



## PRIVACY NOTICE

### Effective Date

May 2024

## Who we are

Your personal information is collected by Inskin Media Ltd, registered in England under company number 06080497. We respect your privacy and are committed to protecting your personal information. This notice will inform you how we look after your personal data:

- Visitors: Visitors to our website
- Platform Users: Users of our creative platform
- Users: End users of our digital advertisements
- Customers: Businesses that purchase our services
- Prospects: Businesses who enquire about our services
- Candidates: Individuals who enquire about working for us

We also use this privacy notice to tell you about your privacy rights and how the law protects you.

Inskin Media is involved in the AdTech industry, providing creative solutions for digital branding and facilitating the development, serving and distribution of digital ads on electronic devices.

### IAB Europe's GDPR Transparency and Consent Framework

We are registered on [IAB Europe's Framework](#), with vendor ID number 150 and we comply with the specifications and policies of IAB Europe's Transparency & Consent Framework. We only work with third party tracking vendors who are also registered to this list, or who we have independently assessed for GDPR compliance (**Partners**).

### Interest-Based Advertising

We use a Data Management Platform (DMP) service provided by Lotame for interest-based advertising. Third party data in Lotame may contain personally identifiable information (PII); however Inskin Media does not store or make use of this.

Lotame's DMP creates profiles through the use of cookies, pixel tags, SDKs (software development kits), secure file transfers, server to server connections, or other unique identifiers provided to Lotame by Customers, to learn about your journey. This information is used only to help us show you more relevant marketing content.

Also, we use Improve Digital as our ad server which uses tracking technologies of its own.

To learn more about their processing please visit Lotame's [privacy policy](#), Improve Digital's [privacy policy](#) or Oracle's [privacy policy](#).

### Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

### Children

While our website is designed for a general audience, we will not knowingly collect information of children under the age of 13, and in some jurisdictions the personal information of children under the age 16.

If you believe we might have any personal information from or about a person under the age of 13 (or under the age of 16 in some jurisdictions), please email us at [dpo@azerion.com](mailto:dpo@azerion.com).

### Changes to the privacy notice

We keep our privacy notice under regular review. Historic versions can be obtained by contacting us at [dpo@azerion.com](mailto:dpo@azerion.com).

Depending on how you interact with us, will determine how we process your data:

## If you are a visitor to our website

### INFORMATION WE COLLECT

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).

The information we collect, use, store and transfer depends on whether you have requested us to contact you or whether you are just browsing our website.

The information collected when you browse our website will also be dependent on whether you consented to additional cookies being downloaded. If you have, please see our cookie policy for more information.

The Your data we collect can be grouped together as follows:

- **Identity Data** includes first and last name when you ask us to be contact you or a unique identifier ID if accept cookies other than strictly necessary
- **Contact Data** email address, again only if you ask us to contact you
- **Technical Data** includes internet protocol (IP) address, 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.
- **Usage Data** includes information about how you use our website and services, urls visited, this will be dependent on what cookies you have consented to

### Special categories of personal information

Inskin Media does not process any sensitive personal data.

### HOW YOUR DATA IS USED

In simple terms we use your data only two ways. If you complete our contact form we will contact you to discuss your requirements, which may lead to you becoming a customer.

Alternatively we may use your visit and movement around our website to assess the effectiveness of the website.

The table below details specifically how we may use your data when you are Website Visitor:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer and provide our services as requested when you complete the contact us form	(a) Identity (b) Contact	Necessary for our legitimate interests (to provide our services)
To manage our relationship with you which will include notifying you about changes to our terms or privacy notice	(a) Contact	Necessary for our legitimate interests (to keep our records updated)

To administer and protect our business and this website (including troubleshooting, data analysis, testing, and system maintenance)	(a) Technical	Necessary for our legitimate interests (for running our business, provision of website and network security)
To use data analytics to improve our website, marketing and user experiences	(a) Identity (b) Technical (c) Usage	Necessary for our legitimate interests (to develop our business and to inform our marketing strategy)

## Marketing

**Third-party marketing** - we will not share your data with any third parties for the purposes of direct marketing.

**Opting out** - you can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you.

**Cookies** - you can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

**Change of purpose** – Your data will only be used 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at [dpo@azerion.com](mailto:dpo@azerion.com).

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

## WHO WE SHARE YOUR DATA WITH

There are certain circumstances where we may need to share your data with our Inskin Media Group Companies and Third Party Service Providers. For example, if you use our contact form and are in Australia, we will pass your details to our Australian Offices so they can deal with your request in the correct time zone. Third-party service providers include our IT systems where the information will be stored or used to contact you, for example Gmail.

Your data may be transferred to other third party organisations in certain scenarios:

- if we discuss selling or transferring part or all of our business – the information may be transferred to prospective purchasers under suitable terms as to confidentiality
- if we are reorganised or sold, information may be transferred to a buyer who can continue to provide services to you
- if we're required to by law, or under any regulatory code or practice we follow, or if we are asked by any public or regulatory authority – for example the Police
- if we are defending a legal claim your information may be transferred as required in connection with defending such claim

In all cases we ensure that we have appropriate technical and organisational measures in place to protect your data to the highest standard.

## If you are a platform user

### INFORMATION WE COLLECT

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).

The data we collect when you are a user of our creative platform can be grouped together as follows:

- **Identity Data** includes first and last name

- **Contact Data** email address
- **Technical Data** includes internet protocol (IP) address, 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 our creative platform
- **Usage Data** includes information about how you use our creative platform, impressions visited and creatives uploaded

### Special categories of personal information

Inskin Media does not process any sensitive personal data.

## HOW YOUR DATA IS USED

In simple terms we use your data only two ways. To determine how frequently you are using our platform and to assess the effectiveness of the platform and the overall concept.

The table below details specifically how we may use your data when you visit our creative platform:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a platform user	(a) Identity (b) Contact	Necessary for our legitimate interests (to provide our services)
To manage our relationship with you which will include notifying you about changes to our platform	(a) Contact	Necessary for our legitimate interests (to keep our records updated)
To administer and protect our business and platform (including troubleshooting, data analysis, testing, and system maintenance)	(a) Technical	Necessary for our legitimate interests (for running our business, provision of platform and network security)
To use data logs to improve our platform and user experiences	(a) Identity (b) Technical (c) Usage	Necessary for our legitimate interests (to develop our business and to inform the development of our platform)

### Marketing

We will not use the contact details from the creative platform to market to you. We will only use your details for transactional messages telling you about the availability of the platform or planned downtimes for maintenance. If we do direct marketing it is because you are a Publisher or Advertiser/agency, so please see those sections in the notice to see when we use your details for direct marketing.

**Cookies** – there will be no cookies on the platform, other than what is strictly necessary to deliver the creative platform.

**Change of purpose** – Your data will only be used 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at [dpo@azerion.com](mailto:dpo@azerion.com).

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

## WHO WE SHARE YOUR DATA WITH

There are certain circumstances where we may need to share your data with our Inskin Media Group Companies and Third Party Service Providers. Third-party service providers include our IT systems where the information will be stored or used to contact you, for example Gmail or Salesforce.

Your data may be transferred to other third party organisations in certain scenarios:

- if we discuss selling or transferring part or all of our business – the information may be transferred to prospective purchasers under suitable terms as to confidentiality
- if we are reorganised or sold, information may be transferred to a buyer who can continue to provide services to you
- if we're required to by law, or under any regulatory code or practice we follow, or if we are asked by any public or regulatory authority – for example the Police
- if we are defending a legal claim your information may be transferred as required in connection with defending such claim

In all cases we ensure that we have appropriate technical and organisational measures in place to protect your data to the highest standard.

## If you are a publisher

### INFORMATION WE COLLECT

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).

As a Publisher the information we collect, use, store and transfer depends on what services you use and how you use them.

The data we collect from a Publisher can be grouped together as follows:

- **Identity Data** includes first and last name, company
- **Contact Data** includes billing address, email address and telephone numbers.
- **Financial Data** includes company bank account details
- **Transaction Data** includes details about payments to and from you and other details of services we have purchased from you
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

### Special categories of personal information

Inskin Media does not process any sensitive personal data.

### HOW WE COLLECT YOUR DATA

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

- **Direct interactions.** You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - enquire about our services
  - request marketing to be sent to you
  - give us feedback or contact us
- **Third parties.** We may use third-party social media platforms such as LinkedIn to obtain your Contact Data, so we can reach out to you directly.

### HOW WE USE YOUR DATA

In simple terms we use your data to provide Inskin Media services. More specifically, and dependent on your privacy choices, your data is used for the following purposes:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new publisher: (a) Provide our services (b) Manage our systems (c) Send marketing communications (d) Share information with third parties	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to provide our services)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy notice (b) Resolving technical issues (c) Providing feedback on our service	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to keep our records updated and to study how customers use our services)

## Marketing

**Third-party marketing** - we will not share your data with any third parties for the purposes of direct marketing.

**Opting out** - you can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you.

**Change of purpose** – Publisher data will only be used 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at [dpo@azerion.com](mailto:dpo@azerion.com).

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

## WHO WE SHARE YOUR DATA WITH

There are certain circumstances where we share Publisher data with the following categories of recipients:

**Inskin Media Group Companies and Third Party Service Providers:** We may share Publisher data with group companies and third-party service providers who provide data processing services to us, for example, payment processing, product fulfilment, technical infrastructure, engineering and other technical support, and email and customer support.

**Adtech Partners:** We may share Publisher data with other ad tech partners (including for example, other vendors registered with the IAB's TCF) for the purposes described in the "How we use your data" section.

Publisher data may be transferred to other third party organisations in certain scenarios:

- if we discuss selling or transferring part or all of our business – the information may be transferred to prospective purchasers under suitable terms as to confidentiality
- if we are reorganised or sold, information may be transferred to a buyer who can continue to provide services to you
- if we're required to by law, or under any regulatory code or practice we follow, or if we are asked by any public or regulatory authority – for example the Police
- if we are defending a legal claim your information may be transferred as required in connection with defending such claim

Your data may also be shared with third parties if it is made anonymous and aggregated. In such circumstances the information will cease to be personal data.

## If you are an advertiser/agency

### INFORMATION WE COLLECT

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).

The information we collect, use, store and transfer depends on what services you use and how you use them.

Advertiser/agency data collected can be grouped together as follows:

- **Identity Data** includes first and last name, company
- **Contact Data** includes billing address, email address and telephone numbers
- **Financial Data** includes company bank account details
- **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences

### Special categories of personal information

Inskin Media does not process any sensitive personal data.

### HOW WE COLLECT YOUR DATA

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

- **Direct interactions.** You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - enquire about our services
  - request marketing to be sent to you
  - give us feedback or contact us
- **Third parties.** We may use third-party social media platforms such as LinkedIn to obtain your Contact Data, so we can reach out to you directly.

### HOW IS YOUR DATA USED

In simple terms we use your data to provide Inskin Media services. More specifically, and dependent on your privacy choices, your data is used for the following purposes:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer: (a) Provide our services (b) Manage our systems (c) Prevent fraud (d) Send marketing communications (e) Share information with third parties	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to provide our services)

<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy notice</p> <p>(b) Resolving technical issues</p> <p>(c) Providing feedback on our service</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our services)</p>
<p>Information that we collect incidentally from other sources or public sources, including LinkedIn. We use this information, including to:</p> <p>(a) Maintain market awareness</p> <p>(b) Identify potential customers</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Marketing and Communications</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>

## Marketing

**Third-party marketing** - we will not share your data with any third parties for the purposes of direct marketing.

**Opting out** - you can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you.

**Change of purpose** – Advertiser/agency data will only be used 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at [dpo@azerion.com](mailto:dpo@azerion.com).

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

## WHO WE SHARE YOUR DATA WITH

There are certain circumstances where we share Publisher data with the following categories of recipients:

**Inskin Media Group Companies and Third Party Service Providers:** We may share Publisher data with group companies and third-party service providers who provide data processing services to us, for example, payment processing, product fulfilment, technical infrastructure, engineering and other technical support, and email and customer support.

**Adtech Partners:** We may share Publisher data with other ad tech partners (including for example, other vendors registered with the IAB's TCF) for the purposes described in the "How we use your data" section.

Advertiser/agency data may be transferred to other third party organisations in certain scenarios:

- if we discuss selling or transferring part or all of our business – the information may be transferred to prospective purchasers under suitable terms as to confidentiality
- if we are reorganised or sold, information may be transferred to a buyer who can continue to provide services to you
- if we're required to by law, or under any regulatory code or practice we follow, or if we are asked by any public or regulatory authority – for example the Police
- if we are defending a legal claim your information may be transferred as required in connection with defending such claim

Your data may also be shared with third parties if it is made anonymous and aggregated. In such circumstances the information will cease to be personal data.



# If you see our advertisements

## INFORMATION WE COLLECT

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).

Your data we collect can be grouped together as follows:

- **Identity Data** includes unique advertising ID in some of our cookies
- **Technical Data** includes internet protocol (IP) address, 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.
- **Ad Engagement Data** includes content, format, User interaction, approximate geolocation and display location.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your data but is not considered personal data in law as this data will not directly or indirectly reveal your identity.

For example, we may aggregate the Ad Engagement Data to calculate the percentage of users accessing a specific website feature.

### Special categories of personal information

Inskin Media does not process any sensitive personal data for ad serving nor any personal data that is directly personally identifiable.

## HOW WE COLLECT YOUR DATA

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

- **Automated technologies or interactions.** As you interact with our ads, we will automatically collect Technical and Ad Engagement Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.
- **Third parties** such as Publishers, Partners or other audience data partners, media agencies and supply side platforms. We receive this data in different ways including by means of third party tags and syncing methods.

## HOW IS YOUR DATA USED

In simple terms we use your data to provide Inskin Media services. More specifically, and dependent on your privacy choices, your data is used for the following purposes:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To deliver relevant ads	(a) Technical (b) Ad Engagement	(a) Necessary for our legitimate interests (to study how users engage with ads, to develop them, to grow our business and to inform our marketing strategy) (b) Consent
To use data analytics to personalise ad content, marketing and user experiences	(a) Identity (b) Technical	(a) Necessary for our legitimate interests (to define audiences, to keep ad content updated and relevant, to develop our

	(c) Ad Engagement	business and to inform our marketing strategy) (b) Consent
To make suggestions and recommendations to you about ads that may be of interest to you	(a) Identity (b) Technical (c) Ad Engagement	Necessary for our legitimate interests (to develop our services and grow our business) (b) Consent
To measure the performance and effectiveness of our ads that you see or interact with	(a) Identity (b) Technical (c) Ad Engagement	(a) Necessary for our legitimate interests (to develop our services and grow our business) (b) Consent
To use market research to learn more about the audiences who visit apps and/or view our ads	(a) Identity (b) Technical (c) Ad Engagement	(a) Necessary for our legitimate interests (to develop our services and grow our business) (b) Consent
Information that we collect incidentally from other sources or public sources to personalise our ads and target interested parties	(a) Identity (b) Technical (c) Ad Engagement	Necessary for our legitimate interests (to develop our products/services and grow our business)

## Marketing

We strive to provide you with choices regarding your data, particularly around marketing and advertising.

**Third-party marketing** - we will not share your data with any third parties for the purposes of direct marketing.

**Cookies** - you can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the website you are viewing may become inaccessible or not function properly.

**Change of purpose** – your data will only be used 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at [dpo@azerion.com](mailto:dpo@azerion.com).

## WHO WE SHARE YOUR DATA WITH

There are certain circumstances where we share your data with the following categories of recipients:

**Publishers and Partners:** We may share data with Publishers and Partners for the purposes described in the “How is your data used” section above, including for example, for measurement and reporting to aid in their understanding of how you are engaging with our ads.

**Inskin Media Group Companies, Third Party Service Providers:** We may share your data with group companies and third-party service providers who provide data processing services to us, for example, product fulfilment, technical infrastructure, engineering and other technical support.

**Adtech Partners:** We may share your data with other ad tech partners (including for example, other vendors registered with the IAB's TCF) for the purposes described in the "How is your data used" section.

Your data may be transferred to other third party organisations in certain scenarios:

- if we discuss selling or transferring part or all of our business – the information may be transferred to prospective purchasers under suitable terms as to confidentiality
- if we are reorganised or sold, information may be transferred to a buyer who can continue to provide services to you
- if we're required to by law, or under any regulatory code or practice we follow, or if we are asked by any public or regulatory authority – for example the Police
- if we are defending a legal claim your information may be transferred as required in connection with defending such claim

Your data may also be shared with third parties if it is made anonymous and aggregated. In such circumstances the information will cease to be personal data.

## If you are applying for a job with us

### INFORMATION WE COLLECT

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).

The data we collect can be grouped together as follows:

- **Identity Data** includes first name, last name or title
- **Contact Data** includes home address, email address and telephone numbers
- **Financial Data** includes bank account details to either reimburse expenses or if successful for payroll
- **Employment Data** includes history of previous roles
- **Education Data** includes all your education data
- **Special Category Data** not for all candidates, but we may require health data only to make the necessary adjustments for interviews etc.

### HOW WE COLLECT YOUR DATA

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

- **Direct interactions.** You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - enquire about vacancies
  - applying for jobs
  - sending us your CV
- **Third parties** such as Recruiters/agencies and job advertising platforms.

### HOW IS YOUR DATA USED

In simple terms we use your data to provide Inskin Media services. More specifically, and dependent on your privacy choices, your data is used for the following purposes:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a candidate: (a) Shortlist for job (b) Review your CV	(a) Identity (b) Contact (c) Employment	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to determine your suitability for the role)

(c) Share information with internal departments	(d) Education	
To manage our relationship with you which will include: (a) Notifying you about progress of your application (b) Answering any questions you have about the role and the company (c) Providing feedback on your interview	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to determine your suitability for the role)
To provide a suitable interview environment	(a) Identity (b) Contact (c) Special Category	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to determine your suitability for the role) (c) Necessary to comply with a legal obligation

### Marketing

We will not share your data with any third parties for the purposes of direct marketing.

**Change of purpose** – your data will only be used 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at [dpo@azerion.com](mailto:dpo@azerion.com).

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

### WHO WE SHARE YOUR DATA WITH

There are certain circumstances where we share your data with the following categories of recipients:

**Inskin Media Group Companies, Third Party Service Providers:** We may share your data with group companies and third-party service providers who provide data processing services to us, for example, payment processing, product fulfilment, technical infrastructure, email and other technical support.

Your data may be transferred to other third party organisations in certain scenarios:

- if we discuss selling or transferring part or all of our business – the information may be transferred to prospective purchasers under suitable terms as to confidentiality
- if we are reorganised or sold, information may be transferred to a buyer who can continue to provide services to you
- if we're required to by law, or under any regulatory code or practice we follow, or if we are asked by any public or regulatory authority – for example the Police
- if we are defending a legal claim your information may be transferred as required in connection with defending such claim

Your data may also be shared with third parties if it is made anonymous and aggregated. In such circumstances the information will cease to be personal data.

### International transfers

Most of our data processing takes place within the UK, however we employ some services which are based outside of the UK. In these cases, limited personal data (for example we use Gmail) is passed to another country (e.g. USA).

Whenever we transfer your data out of the UK, 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 data to countries that have been deemed to provide an adequate level of protection for personal data under the UK adequacy regulations. For further details, see Information Commissioner's Office (ICO): [Adequacy of the protection of personal data in non-UK countries](#).
- Where we use certain service providers, we may use specific contracts approved by the European Commission and amended by the ICO which give personal data the same protection it has in the UK. For further details, see ICO's: [Model contracts for the transfer of personal data to third countries](#).
- In the absence of an adequacy decision or appropriate contractual safeguards we may rely on derogations for specific situations. For further details, see GDPR Article 49: [Derogations for specific situations](#).

Please contact us at [dpo@azerion.com](mailto:dpo@azerion.com) if you want further information on the specific mechanism used by us when transferring your data out of the UK.

## Security measures to protect your data

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

## Our sub-processors

For a list of our sub-processors see [\[link to sub-processors\]](#).

## How long will we use your data

We will only retain your 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 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 your data, we consider the amount, nature and sensitivity of the data, the potential risk of harm from unauthorised use or disclosure of your data, the purposes for which we process your data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity and Transaction Data) for 6 years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data, see below "Exercising your rights".

Sometimes we will anonymise Your data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## Exercising your rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. 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:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful, but you do not want us to erase it.
- 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.
- 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.

If you wish to exercise any of the rights set out above, please contact us using [dpo@azerion.com](mailto:dpo@azerion.com).

### IP addresses

Subject access requests for IP addresses will require proof from the requestor that they own the IP address. Fulfilment of such requests may not be possible as IP obfuscation renders the data unidentifiable and therefore unavailable.

### No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

### What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal

data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### Subject Access Request as a Service (SARaaS)

We are committed to providing the information you request as part of your Data Subject Access Request and have procedures in place to ensure this occurs in a timely fashion.

We do not have agreements in place with any third-party platforms that offer "Subject Access Requests as a Service". As a responsible data controller of your personal information this represents significant risks when sharing data. The right of access afforded to you, does not obligate us to share data with third-parties. It is our policy to provide the information directly to data subjects ensuring the safety and security of the information throughout the process.

We will monitor future guidance from the Information Commissioner's Office but will follow our reasonable measures to verify the identity of data subjects. We would like to assure you that the protection of your data is our main concern and we are committed to providing information as part of any valid request.

This policy will also apply to the rights set out below.

### Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## Contact us or make a complaint

If you have any questions about this privacy notice or our privacy practices, please contact us at [dpo@azerion.com](mailto:dpo@azerion.com).

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## Glossary

### Lawful Basis

**Legitimate interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of a contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

**Consent** means processing your data where you have freely given, specific, informed and unambiguous indication of your wishes.