



PRIVACY POLICY

LAST UPDATED 23 MAY 2018

ClipperTech Ltd take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the [General Data Protection Regulation](#), which applies across the European Union (including in the United Kingdom) and we are responsible as ‘controller’ of that personal data for the purposes of those laws.

OVERVIEW OF PROCESSING

We collect and use limited personal data about individuals who visit our website, who contact us for any reason, who attend our events and otherwise engage with us, who contract with us as customers for the use of our service, and who visit the websites and/or applications of our customers (or their clients). This table gives an overview of individuals we collect personal data about, and the personal data we typically collect. The information in this table is not exhaustive, and more detailed information may be contained in the following sections of this policy.

Any other information you provide to us through our website, including via our contact form or live chat function. Any other information our customers or their clients collect from or about you and provide to us. We will assume that the online identifier data provided to us by our agency customers (and their clients, if applicable), or by our direct brand customers, is done so on the basis that the entity providing your personal data has your consent or another valid reason to process your data. The standard terms and conditions we ask all our customers or those contracting with us to sign include representations that any personal data provided to us is done so legitimately.

INDIVIDUALS	PERSONAL DATA COLLECTED
Agency and customers contacts for our customers who wish to use our products or services.	Customer contact information, including name, title, business address, email address and telephone number.
Information about visitors to our website.	Information about your visit to our website, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouseovers), and methods used to browse away from the page and any phone number used to call our or their customer service number.
Information about end users who visit the websites and applications of our agency customers, or their clients, or our direct customers.	IP address; cookie ID or advertising ID; and any other personal data that our customers wish us to collect about their (or their clients’) end users (including, for example, user ID).
Customers and other individuals or entities whose personal data we hold in our marketing database.	Your contact information, including email address, telephone number and company details, and (if applicable) your responses to surveys, competitions and promotions provided from you through your use of our website contact form, live chat service, attendance at events including talks, presentations and seminars, downloading content on our website. We also may receive personal data through our third party data partners. See below “How your personal data is collected”

HOW YOUR PERSONAL DATA IS COLLECTED

We collect some of this personal data directly from you in person, by telephone, text or email and/or via our website (including our contact form and live chat function) and apps. However, we also collect information:

- from our customers or their clients, whose websites you visit, and whom we provide with code for inclusion on their website and/or mobile applications to enable the collection of information and statistics on individuals visiting and using our customer’s or its clients’ website and/or applications, so that we can model, analyze and measure its or their TV advertising performance
- from you, directly, including through your use of our website contact form, live chat service, attendance at events including talks, presentations and seminars, downloading content on our website
- from data partners with whom we contract to provide us with certain data to help improve our products and services
- from publicly accessible sources, e.g. Companies House or HM Land Registry
- from cookies on our website—for more information on our use of cookies, please see below (**“Cookies”**)

COOKIES

Our site uses cookies to distinguish you from other users of our site or the sites of our customers or their clients. This helps us to provide you with a good experience when you browse our site and also allows us, our customers and their clients to improve our site. A cookie is a small file which asks permission to be placed on your computer’s hard drive. Once you agree, the file is added and the cookie helps analyze web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us to analyze data about web page traffic and improve our site in order to tailor it to your needs. From our perspective, we only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives access to your computer or any information about you, other than the data you choose to share. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

HOW AND WHY WE USE YOUR PERSONAL DATA

Under data protection law, we can only use your personal data if we have a proper reason for doing so, e.g.:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or your agent or client, or to take steps at your or your agent or client’s request before entering into a contract;
- for the performance of our contract with our customers whose websites you may visit;
- for our legitimate interests or those of a third party; or
- where you have given consent to us, our customers or our customers’ clients.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal data for and our reasons for doing so:

WHAT WE MAY USE YOUR PERSONAL DATA FOR	OUR REASONS
To provide products or services to you, or your clients, including to provide you with details of any changes to our services and to allow you to participate in interactive features of our service, if you choose to do so.	For the performance of our contract with you, or your clients or to take steps at your request before entering into a contract
To provide products and services to our customers or their clients whose websites you may visit.	For our legitimate interests or those of a third party e.g. the performance of our contracts with our customers or their clients.
To prevent and detect fraud against you or ClipperTech Ltd.	For our legitimate interests or those of a third party, i.e. to minimise fraud that could be damaging for us and for you.
Conducting checks to identify our customers, their agent and/or their clients and verify their identity. Screening for financial and other sanctions or embargoes Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety regulation or rules issued by our professional regulator.	To comply with our legal and regulatory obligations.
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies.	To comply with our legal and regulatory obligations.
Ensuring business policies are adhered to, e.g. policies covering security and internet use.	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service.
Operational reasons, such as improving efficiency, troubleshooting, data analysis, testing, research, statistical and survey purposes, training and quality control.	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price.
Ensuring the confidentiality of commercially sensitive information.	For our legitimate interests or those of a third party, i.e. to protect trade secrets and other commercially valuable information. To comply with our legal and regulatory obligations.
Statistical analysis to help us manage our business, e.g. in relation to our commercial or financial performance, customer base, product range and use or other efficiency measures.	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service at the best price.
To ensure the safety and security of our systems, including preventing unauthorised access and modifications to systems.	For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you. To comply with our legal and regulatory obligations.
Updating and enhancing customer records.	For the performance of our contract with you, your agent or your clients, or to take steps at your request before entering into a contract. To comply with our legal and regulatory obligations. For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our customers about existing orders and new products.
Statutory returns.	To comply with our legal and regulatory obligations.
Ensuring safe working practices, staff administration and assessments.	To comply with our legal and regulatory obligations. For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service.
Marketing our services [and those of selected third parties] to: —existing and former customers; —third parties who have previously expressed an interest in our services; and —third parties with whom we have had no previous dealings.	For our legitimate interests or those of a third party, i.e. to promote our business to existing and former customers.
Credit reference checks via external credit reference agencies.	For our legitimate interests or those of a third party, i.e. to ensure our customers are likely to be able to pay for our products and services.
External audits and quality checks, e.g. for ISO or Investors in People accreditation and the audit of our accounts.	For our legitimate interests or a those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards. To comply with our legal and regulatory obligations.

ClipperTech Ltd The above table does not apply to special category personal data, which we will only process with your explicit consent.

PROMOTIONAL COMMUNICATIONS

We may use your personal data to send you updates (by email, text message, telephone or post) about our products and services, including exclusive offers, promotions or new products and services.

We have a legitimate interest in processing your personal data for promotional purposes (see above ‘**How and why we use your personal data**’). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal data with the utmost respect and never sell or share it with other organizations outside ClipperTech Ltd for marketing purposes, without your consent or the consent of your agent or client as appropriate.

You have the right to opt out of receiving promotional communications at any time by:

- contacting us at sales@clippertech.co.uk; or
- using the ‘unsubscribe’ link in emails.

We may ask you to confirm or update your marketing preferences if you instruct us to provide further products or services in the future, or if there are changes in the law, regulation, or the structure of our business.

WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We routinely share personal information with:

- third parties we use to help deliver our products and services to you, your agent, your clients and our customers whose websites you may visit, e.g. business partners, suppliers, sub-contractors and payment service providers
- other third parties we use to help us run our business, e.g. website hosts and analytics and search engine providers
- third parties approved by you, your agent or your client as appropriate, e.g. social media sites you choose to link your account to or third-party payment providers

We only allow our business partners, subcontractors and other suppliers or service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on them relating to ensure they can only use your personal data to provide services to us and to you. We may also share personal data with external auditors.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal data with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymized but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

WHERE YOUR PERSONAL DATA IS HELD

Information may be held at our offices, third party agencies, service providers, representatives and agents as described above (see above: ‘**Who we share your personal data with**’).

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal data when this occurs, see below: ‘**Transferring your personal data out of the EEA**’.

HOW LONG YOUR PERSONAL DATA WILL BE KEPT

We will keep your personal data while we are providing products or services to you, your agent, your clients or our customers whose websites and/or applications you may visit. Thereafter, we will keep your personal data only as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly; and
- to keep records required by law.

We will not retain your personal data for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal data.

TRANSFERRING YOUR PERSONAL DATA OUT OF THE EEA

To deliver services to you, it is sometimes necessary for us to share your personal data outside the European Economic Area (EEA), e.g.:

- with our offices outside the EEA;
- with your and our service providers located outside the EEA;
- if you are based outside the EEA; or
- where there is an international dimension to the services we are providing to you.

These transfers are subject to special rules under European and UK data protection law.

These non-EEA countries do not have the same data protection laws as the United Kingdom and EEA. We will, however, ensure the transfer complies with data protection law and all personal data will be secure. If you would like further information, please contact ClipperTech Ltd.

YOUR RIGHTS

You have the following rights, which you can exercise free of charge:

ACCESS.	The right to be provided with a copy of your personal data (the right of access).
RECTIFICATION.	The right to require us to correct any mistakes in your personal data.
TO BE FORGOTTEN.	The right to require us to delete your personal data—in certain situations.
RESTRICTION OF PROCESSING.	The right to require us to restrict processing of your personal data—in certain circumstances, e.g. if you contest the accuracy of the data.
DATA PORTABILITY.	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations.
TO OBJECT.	The right to object: —at any time to your personal data being processed for direct marketing (including profiling); and —in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests.
NOT TO BE SUBJECT TO AUTOMATED INDIVIDUAL DECISION-MAKING.	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- email, call or write to us—see below: '[How to contact us](#)'; and
- let us have proof of your identity and address (a copy of your driving license or passport and a recent utility or credit card bill); and
- let us have enough information to identify you (e.g. your full name, address and customer reference number);
- let us know what right you want to exercise and the information to which your request relates.

KEEPING YOUR PERSONAL DATA SECURE

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality. We continually test our systems and follow industry standards for information security.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

HOW TO COMPLAIN

We hope that **we** can resolve any query or concern you may raise about our use of your information.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

CHANGES TO THIS PRIVACY POLICY

This privacy notice was last updated on 23 May 2018. We may change this privacy notice from time to time.

HOW TO CONTACT US

Please contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

Contact address: Privacy Team, ClipperTech Ltd, Station House, 4 Station Road, Oakley, Dunfermline, KY12 9QF

Phone contact: +44 (0)1383 851133

Email address: sales@clippertech.co.uk

DO YOU NEED EXTRA HELP?

If you would like this notice in another format (for example audio, large print, braille) please contact us (see '[How to contact us](#)' above).