

## **Privacy policy**

## **Definitions and interpretation**

1. In this privacy policy, the following definitions are used:

Data	collectively all information that you submit to 360 Media Group Ltd via the Website. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws;
Data Protection Laws	any applicable law relating to the processing of personal Data, including but not limited to the GDPR, and any national implementing and supplementary laws, regulations, and secondary legislation: Directive 96/46/EC;
GDPR	the UK General Data Protection Regulation: (EU) 2016/679;
360 Media Group Ltd, we or us	360 Media Group Ltd consists of, 360 Media Group Ltd a company incorporated in England and Wales with registered number 11925065 whose registered office is at Ground Floor, 2 Woodberry Grove, London, N12 0DR;
	FLEET FUTURISTS with registered number 13144955 FLEET FUTURISTS LTD, The Grey House, 3 Broad Street, Stamford, Lincs, PE9 1PG. Services provided through our partnership with Levo with registered number 13884806 whose registered office is Levo Group Ltd, Woodstock Lodge, Woodstock, Oxfordshire, OX20 1PP
User or you	any third party that accesses the Website and is not either (i) employed by 360 Media Group Ltd and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to 360 Media Group Ltd and accessing the Website in connection with the provision of such services;
Website	the website that you are currently using, www.360mediagroupltd.com, and any sub-domains of this site unless expressly excluded by their own terms and conditions.

This privacy policy applies between you, the user of this Website and related services and 360 Media Group Ltd, the owner and provider of this Website and related services.

360 Media Group Ltd takes the privacy of your information very seriously. We collect your personal data because it helps us to understand your needs and guides the way in which we interact and communicate with you about our products and services now and in the future.

We have strict policies and procedures in place to protect your data when you send it to us; when we process it in order to provide you with the services you have requested; or where you have given us permission to do so, to send you information that we think you'll find interesting, and thereafter we store your data on our secure servers.

This privacy policy applies to our use of any and all Data collected by us or provided by you in relation to your use of the website and any related services used. We are registered with the Information Commissioner's Office, the regulator of General Data Protection Regulations (GDPR) and other relevant legislation and abide by its requirements. This privacy policy should be read alongside, and in addition to, our Terms and Conditions, which can be found at: https://www.360mediagroupltd.com/gdpr.



## Please read this privacy policy carefully.

360 Media Group Ltd rely upon four lawful ways to collect, use, store, and process personal data. Consent, Contractual, Legitimate Interests and Legal Obligations. We outline each of these in the privacy policy.

- 2. In this privacy policy, unless the context requires a different interpretation:
  - 1. the singular includes the plural and vice versa;
  - 2. references to sub-clauses, clauses, schedules, or appendices are to sub-clauses, clauses, schedules, or appendices of this privacy policy;
  - 3. a reference to a person includes firms, companies, government entities, trusts, and partnerships;
  - 4. "including" is understood to mean "including without limitation";
  - 5. reference to any statutory provision includes any modification or amendment of it;
  - 6. the headings and sub-headings do not form part of this privacy policy.

#### Scope of this privacy policy

- 3. This privacy policy applies only to the actions of 360 Media Group Ltd and Users with respect to this Website and related services. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.
- 4. For purposes of the applicable Data Protection Laws, 360 Media Group Ltd is the "data controller". This means that 360 Media Group Ltd determines the purposes for which, and the manner in which, your Data is processed.

# **Data collected**

- 5. We may collect the following Data, which includes personal Data, from you:
  - 1. name;
  - 2. profession;
  - 3. business contact information such as email addresses and telephone numbers;
  - 4. industry sector & fleet size of the organisation that you are employed by;
  - 5. payment information related to subscription services;
  - 6. content, quotes, or testimonials provided by you (unless stated confidential);
  - 7. photography at public events.

in each case, in accordance with this privacy policy.

#### How we collect Data

- 6. We collect Data in the following ways:
  - 1. data is given to us by you;
  - 2. data is received from other sources; and
  - 3. data is collected automatically.



## Data that is given to us by you

- 7. 360 Media Group Ltd will collect your Data in a number of ways, for example:
  - 1. when you contact us through the Website, by telephone, post, e-mail or through any other means;
  - 2. when you register with us and set up an account to receive our products/services;
  - 3. when you complete surveys that we use for research purposes (although you are not obliged to respond to them);
  - 4. when you elect to receive marketing communications from us;
  - 5. when you register for specific events, training or download premium content;
  - 6. when you subscribe;
  - 7. when you contribute content or comment to editorial.

in each case, in accordance with this privacy policy.

### Data that is received from publicly available third-party sources

- 8. We may receive Data about you from the following publicly available third-party sources:
  - 1. To perform **contractual obligations** to you, for example we and our external partners process your information to deliver a service that you have requested, for example for events this may be to process catering requirements or seating arrangements.
  - 2. Where data supplied by you that has been omitted or not accurately submitted, we may use LinkedIn data or other publicly available sources of information to verify data on your organisation, for example to confirm industry sector and/or fleet size details.

## Data that is collected automatically

- 9. To the extent that you access the Website, we will collect your Data automatically, for example:
  - we automatically collect some information about your visit to the Website. This
    information helps us to make improvements to Website content and navigation, and
    includes your IP address, the date, times, and frequency with which you access the
    Website and the way you use and interact with its content.

#### Our use of Data

- 10. Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Website. Specifically, Data may be used by us for the following reasons:
  - 1. internal record keeping;
  - 2. improvement of our products and services;
  - 3. transmission by email of marketing materials that may be of interest to you;
  - 4. contact for market research purposes which may be done using email, telephone, fax, or mail. Such information may be used to customise or update the Website;



5. location details (of your organisation) may be used to help us plan future events.

in each case, in accordance with this privacy policy.

- 11. We may use your Data for the above purposes if we deem it necessary to do so for our **legitimate interests**. If you are not satisfied with this, you have the right to object in certain circumstances (see the section headed "Your rights" below).
- 12. We may use your data to comply with our **legal obligations** when we use your information to protect our rights or the rights of others and when we share your information with other parties by law or as necessary to protect our rights. For example, when processing subscription payment for tax or reporting reasons.
- 13. For the delivery of direct marketing to you via e-mail, we will need your **consent**, whether via an opt-in or soft-opt-in:
  - soft opt-in consent is a specific type of consent which applies when you have previously engaged with us (for example, you contact us to ask us for more details about a particular product/service, and we are marketing similar products/services). Under "soft opt-in" consent, we will take your consent as given unless you opt-out.
  - 2. for other types of e-marketing, we are required to obtain your explicit consent; that is, you need to take positive and affirmative action when consenting by, for example, checking a tick box that we will provide.
  - 3. if you are not satisfied about our approach to marketing, you have the right to withdraw consent at any time. To find out how to withdraw your consent, see the section headed "Your rights" below.
- 14. When you register with us and set up an account to receive our services, the legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

## Who we share Data with?

- 15. We may share your Data with the following groups of people to pursue our legitimate interests when we use your information to provide you with the services to communicate with you:
  - 1. any of our group companies or affiliates for the purposes of analysis;
  - 2. our employees, agents and/or professional advisors the data is shared with senior management for analysis purposes;
  - 3. our marketing teams to communicate events, relevant content, offers and tools that we think you may be interested in hearing about. You can withdraw your consent at any time by contacting dataprotectionofficer@360informationservices.com;
  - 4. third-party service providers who provide services to us which require the processing of personal data for the purposes of communications and delivery of best practice advice and related services, as outlined in our terms & conditions for events, webinars, and premium content;
  - 5. we share data with events partners to ensure that the activity is specific to the audience and the event suppliers;



- sponsors and partners of our events and webinars who may contact you from timeto-time with carefully selected offers and promotions from our limited network. These event services are usually subsidised with support from our partners. This is clearly stipulated in our terms and conditions, and you can opt-out or unsubscribe of communications at any time;
- 7. carefully selected partners who subsidise premium content that we have provided and/or intend to provide in the future, (such as a free best practice guide in association with) contact may happen on related products and services. This is clearly stipulated in our terms and conditions, and you can opt-out or unsubscribe of communications at any time;
- 8. it is customary practice to share the delegate list with the event venue for health and safety purposes;
- 9. external providers that process payments for subscriptions, such as Stripe;
- 10. should you enter any competitions, the competition partner may have access to your data, this is clearly identifiable, and you can withdraw your consent at any time; in each case, in accordance with this privacy policy.

## Cookies

In each case, in accordance with this privacy policy, we obtain your consent in relation to Cookies and Similar Technologies when we are required to do so by law. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

- 1. You can find a list of Cookies that we use in the Cookies Schedule;
- 2. You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies, but this can be changed;
- 3. You can choose to delete Cookies at any time. However, you may lose information that enables you to access the Website more quickly;
- 4. It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings;
- 5. For more information about Cookies please refer to aboutcookies.org

## **Keeping Data secure**

- 16. We will use technical and organisational measures to safeguard your Data, for example:
  - 1. access to your account is controlled by a password and a user name unique to you.
  - 2. we store your Data on secure servers.
- 17. Technical and organisational measures include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your Data, please let us know immediately by contacting us via this e-mail address: <a href="mailto:dataprotectionofficer@360informationservices.com">dataprotectionofficer@360informationservices.com</a>

www.360mediagroupltd.com



18. If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses, and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

# **Data retention**

- 19. Unless a longer retention period is required or permitted by law, we will only hold your Data on our systems for the period necessary to fulfil the purposes outlined in this privacy policy or until you request that the Data be deleted.
- 20. Even if we delete your Data, it may persist on backup or archival media for legal, tax or regulatory purposes.

## Your rights

- 21. You have the following rights in relation to your Data:
  - Right to access the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update, or delete such information. If we provide you with access to the information we hold about you, we will not charge you for this, unless your request is "manifestly unfounded or excessive." Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.
  - 2. **Right to correct** the right to have your Data rectified if it is inaccurate or incomplete.
  - 3. **Right to erase** the right to request that we delete or remove your Data from our systems.
  - 4. **Right to restrict our use of your Data** the right to "block" us from using your Data or limit the way in which we can use it.
  - 5. **Right to data portability** the right to request that we move, copy, or transfer your Data.
  - 6. **Right to object** the right to object to our use of your Data including where we use it for our legitimate interests.
- 22. To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us via this e-mail address: dataprotectionofficer@360informationservices.com
- 23. If you are not satisfied with the way a complaint you make in relation to your Data is handled by us, you may be able to refer your complaint to the relevant data protection authority. For the UK, this is the Information Commissioner's Office (ICO). The ICO's contact details can be found on their website at https://ico.org.uk/.
- 24. It is important that the Data we hold about you is accurate and current. Please keep us informed if your Data changes during the period for which we hold it.



#### Links to other websites

25. This Website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

#### Changes of business ownership and control

- 26. 360 Media Group Ltd may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of 360 Media Group Ltd. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purposes for which it was originally supplied to us.
- 27. We may also disclose Data to a prospective purchaser of our business or any part of it.
- 28. In the above instances, we will take steps with the aim of ensuring your privacy is protected.

#### General

- 29. You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.
- 30. If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal, or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.
- 31. Unless otherwise agreed, no delay, act, or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.
- 32. This Agreement will be governed by and interpreted according to the law of England and Wales. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.

## Changes to this privacy policy

33. 360 Media Group Ltd reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website, and you are deemed to have accepted the terms of the privacy policy on your first use of the Website following the alterations.

You may contact 360 Media Group Ltd by email at dataprotectionofficer@360informationservices.com

#### Attribution

34. This privacy policy was created using a document from <u>Rocket</u> <u>Lawyer</u> (https://www.rocketlawyer.com/gb/en).

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