

## **PRIVACY POLICY**

### **How we will use information about you**

#### **1. GENERAL**

*Approach PR Ltd* together with any group companies (“**we**” “**us**” “**our**”) are committed to protecting and respecting your privacy. For the purposes of data protection legislation, we are the data controller and we will process your personal data in accordance with the General Data Protection Regulation (EU) 2016/679 and national laws which relate to the processing of personal data. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

#### **2. VISITORS TO OUR WEBSITE**

2.1 We may collect and process personal data about you in the following circumstances:

- 2.1.1 when you complete forms on our website (“**Site**”). This includes *your email address* which is provided at the time of registering to use our Site, where you ask us to contact you about our goods or services, subscribe to our mailing list, or subscribe/request or goods or services;
- 2.1.2 whenever you provide information to us when reporting a problem with our Site, making a complaint, making an enquiry or contacting us for any other reason. If you contact us, we may keep a record of that correspondence;
- 2.1.3 details of your visits to our Site 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 (see section 2.2.2 on Cookies below);
- 2.1.4 whenever you disclose your information to us, or we collect information from you in any other way, through our Site.

2.2 We may also collect data in the following ways:

##### IP Address

- 2.2.1 We may collect information about your device, including where available your Internet Protocol address, for reasons of fraud protection. We may also collect information about your device’s operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users’ browsing actions and patterns, and does not identify any individual.

##### Cookies

- 2.2.2 Our Site uses cookies to distinguish you from other users of our Site. This helps us to provide you with a good experience when you browse our Site and also allows us to improve our Site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy <https://www.approachpr.com/cookies-policy/>

2.3 We may use your personal data for our legitimate interests in order to:

- 2.3.1 provide you with information, or services that you requested from us;
- 2.3.2 allow you to participate in interactive features of our Site, when you choose to do so;
- 2.3.3 ensure that content from our Site is presented in the most effective manner for you and for your device;

- 2.3.4 improve our Site and services;
- 2.3.5 process and deal with any complaints or enquiries made by you; and
- 2.3.6 contact you for marketing purposes where you have signed up for these (see section 6 for further details).

#### Website Links

Our Site may, from time to time, contain links to and from the websites of third parties. Please note that if you follow a link to any of these websites, such websites will apply different terms to the collection and privacy of your personal data and we do not accept any responsibility or liability for these policies. When you leave our Site, we encourage you to read the privacy notice/policy of every website you visit.

### **3. CUSTOMERS**

- 3.1 We will collect details such as *name, company name, job role, telephone number, contact email address, work postal address and VAT registration number* when you order goods or services from us either via our Site, *email correspondence and phone calls*. We will use this information to process your order and comply with our contractual obligations.
- 3.2 [In order to perform our contact with you, we may also need to share personal data with third parties such as payment providers and postal service organisations to assist in the delivery of goods or services you have ordered]; This includes the use of couriers for pick up or delivering goods, social media advertising / management platforms to manage accounts as required, website and IT agencies for assistance in website management, advertising agencies / media houses / digital platforms for the management of advertising activity as required, charities and sponsorship contacts for the management of activity as required, photographers for the management of client activity as required, competition winners for agreement of competition prizes as appropriate, journalists and media for comment and conversation as required, membership organisations and awards organisations regarding activity / administration / information as advised or required.
- 3.3 We may also advertise your feedback on our website and marketing materials (subject to obtaining your prior consent where necessary);
- 3.4 We will retain your information as long as we require this to provide you with the goods or services ordered from us and for a period of six years afterwards. Where you have subscribed to receive marketing correspondence from us we will keep your personal data for the period of time described in section 6 below.

### **4. SUPPLIERS**

We will collect details such as *name, company name, job role, telephone number, contact email address, work postal address and VAT registration number* in order to contact you about goods or services ordered with you, to place further orders and to pay you for the goods and/or services supplied. We will keep the personal data for six years afterwards.

### **5. 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 the data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example to provide you with our goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **6. MARKETING**

- 6.1 In addition to the uses described in sections 2-4 above, *where you indicate you would like to receive marketing correspondence from us, subscribe to our mailing lists or newsletters, enter into any of our competitions or provide us with your details at networking events* we may use your personal data for our legitimate interests in order to provide you with details about our *goods, services, business updates and events* which we think may be of interest.

- 6.2 You have the right to opt-out of receiving the information detailed in section 6.1 at any time. To opt-out of receiving such information you can:
- 6.2.1 tick the relevant box situated in the form on which we collect your information;
  - 6.2.2 clicking the unsubscribe button contained in any such communication received; or
  - 6.2.3 email us at *Suzanne@approachpr.com* or call *01943 603805* providing us with your name and contact details.
- 6.3 Where you have subscribed to receive marketing correspondence from us we will keep personal data three years from when you are provided with the opportunity to opt-out of receiving marketing correspondence from us.

## **7. MONITORING AND RECORDING**

We may monitor and record emails communications with you for the purpose of *quality assurance*.

## **8. AUTOMATED PROCESSING**

- 8.1 We may carry out a credit check on our customers, clients and suppliers:
- 8.1.1 so that we can make credit decisions about you; and
  - 8.1.2 to prevent fraud and money laundering.
- 8.2 Our search may be recorded on the files of the credit referee agency.
- 8.3 If further to undertaking a credit check you receive a low credit score, we reserve the right not to supply you with goods or services on credit and/or require upfront payment for the goods or services you wish to purchase.
- 8.4 If you provide false or inaccurate information and we suspect fraud, we will record this. if you want to see your credit file, please contact us and we will provide you with the contact details of the credit agency we use.

## **9. LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA**

- 9.1 We will only use your personal data where the law allows us to. Most commonly, we will use your personal data in the following circumstances:
- 9.1.1 for performance of a contract we enter into with you;
  - 9.1.2 where necessary for compliance with a legal or regulatory obligation we are subject to; and
  - 9.1.3 for our legitimate interests (as described within this policy) and your interests and fundamental rights do not override these interests.

## **10. DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES**

- 10.1 In addition to the third parties mentioned above, we may disclose your information to third parties for our following legitimate interests as follows:
- 10.1.1 to staff members in order to facilitate the provision of goods or services to you;
  - 10.1.2 to our affiliated entities to support internal administration;
  - 10.1.3 IT software providers that host our website and store data on our behalf;
  - 10.1.4 professional advisers including consultants, lawyers, bankers and insurers who provide us with consultancy, banking, legal, insurance and accounting services;

- 10.1.5 HM Revenue and Customs, regulators and other authorities who require reporting of processing activities in certain circumstances; and
  - 10.1.6 third parties who we may choose to sell, transfer or merge parts of our business or assets. Alternatively, we may seek to acquire other business or merge with them. If a change happens to our business then the new owners may use your personal data in the same way as set out in this privacy policy.
- 10.2 We may disclose personal data to the police, regulatory bodies, legal advisors or similar third parties where we are under a legal duty to disclose or share personal data in order to comply with any legal obligation, or in order to enforce or apply our website terms and conditions and other agreements; or to protect our 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.
- 10.3 We will not sell or distribute personal data to other organisations without your approval.

## **11. CROSS-BORDER DATA TRANSFERS**

- 11.1 Where permitted by applicable law, we may transfer your personal data to the United States and other jurisdictions outside the European Economic Area ('EEA') for the purposes set out in this privacy policy. We have implemented binding corporate rules/standard contractual clauses approved by the European Commission/the EU-US Privacy Shield/Swiss-US Privacy Shield/consent to secure the transfer of your personal data to jurisdictions outside the EEA.

## **12. DATA SECURITY**

- 12.1 Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
- 12.2 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 information transmitted to our Site; any transmission is at your own risk.
- 12.3 Information you provide to us is shared on our secure servers. We have implemented appropriate physical, technical and organisational measures designed to secure your information against accidental loss and unauthorised access, use, alteration or disclosure. In addition, we limit access to personal data to those employees, agents, contractors and other third parties that have a legitimate business need for such access.

## **13. ACCESS TO, UPDATING, DELETING AND RESTRICTING USE OF PERSONAL DATA**

- 13.1 It is important that the personal data we hold about you is accurate and current. Please keep us informed if the personal data we hold about you changes.
- 13.2 Data protection legislation gives you the right to object to the processing of your personal data in certain circumstances or withdraw your consent to the processing of your personal data where this has been provided. You also have the right to access information held about you and for this to be provided in an intelligible form. If you would like a copy of some or all of your personal information, please send an email to [Suzanne@approachpr.com](mailto:Suzanne@approachpr.com). In certain circumstances we reserve the right to charge a reasonable fee to comply with your request.
- 13.3 You can also ask us to undertake the following:
  - 13.3.1 update or amend your personal data if you feel this is inaccurate;
  - 13.3.2 remove your personal data from our database entirely;
  - 13.3.3 send you copies of your personal data in a commonly used format and transfer your information to another entity where you have supplied this to us, and we

process this electronically with your consent or where necessary for the performance of a contract; or

13.3.4 restrict the use of your personal data.

13.4 We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal data that we hold about you or make your requested changes. Data protection legislation may allow or require us to refuse to provide you with access to some or all the personal data that we hold about you or to comply with any requests made in accordance with your rights referred to above. If we cannot provide you with access to your personal data, or process any other request we receive, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

13.5 Please send any requests relating to the above to our *Data Lead, Suzanne Watson* at *Suzanne@approachpr.com* specifying your name and the action you would like us to undertake.

#### **14. RIGHT TO WITHDRAW CONSENT**

Where you have provided your consent to the collection, processing and transfer of your personal data, you have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, if applicable, please contact us at *Suzanne@approachpr.com*.

#### **15. CHANGES TO OUR PRIVACY POLICY**

We reserve the right to update this privacy policy at any time, and any changes we make to our privacy policy will be posted on this page. We will notify you if there are any changes to this policy that materially affect how we collect, store or process your personal data. If we would like to use your previously collected personal data for different purposes than those we notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent, before using your personal data for a new or unrelated purpose. We may process your personal without your knowledge or consent where required by applicable law or regulation.

#### **16. CONTACT US**

We have appointed a *Data Lead* to oversee compliance with this privacy policy. If you have any questions, comments or requests regarding this policy or how we use your personal data please contact our *Data Lead, Suzanne Watson* at *Suzanne@approachpr.com / 01943 603805*. This is in addition to your right to contact the Information Commissioners Office if you are unsatisfied with our response to any issues you raise at <https://ico.org.uk/global/contact-us/>

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