

ARC DATA PRIVACY POLICY

Welcome to Arc Data Limited's privacy policy.

Arc Data Limited, and if applicable, each of its subsidiary companies (together “we”, “our” and “us”) are committed to protecting and respecting your privacy. This policy outlines the basis on which any personal data we collect from you, or that you provide to us, will be processed by us and tell you about your privacy rights and how the law protects you. Please note that all data captured will be used and held in accordance with the requirements of the Data Protection Act 2018 and General Data Protection Regulation ((EU) 2016/679) (UK GDPR).

About this privacy policy

This policy sets out how we will use and share the information that you give us. This privacy policy relates to personal data collected by us via the following means, together being our “Sources”:

- Our website(s);
- Email correspondence;
- Telephone calls;
- Paper communications;
- Social media;
- Visiting our offices;
- Enquiring about, or buying products or services from us;
- Providing products or services to us; or
- Trade events such as conferences or exhibitions.

You should be aware that if you access third party websites using links provided on our websites, these websites are outside our control and have their own privacy policies governing the use of personal data and we do not accept any responsibility or liability for these policies.

1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY POLICY

This privacy policy aims to give you information on how we collect and process your personal data through your use of our Sources, including any data you may provide through our Sources when you sign up to our newsletter, purchase a product or service or take part in a competition.

Our Sources are not intended for children, and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

CONTROLLER

Arc Data Limited is the data controller and responsible for your personal data.

We have appointed Suzanne Lewis as our Data Privacy Manager, Arc Data Limited 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 rights, please contact the Data Privacy Manager using the details set out below.

CONTACT DETAILS

If you have any requests concerning your personal data or any queries with regard to how we handle your data, this privacy policy or our privacy practices, please contact our Data Privacy Manager in one of the following ways:

Full name of legal entity: Suzanne Lewis

Email address: Suzanne@arc-data.co.uk

Postal address: Arc Data Limited, 163 City Road, EC1V 1NR.

Telephone number: 020 3475 6820

Company Registration Number: 11615386

Information Commissioners Office registration number is ZA471760.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (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 THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy policy under regular review. This version was last updated on 6 April 2022. Historic versions can be obtained by contacting us.

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

THIRD-PARTY LINKS

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

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).

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

- **Identity Data** includes first name, last name, username or similar identifier, marital status, title, age .
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes your login data, browser type and version, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, donations made by you, your interests and hobbies, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). We will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

Arc Data Limited is a marketing agency which helps commercial and non-profit organisation with their data. This includes helping them to communicate and recruit new customers or donors and helping them improve their communications with existing customer and donors.

Arc Data Limited collects Business to Business (“B2B”) data from our customers and those prospects that we would like to work with in the future. The personal data we collect is limited to postal addresses, email addresses, telephone numbers and order histories that have taken place between our organisation and individuals within a business.

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

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - create an account on our website;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. [Please see our cookie policy <https://www.iubenda.com/privacy-policy/94874112/cookie-policy> for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:

Technical Data from the following parties:

(a) analytics providers such as Visitor Analytics based outside the UK;

(b) Identity and Contact Data from data brokers, aggregators or search information providers such as Happier Leads based inside the UK; and

(c) Happier Leads uses Cognism Ltd as its provided of Lead Contact Data. Please see Cognism’s website for more information about their processing of personal data at the following link: <https://www.cognism.com/privacy-policy>

Cognism Ltd is based in the UK and operates a proprietary database for contact information.

4. HOW WE USE YOUR PERSONAL DATA:

We will only use your personal data as allowed under applicable law. Most commonly, we will use your personal data in the following circumstances:

Consent – Where you have provided Arc Data Limited with specific consent to process your information. In such circumstances we shall provide you with news stories, marketing literature and promotional material promoting our services. At any point you can alter your permission preferences, or withdraw your consent, by contacting the Data Privacy Manager using the contact details above.

Contract – where processing is necessary for us to administer the pre-contract and contractual relationship between ourselves and our suppliers/customers/potential employees in connection with the performance of a contract.

Compliance with a legal obligation – For example where we are asked to submit information to the ICO or any regulatory bodies or government organisations.

Legitimate interests – 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. As a marketing agency we believe we have a commercial legitimate interest to communicate with individuals responsible for marketing, sales, fundraising communications or data analytics by post and telephone. We may also have a legitimate interest to communicate with you via email if you are an existing customer or have we have collected your email address as part of a transaction and we intend to market similar products or services to you.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and the legal basis upon which we rely. 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 upon to process your personal data where more than one ground has been set out in the table below.

Activity	Purpose of processing	Lawful basis
Registering to subscribe to our Newsletter.	Dealing with your enquiries or requests and providing relevant content to you.	Consent (Art 6.(1)(a)) – email Legitimate Interest (Art 6.(1)(f)) – Postal & Telephone.
Registering for an event	Dealing with your request to attend an event	Contract (Art 6.(1)(b))
Registering for an event	Internal accounting processes	Contract (Art 6.(1)(b))
	Providing you with information about our products and services	Consent (Art 6.(1)(a)) or /Legitimate interests (Art 6.(1)(f))

Making an enquiry or communicating with us through methods including but not limited to e-mail, telephone and written correspondence, Requesting any of our goods, services, downloads or other information	Dealing with your enquiries or requests Providing you with information about our products and services	Contract (Art 6.(1)(b)) Consent (Art 6.(1)(a)) or Legitimate interests (Art 6.(1)(f))Consent/Legitimate interests
Third Party Data Purchases Third Party Data Purchases	Dealing with an order/ reservation/booking your place Internal accounting processes Provide you with information about our products and services	Contract (Art 6.(1)(b))Contract Contract (Art 6.(1)(b))Contract Consent (Art 6.(1)(a)) or Legitimate interests (Art 6.(1)(f))Consent/Legitimate interests
Information generated by the work, service or relationship we may have with you	Business details, bank and financial details, communication and correspondence Provide you with information about our products and services	Contract (Art 6.(1)(b))Contract Consent (Art 6.(1)(a)) or Legitimate interests (Art 6.(1)(f))Consent/Legitimate interests
Information generated by visiting our website or engaging with us on social media:	IP addresses, social handles or usernames	Consent (Art 6.(1)(a))

Purpose of processing your personal data CACI mailable Ocean Database

Arc Data Limited is a reseller of CACI's mailable Ocean Database. The data we hold is limited to postal address and CACI's associated codes. The data is used to enable charities to send one-off fundraising letters to consumers. The lawful basis we are using for this activity is our legitimate interests (Art 6.(1)(f)), our legitimate interest being direct marketing.

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

PROMOTIONAL OFFERS FROM US

We would like to use your Identity, Contact, Technical, Usage and Profile data to send you details of products or services that we offer that we have identified as likely to be of interest to you. We will only send you information in line with the preferences you indicated when you provided the personal data.

You will receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing.

Arc Data Limited may purchase third party B2B marketing databases which include your personal data. Where such databases are purchased, we will ensure that you have given your consent to receive email communications or there is a legitimate basis for communications by post or telephone.

OPTING OUT

If at any point you would like to opt-out of receiving communications from us, or would like to change the channels (such as email or post) that we use to contact you, please follow the opt-out links on any marketing message sent to you.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may also share some of your personal data with sub-contractors who help us carry out the following tasks:

- marketing agencies who help us promote ourselves or deliver our services;
- cloud server providers and third-party analytics providers who help us store and analyse the data we hold and use;
- charities;
- mail order and financial service companies, printers, mailing houses, email service providers or other suppliers who help us to send our newsletters and communications;
- suppliers providing services to us to help us run our business;
- accountants that acting on our behalf; and
- debt collection agencies that help us collect unpaid or overdue monies owned to Arc Data Limited.

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.

6. INTERNATIONAL TRANSFERS

As part of our processing activities we ensure that your personal data is retained within the UK, unless your data is processed in connection with certain circumstances. We may send data for data cleansing in the United States of America. Although the U.S. is not subject to an adequacy regulation by the UK GDPR, we carry out our own due diligence and regularly review terms of the privacy policies of the companies involved to ensure compliance with data protection regulations.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

7. 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.

8. DATA RETENTION

We will keep your personal data in connection with the services/products you have bought from us for 7 years following the date of your most recent purchase. We need to retain this data for our own accounting purposes and for legal and tax purposes.

In terms of personal data we use for marketing, we will keep this data for as long as we are able to market to you and if you withdraw your consent or opt-out of marketing communications, we will keep your contact details only to ensure that we do not contact you again for marketing purposes.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

We may also 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.

Data subject's rights

You have rights under data protection laws in relation to your personal data. Please find out more about these rights below:

The right to be informed – you have the right to be told about the collection and use of the personal data we collect. This privacy policy sets out the purpose for which we process your personal data, how long we will keep your data, who we will share your data with. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-be-informed/>

Right of access – 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. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-of-access/>

Right to rectification – you have the right to 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. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-rectification/>

Right to erasure – this right, often referred to as the right to be forgotten allows you to ask us to erase 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. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-erasure/>

Right to restrict processing – you have the right to 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. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-restrict-processing/>

Right to data portability – you have the right to move, copy or transfer your personal data from one IT environment to another. This right applies to data that you have provided to us and that we are processing on the legal basis of consent or in the performance of a contract and that processing is by automated means. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-data-portability/>

Right to object – you have the right to object to our processing of your personal data based on: (i) legitimate interests, or for the performance of a task in the public interests/exercise of official authority (including profiling); (ii) direct marketing (including profiling); and (iii) for purposes of scientific/historical research and statistics.

- i. Legitimate interests/legal task – your objection should be based on your particular situation. We can continue to process the data if we can demonstrate compelling legitimate grounds which override your interests.
- ii. Direct marketing – you have an absolute right to ask us to stop processing for the purposes of direct marketing. We will action your request as soon as possible.
- iii. Scientific/historical research and statistics – your objection should be based on your particular situation. If we are conducting research where the processing is necessary for the performance of a public task, we can refuse to comply with your objection.

If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-object/>

Rights relating to automated decision-making including profiling – you have the right in respect of automated decision making, including profiling. Where we carry out solely automated decision making, including profiling, which has legal or similarly significant effects on you, we can only do this if it is in connection with a contract with you, we have a right under law or you have provided your explicit consent. We will tell you if this happens and tell you how you can request human intervention or challenge the decision. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/rights-related-to-automated-decision-making-including-profiling/>

If you wish to exercise any of the rights set out above, please contact the Data Privacy Manager at the contact details above. We will need to confirm your identity before we can consider your request so, if you wish to exercise any of these rights, we will need proof of name & address in the form of a passport, driving licence and recent utility bill or bank statement (dated within the last three months).

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 could 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 could 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.

STATUTORY/CONTRACTUAL REQUIREMENT TO PROVIDE PERSONAL DATA

The personal data that you provide to us relating to any orders processed including any banking information, contact details is necessary for us to carry out the contract you have entered into with us or for us to perform our obligations under Statute. Failure to provide such information will result in us being unable to carry out the purchases required with your business.