

MPULL Privacy Policy

Last updated: 18 April 2018

Definition of Terms

The GDPR (General Data Protection Regulation)

This is a new EU Regulation which will replace the 1995 EU Data Protection Directive (DPD). It is aimed at significantly enhancing the protection of the personal data of EU citizens and increase the obligations on organisations who collect or process personal data. Mostly, GDPR is an extension of the foundation laid by the 1995 Directive's requirements for data privacy and security, but it includes several new provisions to bolster the rights of data subjects and add harsher penalties for violations.

First-party Data

First-party data is data that a company collects about its own audience directly. This includes but is not limited to data that is collected from you when you visit our website, fill in contact forms, make purchases, post user content or reply to electronic communication.

Third-party Data

Third-party data is data that is collected by third parties: that is, external sources, platforms, software or applications that have no direct relationship with the person whose data is being collected.

Personal Data (or "Personally Identifiable Information")

Any information related to an identified/identifiable data subject. It may include, but is not limited to, your name, email address, telephone number, username or account ID, and other information that can personally identify you.

Non-Personal Data (or "Non-Personally Identifiable Information")

Any information that does not identify you as an individual. This may include, but is not limited to, information about your browser, your IP address, device ID, which website you came from, what advertisements you clicked on, and other information about your online activity that does not identify you as an individual.

Cookies

Cookies are files with small amounts of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your computer's hard drive.

Data Subject

A subject, normally a single individual, who comprises all personal data or personally identifiable information regarding that specific end user.

Controller

A company/organisation that collects people's personal data and makes decisions about what to do with it.

Processor

A company/organisation that helps a controller by "processing" data based on its instructions, but doesn't decide what to do with data.

Processing

Any operation or set of operations which is performed on personal data or on sets of personal data, by automated means or otherwise, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

About MPULL

MPULL ("us", "we", or "our") operates www.mpull.com (the "site" or "website"). This page aims to inform you of our policies regarding the collection, use and disclosure of Personal Information we receive from users of the site. By using the site, you agree to the collection and use of information in accordance with this policy.

MPULL is a South Africa based, globally-engaged digital marketing solutions agency that combines unique client journeys with cutting-edge inbound marketing strategies to bridge the gaps between sales, technology, strategy and creativity to deliver digital experiences that empower business and maximise results.

At MPULL we serve a range of clients across the globe, and as such, want to all our clients and prospective partners to know that we take their data security and privacy seriously. Thus, MPULL has implemented various measures to bring the company in line with GDPR guidelines. Not only is it best practice for digital marketing firms: it's the proper thing to do.

What user information is collected?

While using our site, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Such information may include: Personal Data including, but not limited to, your first name, last name, email address, company, job title, country, telephone number and Non-Personal Data, which includes but is not limited to information that does not identify you as an individual.

Non-Personal Data may include, but is not limited to, information about your browser, your IP address, and which website you came from. The information we collect may include log file information (including your IP address, browser type and version, and information regarding your use of our website).

How your data is collected and what your data is used for?

All personal data owned by MPULL is collected via HubSpot and associated HubSpot cookies.

All personal data directly collected, owned and processed by MPULL is only used to personalise communication with the end recipient, validation of the quality of business opportunities, marketing and sales communication and finally, for reporting purposes.

All personal data is collected by website contact forms, email communication, telephonic /verbal communication, or use of our website. Personal data is never bought or sold.

All non-personal anonymised data is collected through Google Analytics, Google Adwords, Facebook, LinkedIn and their associated cookies. In cases where no website forms have been completed with personal information HubSpot will track non-personal anonymous user website behaviour data.

MPULL does not control the collection of any third-party non-personal anonymised data, but may use this data in the course of reporting or remarketing. We cannot alter, access, change, edit or delete any of this information, nor can we reasonably be expected to alter, edit or delete this information in any way. The data collected under these respective platforms is subject to those organisations own privacy policies. For more information about these websites, their policies on data security and handling, and how they collect or store information, read their relevant privacy policies here:

- Google ([Privacy policy](#))
- FaceBook ([Privacy policy](#))
- LinkedIn ([Privacy policy](#))

Our policy on cookies

Like many sites, we use "cookies" to collect information. This website uses cookies to better the user's experience while visiting the website. Where applicable this website uses a cookie control system, allowing the user to give explicit permission or to deny the use of /saving of cookies on their computer / device. This is only with respect to the HubSpot and does not apply to third party marketing software or tools which collect non-personal anonymised data.

These HubSpot cookies can also track behaviour on our website or in relation to interactions with our emails, and associate this behaviour to an identifiable individual, provided that a user previously filled in a form with their personal details and still has the associated cookie on their browser. MPULL controls and process personalised data derived from these cookies.

MPULL also uses third-party software which makes use of cookies to assist with anonymised reporting as well as remarketing. Current 3rd party platforms can include:

- LinkedIn (Third-party cookies)
- Facebook (Third-party cookies)
- Google Analytics (First-party cookies)
- AdWords (Third-party cookies)

You can instruct your browser to refuse/ delete all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to experience personalised communication and interactions based on your use of our Site. See the settings for your browser below:

For Edge, [click here](#)

For Internet Explorer, [click here](#)

For Mozilla Firefox, [click here](#)

For Google Chrome, [click here](#)

For Safari, [click here](#)

Who will it be shared with?

Personalised data owned, controlled or processed by MPULL is only used by the business and is not sold. Data is not given or shown to any third party without prior consent. MPULL strives to respect your privacy and remain compliant with data regulation laws.

However, we may share you information with companies, organisations or individuals outside of MPULL when we have your express consent to do so, as may be obtained through opt-in measures. We may also share your information as is legally required by a recognised court official or order, police warrant, or other enforceable government request.

If MPULL is involved in a merger, acquisition or asset sale, we will continue to ensure the confidentiality of any personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

How we protect your personal data

Personalised data owned by MPULL is securely stored on HubSpot in the Cloud, and is fully protected by an exhaustive combination of tools and failsafes, including end in-transit encryption, advanced TLS (1.0, 1.1, and 1.2) protocols, and 2,048-bit keys. For more information about how Hubspot physically and digitally secures the private information we collect, read more here <https://www.hubspot.com/security>.

What are your data subject's rights?

Under new GDPR regulations, your rights as a data subject have been expanded. Whenever a data subject is about to submit their personal information, the data controller (usually a company) has to make sure the data subject has given their consent by "a statement or a clear affirmative action." You cannot be forced into consent, either through unawareness or 'implied' consent obtained from silence, pre-ticking boxes, or user inactivity.

The regulation also builds in two new rights for data subjects: a "right to be forgotten" and a "right to data portability". The former new right requires controllers to alert downstream recipients of deletion requests; the latter allows data subjects to demand a copy of their data in a common format. These two rights will now make it easier for users to request that any information stored should be deleted or that information that has been collected should be shared with them.

Data subjects always had a right to request access to their data; however GDPR enhances these rights. We aim to address user requests for private information within the GDPR 30-day window. In some cases, however, MPULL may refuse to grant an access request, for example where the request is deemed manifestly unfounded or excessive.

How can you request access to your information, object or complain?

At MPULL, we respect our clients' and users' concerns, complaints and queries, and seek to address and resolve them as quickly as possible. Should you wish to stop having MPULL track you via cookies with respect to personalised data that MPULL owns, controls and processes, please view our opt-in pop-up option or contact MPULL directly via email. This pop-up appears

the first time you visit our website. Additionally, you can, as shown above, also disable cookies through your own browser and device settings.

Since MPULL does not control the data collected by third-party services such as Facebook, LinkedIn or AdWords, MPULL cannot provide an opt-out option for these or provide the end user with the information collected via these platforms as the data is anonymized. However if you wish for the associated tracking cookies to be removed from your browser please follow these instructions:

For Edge, [click here](#)

For Internet Explorer, [click here](#)

For Mozilla Firefox, [click here](#)

For Google Chrome, [click here](#)

For Safari, [click here](#)

If you would like to opt out of or change the way MPULL communicates to you please click the 'opt out' or 'email preferences' hyperlinks that appear in the email footer.

If you would like more information about what information we may have collected on you, or want access to this personal data, or even wish to have it removed from our records, please contact us via our contact page form or by email.

Contact & Communication With us

Users contacting us through this website do so at their own discretion and provide any such personal details requested at their own risk. Your personal information is kept private and stored securely until a time it is no longer required or has no use, and in full compliance with GDPR and other data and private information laws depending on applicable jurisdiction.

Where we have clearly stated and made you aware of the fact, and where you have given your express permission, we may use your details to send you products/services information through a mailing list system. This is done in accordance with the regulations named in 'The policy' above.

External Website Links, Third-Party sites and Downloadables

In our website and related blog content, we may provide references and links to outside websites and resources, as well as downloadable files. Although we look to include only quality, safe and relevant external links, users are advised to adopt a policy of caution before clicking any external web links mentioned throughout this website or downloading files.

We cannot guarantee or verify the contents of any externally linked website despite our best efforts. Users should therefore note that they click on external links at their own risk and that we

cannot be held liable for any damages or implications caused by visiting any external links mentioned.

Any downloadable documents, files or media made available on this website are provided to users at their own risk. While all precautions have been undertaken to ensure only genuine downloads are available, users are advised to verify their authenticity using third-party antivirus software or similar applications.

We accept no responsibility for third-party downloads and downloads provided by external third-party websites, and advise users to verify their authenticity using third-party antivirus software or similar applications.

Changes To This Privacy Policy

This Privacy Policy is effective as of 20 April 2018 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our website.

Contact Us

If you have any questions about this Privacy Policy, please contact us via our website contact [form](#) or send physical correspondence to:

MPULL,
2nd Floor, Ebden House,
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