WEBSITE PRIVACY POLICY

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Our privacy policy covers 52 Group Limited of companies, its subsidiary companies 52 Films Limited, 52 Digital Limited and Stakeholder Limited, its Website: www.52group.com

By accessing this website, you consent to the processing of any Personal Data submitted by you to 52 Group Limited, 52 Films Limited 52 Digital Limited and Stakeholder Limited, pursuant to this Data Protection Policy, Data Protection Act 1998 and the General Data Protection Regulation 2018.

SECTION 1: Data Collection

1.1 Key details

This website privacy policy describes how 52 Group protects and makes use of the information you give the company when you use this website. If you are asked to provide information when using this website, it will only be used in the ways described in this privacy policy. This policy is updated as and when required. The latest version is published on this page. This website privacy policy was updated on November 10th 2018.

If you have any questions about this policy, please email info@52Group.com

1.2 Introduction

We gather and use certain information about individuals, in order to offer products and services that may be of interest to visitors to our website. This information is also used to enable certain functions on this website. We collect information to better understand how visitors use this website and to present timely, relevant information to them.

1.3 What data we gather

We may collect the following information:

- Name and job title
- Contact information including email address
- Demographic information, such as postcode, preferences and interests
- Website usage data
- Other information relevant to client enquiries

1.4 How we use information and data collected

Collecting this data helps us understand what you are looking from the company, enabling us to deliver improved products and services.

Specifically, we may use data:

- For our own internal records
- To improve the products and services we provide
- To contact you in response to a specific enquiry
- To customise the website for you
- To send you promotional emails about products, services, offers and other items we think might be relevant to you.
- To send you promotional mailings or to call you about products, services, offers and other things we think might be relevant to you.
- To contact you via email, telephone or mail for market research reasons.

1.5 Lawful bases for collecting data: consent and legitimate interest

We collect your data lawfully.

1.5.1 Consent

We only collect data if you have given your consent for us to do so. We define the term 'consent' according to the definition stated in the ICO: Guide to GDPR. 'Consent: the individual has given clear consent for you to process their personal data for specific purpose.'

1.5.2 Legitimate interest

We have a legitimate interest in collecting your data. 52 Group provide B2B products and services. We collect data to find businesses similar to those we already serve for marketing purposes. We therefore collect data that we will use to contact businesses our products and services would be of interest to. We define the term 'legitimate interest' according to the definition stated in the ICO: Guide to GDPR. 'Legitimate interest: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.'

1.6 Withdrawing your consent

You may change your mind and withdraw your consent at any time by:

- sending an email to info@52Group.com with the subject of the email being 'Marketing Opt-out.'
- You can also withdraw your consent by writing to us at:

52 Group Gable House, 18-24 Turnham Green Terrace W4 1QP London UK

• Alternatively, you can click unsubscribe

1.7 How long we retain your data

We retain your data for one year and perform an annual review of this data every February.

SECTION 2: Cookies and how we use them

2.1 What is a cookie?

A cookie is a small file placed on your computer's hard drive. It enables our website to identify your computer as you view different pages on our website. Cookies allow websites and applications to store your preferences in order to present content, options or functions that are specific to you. They also enable us to see information like how many people use the website and what pages they tend to visit.

2.2 How we use cookies

We may use cookies to:

- Analyse our web traffic using an analytics package. Aggregated usage data helps us improve the website structure, design, content and functions.
- Identify whether you are signed in to our website. A cookie allows us to check whether you are signed in to the site.
- Test content on our website e.g. 50% of our users might see one piece of content, the other 50% a different piece of content.
- Store information about your preferences. The website can then present you with information you will find more relevant and interesting.
- To recognise when you return to our website. We may show your relevant content, or provide functionality you used previously.

Cookies do not provide us with access to your computer or any information about you, other than that which you choose to share with us.

2.3 Controlling cookies

You can use your web browser's cookie settings to determine how our website uses cookies. If you do not want our website to store cookies on your computer or device, you should set your web browser to refuse cookies. Please note that doing this may affect how our website functions. Some pages and services may become unavailable to you. Unless you have changed your browser to refuse cookies, our website will issue cookies when you visit it. To learn more about cookies and how they are used, visit <u>All About Cookies</u>.

2.4 Controlling information about you

When you fill in a form or provide your details on our website, you will see notification stating that you have opted-in to receive marketing communications from us by email, telephone, text message or post. As stated in **Sub-section 1.4: Withdrawing your consent**, you can change your mind at any time by post or email.

SECTION 3: Security

3.1 Access to your information

We will always hold your information securely. To prevent unauthorised disclosure or access to your information, we have implemented strong physical and electronic security safeguards. We also follow stringent procedures to ensure we work with all personal data in-line with the General Data Protection Regulation.

3.2 Links from our site

Our website may contain links to other websites. Please note that we have no control of websites outside the 52 Group, 52 Films and 52 domain. If you provide information to a website to which we link, we are not responsible for its protection and privacy. Always be wary when submitting data to websites. Read the site's data protection and privacy policies fully.

3.3 Third-party cookie collection

Our website platform provider, HubSpot, collects cookies for us. Find out more about how HubSpot collect cookies here <u>What Cookies Are Used By HubSpot?</u>

3.4 Disclosure

Our website platform provider, HubSpot, may access your data while troubleshooting website issues for us.