list-style-type: none"> • website usage data • device & browser data 	Necessary for our legitimate interest to ensure the security of our organisation, people and services and necessary for compliance with a legal obligation to which we are subject.
To monitor interactions and operations for fraud prevention and crime detection purposes, including information from third parties who may help us verify your identity or alert us about suspicious activities.	<ul style="list-style-type: none"> • contact details • browser & device data • website usage data • third party data 	Necessary for our legitimate interest in detecting and preventing fraud and illegal conduct and necessary for compliance with a legal obligation to which we are subject.
To process health information provided by you, inform you of government guidance and, where appropriate, inform third parties about the risk of infection or share information with relevant authorities.	<ul style="list-style-type: none"> • health information provided by you 	Where necessary and proportionate, in order to satisfy our legitimate interest in complying with best practice or applicable laws, and where necessary for compliance with a legal obligation to which we are subject, or to establish, exercise or defend legal claims or to fulfil our duty of care owed to third parties.
To share information with our affiliated companies .	<ul style="list-style-type: none"> • all information as is necessary and proportionate 	Necessary for our legitimate interest in using our group's resources to organise, develop and deliver our services, run our organisation and decide on future strategies.
To share data with another organisation in accordance with the law for the purposes of a joint venture, collaboration, financing, sale, merger, reorganisation or similar event relating to our business.	<ul style="list-style-type: none"> • all information as is necessary and proportionate in connection with the event 	Necessary for our legitimate interest in acting in the best interest of our shareholders and investors and complying with our legal obligations .
<p>To process information as is required for our compliance with the law or to establish, exercise or defend legal claims.</p> <p>To process and share information with other third parties where required by law, such as regulators, law enforcement agencies or where mandatory under a court order.</p>	<ul style="list-style-type: none"> • Any information subject to mandatory processing or disclosure, where this is necessary and proportionate 	Where processing or sharing your data is necessary for compliance with a legal obligation to which we are subject, to establish, exercise or defend legal claims , or, where necessary and proportionate, in order to satisfy our legitimate interest in complying with best practice or applicable laws.

We will update you about any new purposes of processing of your personal data from time to time, and we will obtain your prior consent for such new purposes where we are required to do so at law.

5. Cookies and similar technologies

What are cookies and similar technologies? These are technologies that enable us to store information, or access information stored, on your device such as your computer or smartphone.

- **Cookies** are small text files sent to or accessed by your web browser which will enable you to navigate our online services and features but also enable us to measure and improve engagement with our audiences. They are used to recognise returning users by sitting on your device and making themselves known when you access our systems.
- **Pixels** or **tags** are tiny graphics files that are downloaded when you interact with our services. This will then alert us that you have opened an email, clicked on content or other action. These are typically used to capture interaction information and measure the relevance of our content.
- **Tracking URLs** are custom generated links that help us understand where web traffic comes from.
- **Local storage** is used to more efficiently manage the temporary storage of information that allows you to access our services on your device.
- **Digital fingerprint** is used to recognise your device based on your device & browser data without relying on cookies. For this purpose, our partners **LiveRamp** and **Ipsos Iris** may collect your IP address, monitor settings, type of browser and operating system to create a unique serial number which constitutes a digital “fingerprint”.

Why do we use cookies and similar technologies?

Like most organisations with online presence, we use the following cookies and similar technologies to:

- provide our services which is not possible without certain **essential cookies**;
- remember your settings and **preferences** to improve your experience, speed up your searches and recognise you when you return to our service;
- understand our online traffic through **analytics** tools;
- personalise our **marketing** and **advertising**; and
- connect you with our **social media** features.

To accomplish this, we will, in certain cases, also link information from cookies and similar technologies with personal data held about you.

Whose cookies and similar technologies are deployed in connection with my device?

We will deploy cookies and similar technologies ourselves. However, our services may also include cookies and similar technologies deployed by third parties.

For example, third party cookies will enable providers to find out how you used our services and combine that information with other third party information. Advertising cookies deployed by third-party service providers remember your browsing activity and group together your interests which they know, observe or infer to send you personalised ads. Such personalisation is only possible because of profiling carried out with information collected through cookies and similar technologies. This may include your preferences, characteristics, behaviour and attitudes. We manage our ads through a variety of digital marketing networks and advertisement exchanges and use a range of advertising technologies.

Acceptance

When you use our services, essential cookies and similar technologies which are required to provide our services will be automatically set on your device.

Others will also be set if you accept cookies and similar technologies by selecting your choices in the cookie banner. As already mentioned, some cookies are provided by third parties and your acceptance of cookies will extend to such third parties.

This means, for example, that if you chose to accept “Analytics” cookies we will feel encouraged to use Google Analytics and it will constitute consent for Google to deploy its cookies which collect statistical information about how users interact with our services.

How long are cookies used?

The lifespan of each cookie may differ. We use both session and persistent cookies. Session cookies only last until you close your browser. Persistent cookies aren’t automatically deleted when you close your browser and they recognise returning users.

Refusing cookies

You do not have to accept cookies (apart from the essential ones), but without accepting them the functionality of our services will be reduced. We participate in the IAB Europe Transparency & Consent Framework (“**TCF**”) and operate a Consent Management Platform which helps us to comply with the cookies consent requirements. You can change your cookie preferences at any time by clicking “Change privacy settings” and mark your new choices.

While we try to ensure that your choices are fully respected, this may not always be possible, particularly where third parties are involved. For example, if you do not agree to “Social Media” cookies but you still interact with our Instagram plugins in our services, Facebook may set certain essential and non-essential cookies outside our control. As discussed below, you should read Facebook’s privacy notice for more detail.

For this reason, aside from relying on our cookie settings, please also consider:

- turning off the automatic download feature in your browser, as described at allaboutcookies.org;
- opting out from online interest-based advertising from companies that participate in opt-out programs through the [Digital Advertising Alliance](#), the [Interactive Digital Advertising Alliance](#), [Appchoices](#) or [Network Advertising Initiative](#). We do not participate but some of our advertising partners may do; and
- opting out from third party services that deploy cookies and similar technologies, such as Google Analytics, by visiting www.google.com/settings/ads or by downloading the opt-out add-on at <https://tools.google.com/dlpage/gaoptout>.

What happens if I disable cookies?

By disabling cookies, you may experience a reduced service. For example, opting out of the placement of advertising cookies does not necessarily mean that you will not see advertisements – it means you won't see personalised advertising.

Note that if you delete or clear cookies on your device, the next time you visit our website our cookie consent banner will reappear, and you will need to select your preferences again. Remember that if you change your settings to exclude cookies in your browser or device but later request services by interacting with our service features (e.g. you click on a social media plug-in on our website), this may override your browser or device settings.

6. Sharing your information

We will share your information where it is lawful, necessary and proportionate to do so with (i) **our third party service providers** who may process personal data on our behalf, (ii) our **marketing** and **analytics** partners deploying cookies and similar technologies in our services and other partners, as explained above, (iii) our **affiliated companies** for the purposes set out above, (iv) persons or authorities where we are **compelled by law** or responsible practices, (v) to the relevant entity in case of a **merger, acquisition or collaboration**, and (vi) other third parties where you have provided your **consent**.

7. Third parties may process your information

Our services may contain links to other websites, third party services, such as Twitter and Instagram and plugins. You should check the privacy statements of these third party providers before you use them as we are not responsible for how they may process your personal data.

8. How long is your information kept?

We will keep your personal information for as long as is necessary for the purposes listed above or longer,

as may be required by law. Generally, we will keep your personal information for 6 years from collection. However, in practice the retention period will likely be shorter if the information is no longer needed or longer if required for lawful purposes.

After the retention period, your personal data will either be securely deleted or anonymised and it may be used for analytical purposes. You must back up your data if you wish to keep it for longer.

9. How do we secure your information?

We maintain appropriate organisational and technological safeguards to help protect against unauthorised use, access to or accidental loss, alteration or destruction of the personal data we hold. We also seek to ensure our third-party service providers do the same.

We will endeavour to use the least amount of personal data as is required for each purpose. We will employ pseudonymisation and anonymisation techniques, where appropriate.

Our staff will access your personal data on a “need to know” basis.

10. Where is your information processed?

We may transfer your personal data to our affiliated companies, suppliers and other third parties in countries different to your country of residence. Generally, your information is held in the United Kingdom and the EEA.

We will comply with applicable rules about international transfer of personal data.

11. Opt-out

If you would like us to stop sending you marketing communications and to process your personal data for direct marketing purposes, please let us know.

You can request to stop receiving our marketing communications at any time by clicking on the unsubscribe link at the bottom of each marketing message.

12. Contact us

Please contact us at contactus@pubitygroup.com or at our registered office address above if you have any queries or concerns about how we use your personal data. We will try to resolve your query without undue delay.

13. Updates

If we make any changes to our notice you will be able to see them on this page. You should regularly check for updates, as indicated by the “Last updated” date at the top.

If you do not agree with the changes, please do not continue to use our website or services. Of course, if any such changes significantly affect you, we will ask for your prior consent where we are required to do so by law.

14. Your EEA, UK and Swiss Rights

This section provides further disclosures and describes the rights in relation to your personal data that you may have under the General Data Protection Regulation (“GDPR”) or other relevant law if you are an individual in the EEA, Switzerland or the UK.

A. Personal data

“Personal data” means any information relating to an identified or identifiable natural person; such person is known as a ‘data subject’. In practice, almost all information relating to you will be your personal data.

B. How do we process your information and why?

We will process your personal data as “controller” for the purposes and on the legal grounds for processing set out above.

C. Data subject rights

Subject to certain exemptions, limitations and appropriate proof of identity, as a data subject, you will generally have numerous rights in relation to your personal data that you may exercise with the controller, including the following:

- **Right to information** about matters set out in this notice. You may also contact us for further details about our retention policy and international data transfers.
- **Right to make an access request** to receive copies of personal data.
- **Right to rectification** of any inaccurate or incomplete personal data.
- **Right to withdraw consent** previously provided.
- **Right to object** to our processing of personal data based on our legitimate interests, and any automated processing and profiling.
- **Right to erasure** of personal data, within limited circumstances.
- **Restriction** on the processing of personal data.
- **Right to data portability** from one service provider to another, where applicable.
- **Right to lodge a complaint** with your country’s supervisory authority, such as the Information Commissioner’s Office in the UK.

All requests will be processed in a timely manner, generally within one month. If we cannot process your request within this period, we shall explain why and process it as soon as possible thereafter.

