

Insurgo Media Services Limited

Privacy and Cookie Policy

Insurgo Media Services Limited respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

Purpose of this privacy notice

This privacy notice aims to give you information on how Insurgo collects and processes personal data if you are a customer, supplier, interested third party or through use of our website.

It is important that you read this privacy notice to ensure you are aware of how and why we use your data.

Insurgo is the controller and responsible for your personal data (referred to as “Insurgo”, “we”, “us” or “our” in this privacy notice). If you have any questions about this privacy notice, including any requests to exercise your legal rights, please email compliance@insurgomedia.com.

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO and would request that you contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

We keep our privacy notice under regular review. The date at the bottom of the document will be amended each time the notice is updated.

It is important that the personal data we hold about you is accurate and current. Should your personal data change during your relationship with us, then please keep us informed of these changes.

The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes physical address, email address and telephone numbers.
- **Financial Data** includes bank account details, credit reference checks, shareholding information.

- **Transaction Data** includes details about payments to and from you and other details of products and services you have supplied to us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.

We do not knowingly collect personal data from anyone under the age of 18 or collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see the cookie section, at the end of this notice, for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources including:
 - Identity, Contact and Financial Data from our registrars and brokers.
 - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.
 - Identity and Financial Data where we carry out identity verification, credit or anti-fraud checks against your name using third party databases.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you.

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Purposes for which we will use your personal data

We may use your personal data for the following purposes:

- To register you and your company as a customer or supplier;
- To process and deliver orders including payments;
- To manage our relationships with our shareholders including sending company circulars, reports and other required documentation;
- To tell you about important changes to the website and our Company.
- To administer and protect our business.

Legal basis for using your personal data

The legal basis upon which we rely in order to use the personal data which we collect about you for the purposes set out in this notice include:

- **Contract:** Using your personal data will be necessary for us to either perform the contract between us or in order to take steps at your request prior to entering into the contract.
- **Legal compliance:** Using your personal data will be necessary for us to comply with a legal or regulatory obligation which is placed on us.
- **Legitimate interest:** Using your information will be necessary for our legitimate commercial interest and our interest is not outweighed by the potential impact on your privacy.
- **Consent:** It is possible that you may give us your consent to use your information for a particular purpose.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

We may share your personal data with the parties set out below:

- Other entities in our group as part of our regular reporting activities on company performance;

- Service providers who provide HR, IT and system administration services.
- Professional advisers including registrars, brokers, lawyers, bankers, auditors and insurers.
- Regulators and other similar authorities who require reporting of processing activities in certain circumstances.
- Registered credit reference or fraud prevention agencies in order to carry out identity verification, credit or anti-fraud checks against your name.
- Third parties in the context of a business reorganisation or group restructuring exercise

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International transfers

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, amongst other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy statement.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and

any applicable regulator of a breach where we are legally required to do so.

Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Your legal rights

Under certain circumstances, you have rights in relation to your personal data which enable you to:

- Request access to your personal data.
- Request correction of the personal data that we hold about you.
- Request erasure of your personal data.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.
- Request restriction of processing of your personal data.
- Request the transfer of your personal data to you or to a third party.
- Withdraw consent at any time where we are relying on consent to process your personal data.

If you wish to exercise any of the rights set out above, please contact us at compliance@insurgomedia.com. Please note, that we may not always be able to comply with your request for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Cookies

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree.

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By browsing the site, you are agreeing to our use of cookies

We use the following cookies:

Session cookies – these are temporary cookie files, which are erased when you close your browser. They ensure a smooth operation of the website.

Persistent cookies – these files stay in one of your browser's subfolders until you delete them manually or your browser deletes them based on the duration period contained within the persistent cookie's file.

The persistent cookies we use are "analytical" cookies. They allow us to recognise and count the number of visitors and to see how visitors move around the site when they are using it including what pages you visit on our website, what links you click on and how long you spend on various pages/links. This helps us to improve the way our website works.

You can find more information about the individual cookies we use and the purposes for which we use them by contacting us at compliance@insurgomedia.com.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. Information about the procedure to follow in order to enable or disable cookies can be found on your Internet browser provider's website via your help screen. You can also find further information here: <http://www.allaboutcookies.org/> and <https://tools.google.com/dlpage/gaoptout>.

If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

We will review this policy on an annual basis and any changes made to it will be published on our website. This privacy policy was last updated on 9th January 2019.