# Privacy policy

### 1. Introduction

This website www.publieurope.com (the '**Site**') is brought to you by us, Publieurope Limited, a company incorporated in England (number 03720059) with its principal place of business at Ariel House, 74 A, Charlotte Street, WIT 4QJ ('we', 'our' or 'us' being interpreted accordingly). We take the privacy of our Site users very seriously. We ask that you read this Privacy Policy (the '**Policy**') carefully as it contains important information about how we will use personal information relating to you from which you can be identified that we collect or which you provide to us ('**Personal Data**').

## 2. Our legal obligations regarding your Personal Data

- 2.1 We collect and process your Personal Data in accordance with applicable laws that regulate data protection and privacy. This includes, without limitation, the UK General Data Protection Regulation and Data Protection Act 2018 together with other applicable laws that regulate the collection, processing and privacy of your Personal Data (together, '**Data Protection Law**').
- 2.2 Under Data Protection Law, Publieurope Limited is a 'controller' is respect of the Personal Data that we collect about you or which you provide to us (that is, the company who is responsible for, and determines the purposes for which we use your Personal Data).

## 3. Changes to this Privacy Policy

From time to time, we may change the way we use your Personal Data and amend this Policy. Please check that you have seen the latest version.

#### 4. Personal Data we may collect about you

We may collect Personal Data about you such as your name, contact details including office, phone and e-mail address, professional position and responsibilities, employer name and sector, your marketing preferences, and any other Personal Data that you may provide to us from time to time.

### 5. How your Personal Data is collected

- 5.1 We collect Personal Data about you in various ways as follows:
  - (a) when you visit or submit information to our Site
  - (b) when you sign up to receive newsletters or complete any online forms, questionnaires or surveys that we provide;
  - (c) when you otherwise submit Personal Data to us in the course of your/your employer's contractual relationship with us; and
  - (d) when you contact us with an enquiry or complaint or otherwise regarding an issue related to our services, and we keep a record of that correspondence.
- 5.2 In some cases, your Personal Data may be supplemented by information that we collect from public sources, including searches via search engines, sector-specific newsletters, public registers, social media and your employer's website. This is used for the purpose of confirming your current professional position.

#### 6. How we use your Personal Data

We use the Personal Data we collect to:

- (a) identify your/your employer's or organisation's requirements, to deliver services and information
- (b) to promote other services we provide which may be of interest to you, your employer and/or you organisation, subject to applicable law;

- (c) to contact you for your views on our services and to notify you occasionally about important changes or developments to the Site or to our services;
- (d) to enforce and/or defend any of our legal claims or rights; and/or
- (e) for any other purpose required by applicable law, regulation, the order of any court or regulatory authority.

### 7. The lawful grounds on which we collect and process your Personal Data

We process your Personal Data for the above purposes relying on one or more of the following lawful grounds:

- (a) where you have freely provided your specific, informed and unambiguous consent for particular purposes (such as sending email marketing to you as an individual or when you sign up to receive newsletters);
- (b) where we agree to provide services to you, in order to take any pre-contract steps at your request and/or to perform our contractual obligations to you;
- (c) where we need to use your Personal Data for our legitimate interests of being able to market, provide and administer our services; to maintain business relationships in connection with these services; to generally manage our business; and to keep records of our activities. We will always seek to pursue these legitimate interests in a way that does not unduly infringe on your other legal rights and freedoms and, in particular, your right of privacy; and/or
- (d) where we need to collect, process or hold your Personal Data to comply with a legal obligation.

### 8. Information about other individuals

Please ensure that any Personal Data you supply to us which relates to third party individuals is provided to us with their knowledge of our proposed use of their personal data.

#### 9. Disclosure of your Personal Data

- 9.1 We may need to disclose your Personal Data to certain third party organisations who are handling that data only on our behalf and in accordance with our instructions under contract (called **'data processors'**) e.g. companies and/or organisations that act as our service providers (such as IT suppliers or data hosting companies) or professional advisers.
- 9.2 We will ensure that, where relevant, contractual safeguards are implemented to protect your Personal Data when we disclose it to third party data processors. For example, we will enter into data processing agreements with those data processors which have restrictions on the use of your Personal Data and obligations with respect to the security of your Personal Data.
- 9.3 We may also disclose your Personal Data to other companies within our group companies and with the Mediaset Group (also known as Gruppo Mediaset).
- 9.4 Other than as described above, we will treat your Personal Data as private and will not disclose your Personal Data to third parties without you knowing about it. This is subject to exceptions under Data Protection Law such as where we need to disclose Personal Data in connection with legal proceedings or where we are legally required to do so and cannot tell you.
- 9.5 In all cases we always aim to ensure that your Personal Data is only used by third parties for lawful purposes and in compliance applicable Data Protection Law.

#### 10. Keeping your Personal Data secure

10.1 We employ appropriate technical and organisational security measures to protect your Personal Data from being accessed by unauthorised persons and against unlawful processing, accidental loss, destruction and damage.

10.2 We also endeavour to take all reasonable steps to protect Personal Data from external threats such as malicious software or hacking. However, please be aware that there are always inherent risks in sending information by public networks or using public computers and we cannot 100% guarantee the security of all data sent to us (including Personal Data).

## 11. How long we retain your Personal Data for

- 11.1 We only retain Personal Data identifying you for as long as you have a relationship with us (directly or through your employer or organisation) and thereafter as necessary to perform or observe our obligations to you or your organisation or to enforce or defend contract claims or as is required by applicable law.
- 11.2 We have a data retention policy that sets out the different periods we retain data for in respect of relevant purposes in accordance with our duties under Data Protection Law. The criteria we use for determining these retention periods is based on various legislative requirements, the purpose for which we hold data, and guidance issued by relevant regulatory authorities including but not limited to the UK Information Commissioner's Office (ICO).
- 11.3 Personal Data we no longer need is securely disposed of and/or anonymised so you can no longer be identified from it.

## 12. International transfers

We do not transfer any of your Personal Data outside the United Kingdom or European Union.

#### 13. Use of cookies

- 13.1 We use cookies or similar tracking technologies on this Site. A 'cookie' is a small text file which may be placed onto your device when you access a website in order to distinguish you from other users.
- 13.2 You are asked to consent to the use of such technologies on your device when you first access our website. For more information on the types of cookies and tracker technologies that we use on our Site, what they do and how to update your cookie or tracker preferences, please see our <u>Cookie Policy</u>.
- 13.3 Where you access any third party websites or services through links appearing on this Site, please note that the owners or operators of those third party websites or services will handle your Personal Data and use cookies or other tracking technologies in accordance with their own privacy policy or cookie policy, which you are recommended to check. We have no responsibility for how those third parties may choose to process your Personal Data.

# 14. Your Personal Data rights

- 14.1 Under Data Protection Law you also have the following rights, which are exercisable by making a request to us in writing:
  - (a) that we correct Personal Data that we hold about you which is inaccurate or incomplete;
  - (b) that we erase your Personal Data without undue delay if we no longer need to hold or process it;
  - (c) to object to any automated processing (if applicable) that we carry out in relation to your Personal Data, for example if we conduct any automated credit scoring;
  - (d) to object to our use of your Personal Data for direct marketing;
  - (e) to object and/or to restrict the use of your Personal Data for purpose other than those set out above unless we have a legitimate reason for continuing to use it; or
  - (f) that we transfer Personal Data to another party where the Personal Data has been collected with your consent or is being used to perform contact with you and is being carried out by automated means.

- 14.2 All of these requests may be forwarded on to a third party data processor who is involved in the processing of your Personal Data on our behalf.
- 14.3 If you would like to exercise any of the rights set out above, please contact us at the address below. We may ask for further information in order to verify your identity or clarify your request.
- 14.4 If you make a request and are not satisfied with our response, or believe that we are illegally processing your Personal Data, you have the right to complain to the Information Commissioner's Office (ICO) see https://ico.org.uk/concerns.

## 15. Our contact details

We welcome your feedback and questions. If you wish to contact us, please send an email to infolondon@publieurope.com or you can write to us at Ariel House, 74A Charlotte Street, London W1T 4QJ. Tel: +44 (0)207 927 9800.

## This Policy was last updated on 14 December 2021