



## **POLIMONITOR – PRIVACY POLICY**

### **Introduction**

This policy applies to any individual who is dealing with PoliMonitor Limited. In this policy, references to **we**, **us** or **our** means PoliMonitor Limited.

We respect your privacy and are committed to protecting your personal data. This privacy policy will tell you how we look after your personal data and tell you about your privacy rights and how the law protects you.

We collect your personal data in various ways, including:

- when you visit our website at [polimonitor.com](http://polimonitor.com) (regardless of where you visit it from);
- when you apply for a subscription or otherwise enter into an agreement with us for us to provide services to you; and
- when we receive an e-mail, phone call, letter or other communication from you.

There is more information in [section 3](#).

Please use the [glossary in section 11](#) to understand the meaning of some of the terms used in this privacy policy.

### **1. Important information and who we are**

#### ***Controller***

PoliMonitor Limited, a company incorporated in England and Wales, is the controller and responsible for your personal data. Further information about the company is set out below:

Company registration number: 10709119

Registered office address: 1-15 Techhub London, Clere Street, London EC2A 4UY

E-mail address: [info@polimonitor.com](mailto:info@polimonitor.com)

This privacy policy aims to give you information on how we collect and process your personal data.

#### ***Data Privacy Officer***

We have appointed a data privacy officer, who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights (as set out in [section 10](#)), please contact the data privacy manager using the details set out below.

Data privacy manager: Samuel Cunningham

Email address: [dpo@polimonitor.com](mailto:dpo@polimonitor.com)

Postal address: 1-15 Techhub London, Clere Street, London EC2A 4UY

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](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.

### ***Changes to our privacy policy and changes to your details***

This version was last updated on 4 June 2020, to ensure compliance with the EU General Data Protection Regulation (**GDPR**) and the Data Protection Act 2018 (**DPA 2018**).

It is important that the personal data we hold about you is accurate and up to date. Please keep us informed if your personal data changes during your relationship with us.

## **2. The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data) or aggregated data (data about the use of our website by visitors as a whole, which does not identify any particular individual).

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

- **Identity Data** includes first, middle and family names; title and gender;
- **Contact Data** includes details of who you work for; your job/role title; work addresses; work email addresses; work and mobile telephone numbers and instant messaging identities.
- **Financial Data** includes bank account and payment card details.
- **Technical Data** includes your IP address, browser type, operating system, time zone, websites visited before and after you visit our website, pages searched on our website, length of time spent on our site, types of interaction with our website (eg scrolls, clicks etc) and data and time of your actions.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We do not currently collect or process special categories of data (that is, personal data relating to your ethnic origin, sexual orientation or your religion or your medical or biometric data).

## **3. How is your personal data collected?**

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

- **Direct interactions.** You may give us your Identity and Contact Data by contacting us through our website or by corresponding with us by post, phone, email or otherwise. You may give us your Financial Information if you subscribe for our services as an individual. You may give us Technical Information when you use our website or send us electronic communications.
- **Third parties.** The organisation you work for may give us your contact details.

## **4. How and why we use your personal data**

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

- where we are preparing to enter into or have entered into a contract with you or the organisation you work for;

- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; or
- where we need to comply with a legal or regulatory obligation.

To find out more about the types of lawful basis that we will rely on to process your personal data, please refer to the glossary in [section 11](#).

Generally, we do not rely on consent as a legal basis for processing your personal data.

### ***Purposes for which we will use your personal data***

We have set out below a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing, basis of legitimate interest</b>
To answer questions you may have about our services and to prepare to enter into a contract with you or the organisation you work for	Identity Contact	In preparation for entering into and performing a contract with you or the organisation you work for (ie to provide our services via a subscription or by separate agreement)  For our legitimate interests (we may need to check that your credit card or other payment methods work)
To provide the services described on our website or agreed with you	Identity Contact Financial Marketing and Communications	Performance of a contract with you or the organisation you work for (to provide the services as described above)  For our legitimate interests (i.e. in order to run our operations and comply with our obligations to tax authorities and other interested third parties and to keep our subscribers informed of our activities)
To manage our relationship with you if you are a supplier of ours	Identity Contact Financial Data	Performance of a contract with you or the organisation you work for  For our legitimate interests (e.g. to effectively manage our supplier relationships – and to pay our suppliers)
To deliver relevant marketing and other similar materials to you	Identity Contact Marketing and Communications	Necessary for our legitimate interests (to provide our subscribers and potential subscribers with useful and relevant information about our services)

### ***Change of purpose***

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

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

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

## **5. Marketing**

We want to provide you with choices regarding certain personal data uses, particularly around marketing. We may use your Identity and Contact Data to send you material as set out in the [table](#) in section 4 if:

- you are or have expressed an interest in subscribing to our services; or
- you have opted-in to receiving that material

and, in both cases, you have not opted out of receiving that marketing.

### ***Opting out***

You can ask us to stop sending you marketing messages at any time by [contacting us](#) at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us in the context of our performing a contract.

### ***Cookies***

You can read our policy on cookies [here](#).

## **6. Disclosures of your personal data**

We may have to share your personal data with External Third Parties (as set out in the glossary in [section 11](#)) for the purposes set out in the [table](#) in section 4.

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

## **7. International transfers**

We are based in the UK but provide our services to subscribers worldwide. We do not expect to export your personal data outside the European Economic Area unless you are outside the EEA.

## **8. Data security**

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

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

## 9. 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.

Our policy is to retain personal data for six years after the last occasion the individual concerned communicated with us or the expiry or termination of the relevant subscription or similar agreement.

In some circumstances you can ask us to delete your data: see [section 10](#) for further information.

In some circumstances we may anonymise your personal 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.

## 10. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. To summarise, 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; or
  - 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 wish to exercise any of the rights set out above, please [contact us](#).

#### ***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 may 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.

#### ***Time limit to respond***

We try to respond to all legitimate requests within one month. Occasionally it may 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.

## **11. Glossary**

### ***Lawful bases for processing your personal data***

**Legitimate Interest** the interest of our company and any group companies in conducting and managing our operations so as to comply with our legal obligations and to run an efficient and profitable business. 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](#);

<b>Performance of Contract</b>	processing your data where it is necessary for the performance of a contract to which you or the organisation for which you work are a party (ie the agreement to provide our services) or to take steps at your request before entering into such a contract;
<b>Comply with a legal or regulatory obligation</b>	processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to (e.g. regulations relating to money laundering and to tax);

***Third parties we may pass your personal data to***

- External Third Parties**
- service providers acting as processors, including our providers of IT system management and information security; and
  - professional advisers acting as processors or joint controllers including lawyers, bankers, accountants, auditors, insurers, management consultants and other intermediaries and business partners; and
  - HM Revenue & Customs and other authorities acting as processors or joint controllers.