

Privacy Notice

Contents

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data and keep it safe.

1. Legal Processing

Data protection law states there are several legal reasons why a company may collect and process personal data.

Contract – We will process your personal data to fulfil an order, deliver a service and essentially comply with our contractual obligations.

Legal Compliance – If the law or government requires us to, we may need to collect and process your data. An example might be passing on details of fraud to law enforcement.

Legitimate Interest – We require personal data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business. This does not impact your freedom or rights. Examples might be using your postal or email details to send direct marketing information on content, products and services that we think might interest you with the aim of raising awareness of our business with yours and you, as an employee of that business. We may also use your browsing or purchase history to send you or make available personalised offers.

2. When do we collect, add to or amend your personal data?

- When you visit our website or speak us on the phone.
- When you purchase services or enter into negotiations to do so.
- When you engage with us on social media.
- When you contact us by email or other means.
- When you book any kind of appointment with us, for example a meeting to discuss a brief or an opportunity.
- When you choose to complete any surveys we send you.
- When you choose to sign up to receive our blogs or eBooks.

- When you've given a third-party permission to share with us the information they hold about you.
- We may collect data from publicly-available sources where you have given your consent for them to share information publicly, such as online directories or LinkedIn.

3. What sort of personal data do we collect?

- Contact details for the company you work for such as email address and phone number.
- Details of your interactions with us through phone contact, email or online.
- Details of your visits to our websites, and which site you came from to ours.
- Information gathered by the use of cookies in your web browser.
- To deliver the best possible web experience, we may collect technical information about your internet connection and browser as well as the country and telephone code where your computer is located, the web pages viewed during your visit, the advertisements you clicked on, and any search terms you entered.
- Your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback.

4. How and why do we use your personal data?

We want to give you the best possible and most relevant experience. One way to achieve that is to get the richest picture we can of who you are by combining the data we have about you. We then use this to offer you content and services that are most likely to interest you.

The data privacy law allows this as part of our legitimate interest in understanding our existing potential customers and in order to provide the highest levels of service.

Of course, if you wish to change how we use your data, **you are free to opt out of hearing from us at any time** and you'll find details in the 'What are my rights?' section below.

Remember, if you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide the best experience.

Here's how we'll use your personal data and why:

- To process any negotiations or orders via our own account management team. If we don't collect your personal data during negotiations or ordering, we won't be able to process your order and comply with our legal obligations. We would keep your details for a reasonable period afterwards in order to fulfil our contractual obligations.

- To respond to your queries. Handling the information you send us enables us to respond. We may also keep a record of these to inform any future communication with us and to demonstrate how we communicated with you throughout. We do this on the basis of our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience.
- To protect our business and yours from fraud and other illegal activities. We'll also monitor your browsing activity to quickly identify and resolve any problems and protect the integrity of our website. We'll do all of this as part of our legitimate interest.
- To market our product and services to you. We will use your personal data, preferences and details of your transactions to send you relevant, personalised communications by post or email in relation to updates, content, offers, services and products and to keep you informed about relevant content, tailored offers, discounts, promotions, events and so on.
- We market on the basis of legitimate interest and in ways which might reasonably be expected as part of running our business. This does not impact your freedom or rights. Our marketing will follow best practice laid out by the ICO when dealing with corporate subscribers under the PECR.
- To send you communications required by law or which are necessary to inform you about our changes to the services we provide you. For example, updates to this Privacy Notice, marketing data misuse issues, and legally required information relating to your orders. These service messages will not include any promotional content and do not require prior consent when sent by email or text message. If we do not use your personal data for these purposes, we would be unable to comply with our legal obligations.
- To develop, test and improve the systems, services and products we provide to you. We'll do this on the basis of our legitimate business interests.
- To comply with our contractual or legal obligations to share data with law enforcement.
- To send you survey and feedback requests to help improve our services. These messages will not include any promotional content and do not require prior consent

when sent by email or text message. We have a legitimate interest to do so as this helps make our products or services more relevant to you.

You are free to opt out of hearing from us at any time.

5. How is personal data protected?

All data is treated with the utmost care and we take all appropriate steps to protect it.

We secure access to our website and apps using 'https' technology.

Access to all personal data is password-protected, and sensitive data is secured by SSL encryption.

We regularly monitor our system to identify ways to further strengthen security.

6. Website

What specific information is obtained?

Our website does not collect specific, detailed information about you as a visitor to our site. Where information is gathered, we will inform you of this along with the explanation of why it is required. This information will be for purposes such as responding to an enquiry made or signing up to receive our blog and we will ask for this information in order for us to get in touch and provide the relevant information which has been requested by you.

What information is retained?

Cookies and tracking software may be used on a temporary basis and will expire when the site has been left. This is for website improvement. Google Analytics is also used to help us improve and update our website experience. Information is not shared with anyone. By using the website, you are consenting to the use of cookies to retain session information for the purposes listed above. This information is held in your web browser and is removed at the end of your session. The personal information we collect and hold via tracking software is the following: –

- Browser used (Bing, Chrome, Internet Explorer etc.)
- Location (based on IP address)
- Gender
- Age group
- Site searches
- Device(s) used
- Frequency on site
- Session duration (time spent on the site)
- Page(s) visited
- Page session duration (time spent on specific page)
- Web surfing behaviour

We currently use the following companies that may process your personal data through website usage. Facebook, Twitter, LinkedIn, Google, HubSpot, SharpSpring, Instiller.

Our Details

If you need to contact us then please find the relevant details on our website contact page [here](#).

7. Customers / Clients / Enquirers

We hold information about customers/clients/enquirers as necessary for us to conduct our business activities.

What personal information is held?

The personal information we collect and hold is the following: –

- Full Name
- Company Name
- Company Address
- Company Website Address
- Email Address
- Phone Number
- Initial Requirement

This information may be linked together with what has already been gathered (as stated in the “what information is retained?” section) via Tracking Software.

How is this information gathered?

We gather this information through third-party sales team partners, through lead generation forms on our website and tracking software as mentioned in the “what information is retained?” section, as well as over the phone or email when relevant.

How long will the data be kept for?

For a reasonable period of time after you have stopped being an active customer, we may continue to contact you with information relating to our products and services. We deem a reasonable period of time to be three years after an order has been completed, or a relevant license period has expired. After this time, the data we hold will either be deleted, anonymised or retained providing you have asked us to do so.

Who will the data be passed to?

This information will not be passed on to anyone other than authorised employees of Frontroom and relevant processors, for example a company managing marketing on behalf of Frontroom.

Additionally, if a legal matter were to arise, then we may need to provide this information for those purposes.

- In this instance, we provide only the information required to perform the service
- The data will only be used for that exact purpose
- Partners are required to protect and respect your privacy
- If we stop using a partner's service, your data will be deleted or rendered anonymous.

Examples of third parties we work with are:

- Direct marketing companies who help us manage electronic communications and telemarketing
- Google/Facebook/LinkedIn to show products that might interest you. This is based on consent or your acceptance of cookies on our website.
- Data Insight companies to ensure your details are up to date and accurate.
- IT Companies who support our website and business systems

What is the reason for holding/using the information held?

While you are a customer of Frontroom, the basis for processing your data is 'contract'. When you are not or no longer an active customer of Frontroom, the basis is 'legitimate interest' as we would like you to order products/services from us.

We may use your details for the purpose of creating a profile to gauge decision making and for direct marketing purposes. For example, using information held, we may create profiles based on the following: –

- Email Address
- Telephone Number
- Geographic Location
- Job Title/Job Role

8. Data Subject Rights (Subject Access Request, Erasure, Rectification)

- You have the right to ask for information we hold for you (Subject Access Request) which will be provided free of charge and if requested, can be presented in a spreadsheet based format.
- The data we hold will be corrected when we are notified of errors. Information we hold for you will no longer be processed if requested to do so.
- Information we hold for you will be deleted if you request us to do so. It is possible we may contact you at a later date as we will hold no record of you.
- You have the right to withdraw consent at any time.
- You have the right to stop the use of your personal data for direct marketing through selected or all channels.
- You have the right to stop processing your personal data under legitimate interest for individual reasons. We will comply unless we believe there is a legitimate overriding reason to continue processing.
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9. To stop the use of personal data for direct marketing:

Click the Unsubscribe Link in any email communication that we send you. We will then stop all emails.

Write to:
Compliance Officer

10. Our Details

If you need to contact us then please find the relevant details on our contact page.

11. To contact the regulator, please see below:s

0303 123 113 or go to www.ico.org.uk