

# Circle Squared Informatics Ltd Privacy Policy

## Introduction

This privacy notice is for visitors to our websites, apps and other digital platforms. It sets out how we use personal data that we hold about you and gives information on how to exercise your legal rights. In this notice 'we' and 'our' means Circle Squared Informatics Limited which operates this platform.

Personal data can include:

- Your name, address, year of birth or title
- Debit or credit card details
- Information about your devices, such as IP address
- How you browse our websites

An important part of the Voice Your Values Concept is the feeding back your purchase decisions to companies. In this case your data is anonymised.

## What data do we process?

If you register for an account on our website or app you will need to provide us with your full name, email address.

If you plan to comment on our website you will need to provide us with a commenting name.

If you are subscribing to one of our paid-for products, in addition to your name, email address and year of birth, you will also need to provide your billing address and payment card information.

If you contact our Customer Services team, we will need your name and contact information as well as full details of your query.

We collect data about our website's/app visitors using technology such as cookies, device IDs, IP addresses and location data. This can include information about your location, the type of device you are using and your online browsing history.

We may check our database of registered users against the information they held on 3<sup>rd</sup> party systems to see if there are any matched individuals. If there is a match, we can collect and store some of this additional information (which may include statements about your lifestyle and interests) in our database and use it to further enhance our understanding of the types of products and services you might be interested in.

We may also match your cookie data with this third party data, and aggregate this data into interest-based segments or profiles which we use to develop our products, or serve you more relevant advertising. Sometimes we share these segments with other publishers so they can show you advertising on their websites. We can also pool these segments with those from other publishers so that advertisements can be shown across multiple websites to readers whilst limiting the number of times you see the ads.

We can also access information from social media activity such as when you 'like' the website, share content or follow us on Twitter. When you sign in to the website using social media you grant permission to the social network to share some of your details with us. Depending on the network this will include basic account information such as name, email address, date of birth and any other details you choose to share according to your particular social media account settings.

### **What might we use this data for?**

- \* Verifying your identity (for example when you return to the website and have already logged in).
- \* Personalising the any advertising you see on the website so that it is more relevant to you. For more information on how we use your cookie data please see our Cookie Notice.
- \* Improving the design and style of the website.
- \* Informing you about products, services or promotional offers that you might find interesting if you have chosen to receive these type of communications.

- \* Sending you service messages about your subscription or account registration, for example if you have clicked a password reset link. This could be by email, overlay on the website or push notification.
- \* Dealing with, and responding to you about, a comment you have submitted for or on our message boards, blogs and other such user generated content facilities.
- \* Enabling you to share our content with others using social media or email.
- \* Communicating (and personalising such communication) with you through our newsletters, but only those you have consented to receive.
- \* Administering competitions and informing you if you have been successful in any competitions or promotions.
- \* Compiling customer reviews.
- \* Conducting market research.
- \* Sending a product to your home address.
- \* Dealing with any query or complaint you submit to our customer services team. Only provide sensitive data (such as information about your health, race or religion) if you are happy to consent to our using it to manage your enquiry.
- \* Sending you push notifications from our apps.

We also log and use information about any service errors or interruptions that you have experienced in order to help us create fixes and to make technical improvements to our website

### **How we may contact you**

From time to time we may contact you by email or push notification to give you service information.

If we have your permission we may also send you newsletters or emails about our events, subscription benefits or offers.

Occasionally we may ask you if you would like to participate in market research, or respond to you if you have made a complaint or have logged a query.

## **What is our legal basis for processing personal data?**

Consent.

We will only use your personal data for advertising and marketing, personalisation of content and services, advertising analytical purposes and to track eCommerce purchases if we have your specific consent to do so. This includes the use of data provided by you and our partners for profiling purposes in order to generate revenue from you so we can improve our products and services.

If you have given us consent to send you specific newsletters, you can unsubscribe from these at any time

Legitimate interests.

The legitimate interest pursued by us to analyse our website traffic in order to maintain the service, for example monitoring successful page loads or error messages.

Performance of a contract

When you purchase a subscription or buy another product or service from us, we will need to process your details in order to supply the item to you (for example, to deliver a product to your home, we would need to use your name and address).

## **How can you access and update your personal information?**

If you are a registered user or subscriber, you can update your personal information by signing in to your account page or through your social network provider. In all other cases, please contact customer services.

You can ask for a copy of the personal information we may hold about you, or for your data to be deleted via customer services.

## **How long do we keep your personal information for?**

We will keep your information only for as long as it is relevant and useful for the purpose for which it was originally collected.

A record of a customer service query is retained for at least three years from the date it was submitted to us.

We retain cookie data and corresponding third party data for 13 months from when it was collected from your device.

We may need to retain your data for a longer period if there is a legal claim or if we are required to so by any regulation.

### **Who will we share your personal information with?**

Advertisers and advertising networks sometimes require data to select and serve relevant advertisements to you and others. We may provide them with aggregate cookie information about our users with certain attributes (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in the UK who are interested in travel).

We reserve the right to disclose your personal information to comply with applicable laws and government or regulatory bodies' lawful requests for information.

Your personal details may be shared with third party organisations we have contracted to provide services to us which include processing data. For example, to send you the emails you have signed up for. We will only use companies who can provide adequate safeguards to ensure your data is stored and handled securely.

We may also have to release information because of a legal requirement on us or pursuant to a court order.

We may transfer, sell or assign any of the information described in this Privacy Notice to third parties as a result of a sale, merger, consolidation, change of control, transfer of assets or reorganisation of our business.

### **Will your data be sent overseas?**

As you will know, the internet does not recognise national boundaries. Services on the web are accessible globally so collection and transmission of personal data is not always confined to one country.

You should be aware that by using the website and those of our partners or any website we link through to, your personal data may be processed in or transferred to other countries, the USA for example, and you agree to your personal data being transferred or processed in this way.

Your personal data will only be stored or transferred within the UK, EU or US under the EU-US Privacy Shield, or using other safeguards that have been approved by the relevant regulatory body.

### **Your rights:**

**Right of access** – you have the right to request a copy of the data that we hold about you.

**Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.

**Right to be forgotten** – you can ask for the data we hold about you to be erased from our records.

**Right to restriction of processing** – you can ask for us to restrict the way we process your data.

**Right of portability** – you have the right to have the data we hold about you transferred to another organisation.

**Right to object** – you have the right to object to our processing your data where we are relying on a legitimate interest in order to process it.

**Right to withdraw your consent** – you have the right to withdraw your consent at any time.

Please note that these rights are not absolute and certain exemptions apply.

### **Exercising your rights, asking questions and raising concerns:**

Please contact [info@circlesquared.com](mailto:info@circlesquared.com)

### **Supervisory authority contact details**

0303 123 1113

Contact Name: Information Commissioner's Office

<https://ico.org.uk/concerns/>

