

# Privacy and Cookies Policy

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To exercise your rights under the Data Protection Regulations, you may contact ProAction Network's Data Protection Officer on all issues related to processing your data. If you have a complaint, it is your right to contact the Information Commissioner's Office (ICO), the UK supervisory body for data protection.

## 1 Introduction

This policy applies to ProAction Networks and all ProAction Networks subsidiaries. When we refer to "we", "our" or "us" we are referring to ProAction Networks Limited of 43 Highbury Lane, Campbell Park, Milton Keynes, Buckinghamshire, MK9 4AQ (Company No. 6536817) and its subsidiaries, or any of them as the context so requires.

### 1.1 Privacy & Cookies Policy

We take data protection seriously and safeguarding the privacy of our website visitors is important to us. This policy (Privacy & Cookies Policy) sets out the basis on which any personal information we may collect from you, or you provide to us, will be processed and used by us. It also describes how we use cookies and how you can manage them.

Any links from our website to other websites are provided merely for your convenience and do not imply our endorsement of the content or the provider. If you follow a link to any of these websites, you do so at your own risk and we do not accept any responsibility or liability for the content of such websites.

## 2 Information we may collect from you

We can only use your personal data if we have a proper reason for doing so. According to the law, we can only use your data for one or more of these reasons:

- To fulfil a contract we have with you, or
- If we have a legal duty to use your data for a particular reason, or
- When you consent to it, or
- When it is in our legitimate interests.

Legitimate interests are our business or commercial reasons for using your data, but even so, we will not unfairly put our legitimate interests above what is best for you.

By using our website or by registering for any of the products and services we offer through it, you are confirming to us that you understand and accept that your personal information may be used by us in the manner described below.

We may collect and process the following data about you:

- Information that you provide by filling in forms on our website. This includes information provided at the time of registering to use our website, subscribing to our products and services, posting material or requesting further products and services. We may also ask you for information when you report a problem with our website.
- If you contact us, we may keep a record of that correspondence (including email and phone conversations).

- Your name, address, telephone numbers, email address and other information which you supply to us.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Details of transactions you carry out through our website and the fulfilment of those transactions.
- Details of your visits to our website including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.

Certain kinds of personal data, such as data about your racial or ethnic origin, your physical or mental health, your religious beliefs, political opinions, health and genetic data or alleged commission or conviction of criminal offences, are *special categories* of personal data which by law require additional protection.

We do not collect any special categories of personal data about you.

### 3 Uses made of the information

We may use information held about you in the following ways:

- To ensure that content from our website is presented in the most effective manner for you and for your computer.
- To provide you with information, products or services that you request from us or which we feel may be of interest to you, where you have consented to be contacted for such purposes.
- To audit the usage of our website.
- To carry out our obligations arising from any contract entered into between you and us.
- For training purposes, quality assurance or to record details about the products and services you order from us.
- To satisfy and meet our legal and regulatory requirements.
- To allow you to participate in interactive features of our services, when you choose to do so.
- To notify you about changes to our products and services.

Unless prescribed by law, we will retain your personal information for no longer than is necessary for the purposes for which the personal information was collected or for which it is to be further processed by us.

We have set out below how we may use your personal data and the legal bases we may rely on to do so:

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and manage payments, fees and charges or collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

## 4 Disclosure of your information

We may disclose your personal information to third parties if we are under a duty to disclose or share your personal information in order to comply with any legal or regulatory obligation, or in order to enforce or apply our terms and conditions and other agreements; or to protect the rights, property, or safety of our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

In order to provide you with requested products and services we may need to transfer your personal information to service partners based in countries outside the European Economic Area (EEA). This does not diminish your rights. We will take all reasonable steps necessary to ensure that any personal information transferred outside the EEA by us will be treated securely and in accordance with this Privacy & Cookies Policy.

## 5 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. 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.

## 6 Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

## 7 Transfers of data outside of the EEA

In order to provide you with requested products and services we may need to transfer your personal information to service partners based in countries outside the European Economic Area (EEA). This does not diminish your rights. We will take all reasonable steps necessary to ensure that any personal information transferred outside the EEA by us will be treated securely and in accordance with this Privacy & Cookies Policy.

## 8 IP addresses and cookies

First-party cookies are cookies that belong to the same domain that is shown in the browser's address bar (or that belong to the sub domain of the domain in the address bar).

Third-party cookies are cookies that belong to domains different from the one shown in the address bar. Web pages can feature content from third-party domains (such as banner ads), which opens up the potential for tracking the user's browsing history. Privacy setting options in most modern browsers allow the blocking of third-party tracking cookies.

To refuse to accept cookies please follow the below instructions:



In Chrome, you can adjust your cookie settings by clicking "Settings", "Show advanced settings" and "Content Settings".



In Internet Explorer, you can refuse all cookies by clicking "Tools", "Internet Options", "Privacy", and selecting "Block all cookies" using the sliding selector.



In Safari, you can adjust your cookie settings by clicking "Safari", "Preferences" and "Privacy".



In Firefox, you can adjust your cookie settings by clicking "Tools", "Options" and "Privacy".

Blocking cookies may have a negative impact on your interactivity with some websites.

For more information about cookies please visit <http://www.allaboutcookies.org/>

## 9 Your rights and how to contact us

You are entitled to see copies of all personal data held by us and to amend, correct or delete such data. You can also limit, restrict or object to the processing of your personal data. If you gave us consent to use your data e.g. so that we can send you marketing emails, you can withdraw your consent.

Under the data protection legislation additional rights will be granted to data subjects. For example, the right to rectification means that if we hold inaccurate data, the data subject can request that it is corrected within a period of no longer than thirty days. Often, how we deal with data subject rights will be through our business as usual processes. Other rights include the right to data to be erased, the right to access data (often referred

to as a Subject Access Request), right to object and to restrict processing. There are also rights in respect of data portability and automated decision making, including profiling.

You have the right to:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **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. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

## 10 Contact Information

If you have comments or any questions about our Privacy & Cookies Policy please contact: [regulatory@pxnnet.com](mailto:regulatory@pxnnet.com)

We regularly review our policies and any changes will be posted on our website. This Privacy & Cookies Policy was last reviewed and updated in May 2018.

The ProAction Networks data protection officer is Melissa Peach and she can be contacted at ProAction Networks, 43 Highbury Lane, Campbell Park, Milton Keynes, Buckinghamshire, MK9 4AQ, at [regulatory@pxnnet.com](mailto:regulatory@pxnnet.com) or via 0800 091 0046.