PRIVACY POLICY

S A Secure Limited is committed to protecting and respecting your privacy. In this privacy policy, we explain how we use any personal information we collect about you when you use this website and our wider services:

Topics:

- Terms used in this policy
- What information do we collect about you and how?
- Cookies
- Other websites
- How will we use the information about you and why?
- Marketing
- Access to your information, correction and deletion-your rights
- How long will we hold your data for
- Transferring your information outside of the EEA
- Complaints
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Terms used in this policy:

Personal Data means any information relating to an identified or identifiable natural person, including, but not limited to, a first and last name, a home or other physical address and an email address or other contact information. It may also include financial and credit card information, personal description and photograph.

Sensitive Personal Data means any personal data but includes the racial or ethnic origin of the individual, their political opinions, their religious or philosophical beliefs, their membership of a trade union, their physical or mental health or condition, their sexual life, the commission or alleged commission by them of any offence, any proceedings for any offence committed or alleged to have been committed by them, the disposal of such

proceedings or the sentence of any court in such proceedings, genetic data; and biometric data where processed to uniquely identify a person (for example a photo in an electronic passport).

Data Controller means the person or organisation who determines the purposes for which and the manner, in which any personal data is processed. The Data Controller is S A Secure Ltd.

Our **Data Protection Officer** is Paul Montgomery who can be contacted at email privacy@pcf.co.uk

Data Processor means a person or organisation which processes personal data for the Data Controller.

Data Processing is any activity that involves the use of Personal Data.

What information do we collect about you and how?

We collect information about you when you register with us on our website, make a telephone enquiry, make an enquiry over live chat, connect with us on social networks, sign up for an event or webinar, enquire about receiving insights, attend our stand at an event or you participate in a competition etc. In addition, we may collect data you have registered on social networking sites (e.g. LinkedIn) or registered data collection companies (e.g. ALF Insights). We may collect the following information from you:

- Name, company/organisation details and job title.
- Contact information including your work email address and phone number.
 Our website prevents personal/free email addresses being entered onto forms (except for job applications).
- Demographic data such as preferences and interests.
- Other information from surveys/competitions you have responded to. Our legal bases for handling this data are therefore to enable us to perform a contract with you and in addition, processing the data is necessary for the purposes of our legitimate interests in ensuring you receive information about the digital marketing services or products you have asked to receive from us.

In some cases, we may need to collect from you Sensitive Personal Data, such as information concerning medical conditions, disabilities and special requirements. We need this, in order to be able to handle any particular needs you may have in relation to a meeting (please refer to our Fair Processing

Policy on our website for prospective employee's data). Sensitive Personal Data is handled with your express consent and such data will only ever be processed strictly with the intention of our providing to you the digital marketing services you have asked us to provide to you.

We may also keep information contained in any correspondence you may have with us by telephone, post, email or other communication.

Website usage information is collected using cookies.

Cookies

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is then used to track visitor use of the website and to create statistical reports on website activity. For further information visit www.aboutcookies.org.

You can set your browser not to accept cookies but this may cause problems with the functionality of the on-line booking system as a result.

Please refer to our Cookie Policy located on our website.

Other Websites

Our website contains links to other websites. However, this privacy policy only applies to this website so when you link to other websites you should read their own privacy policy.

HOW WILL WE USE THE INFORMATION ABOUT YOU AND WHY?

We will only use your personal information to:

- Improve our products and services
- Send promotional information about new digital marketing products & services
- Contact you about other digital marketing information such as data insights, webinar invitations, newsletters, blogs, eBooks, event information, feedback etc. which we believe you may be legitimately interested in
- Customise our website around your interests
- Send you information on products and services you ask us to provide.

We do not sell on your personal data.

When you become a client of S A Secure Ltd, to deliver on our strategy it may require us to pass your information to companies within our group, third-party service providers, agents, subcontractors and other associated organisations solely for the purposes of completing tasks and providing our services to you. In those instances where we do need to pass on your details to a third party, we will only provide the personal information necessary to deliver our services. We require those third parties to keep secure your Personal Data so that they may not use it for their own direct marketing purposes.

In the course of providing our digital marketing services to you as a client, we may be required to forward your Personal Data to:

- Insurance companies or regulatory authorities so as to comply with any legal and regulatory issues and disclosures;
- Any third party contractors and advisors that provide a service to us or act as our agents on the understanding they keep the information confidential;
- Any third party partners that provide a service to us on the understanding they keep the information confidential;
- Any legal or crime prevention agencies and/or to satisfy any regulatory request if we have a duty to do so or if the law allows us to do so;
- Specific third party websites so as to complete information relating to customers' retainer or project arrangements.

We will only use this information subject to your instructions, data protection law and our duty of confidentiality. We will not share your information for marketing purposes with companies outside of our group.

Marketing

We would like to send you information about our services and products which may be of interest to you. If you have consented to receive marketing, you may opt out at a later date.

You have a right at any time to stop us from contacting you for marketing purposes or giving your information to other members of our group.

If you no longer wish to be contacted for marketing purposes, please email privacy@pcf.co.uk or click the unsubscribe at the bottom of our marketing email communications.

Access to your information, correction and deletion- your rights

The GDPR grants you the right to access particular Personal Data that we hold about you. You therefore have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please email or write to us at the following address: S A Secure Ltd, Oak House, Langstone Business Park, Newport, NP18 2LH.

We shall respond promptly to any such request and in any event, within one month from the point of receiving the request and all necessary information from you. In certain circumstances, we may make a small charge for this service. Our formal response will include details of the Personal Data we hold about you, including the following:

- Sources from which we acquired the information;
- The purposes for Processing; and
- The persons or entities with whom we are sharing the information. You also have the right to receive your Personal Data in a structured, commonly used and machine-readable format and have the right to ask us to transmit it to another controller if technically possible.

We want to make sure that your Personal Data is accurate and up to date. You may ask us to correct or remove without delay any information about you that you think is inaccurate by emailing us at privacy@pcf.co.uk or writing to us at the above address.

You have the right to seek a restriction of the processing of your Personal Data in certain circumstances. Further, you have the right to lodge an objection if you feel that one of the grounds relating to your particular situation apply. When you exercise your right to object, we must stop any processing unless we can show compelling legitimate grounds for the Processing, which override your interest, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

Should you wish for us to completely delete all information that we hold about you, you should please contact the Data Protection Officer who can be contacted at privacy@pcf.co.uk

How long will we hold your data for?

Our retention period of 2 years is in line with the length of time needed to fulfil our services to you taking into account our need to meet any legal, statutory and regulatory obligations with which we are bound to comply.

You will have the opportunity to opt out or update or delete Personal Data at any point should you need to do so and details are set out in this policy as to how to achieve this.

Our need to use your personal information will be reassessed on a regular basis and we will dispose of Personal Data which we no longer require.

TRANSFERRING YOUR INFORMATION OUTSIDE OF EUROPE

As part of the services offered to you through this website, the information which you give to us may be transferred to countries outside the European Economic Area. For example, some or our third-party providers may be located outside of the EEA. Where this is the case we will take steps to make sure the party receiving the data agrees to provide the same or similar protection that we do and that the information they receive is used only in accordance with our instructions. By submitting your Personal Data, you are agreeing to this transfer, storing or processing. Where our third-party suppliers are in the US we have ensured that their services fall under the "Privacy Shield" whereby participating companies are deemed to have adequate protection and therefore facilitate the transfer of information from the EEA to the US.]

If you use our services while you are outside the EEA, your information may be transferred outside the EU to give you with those services.

Complaints

If you feel that your personal data has been processed in a way that does not comply with the GDPR, you have a specific right to lodge a complaint with the relevant supervisory authority. The supervisory authority will then inform you

of the progress and outcome of your complaint. The supervisory authority in the UK is the Information Commissioner's Office.

Changes to our privacy policy

We keep our privacy policy under regular review and we will place any updates on this web page. This privacy policy was last updated on 24 May 2018.

How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you:

- By email privacy@pcf.co.uk
- Or write to us at: S A Secure Ltd, Oak House, Langstone Business Park, Newport, NP18 2LH