



ARC DATA PRIVACY POLICY

Arc Data Limited, and 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.

Effective Date: 19 December 2018

This privacy policy sets out how Arc Data Limited handles your personal data. 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.

Arc Data Limited is a marketing agency which helps commercial and non-profit 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 is the data controller in respect of your personal data and our Data Protection Manager is Suzanne Lewis. If you have any requests concerning your personal data or any queries with regard to how we handle your data you can contact Suzanne Lewis by phone on 020 3475 6820, by email to Suzanne@arc-data.co.uk or write to us at Arc Data Limited, 163 City Road, EC1V 1NR. Company Registration Number: 11615386

Our company registration number is 11615386 and our Information Commissioners Office registration number is ZA471760.

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:

- 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.

Purpose of processing your personal data

Arc Data Limited collects 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 and telephone numbers and order histories that have taken place between our organisation and individuals.

Details of our B2B personal data collection processes, personal data held and the purpose for which it is used are detailed below:

Activity	Purpose of processing	Lawful basis
Registering for subscribing 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))
	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	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))
Third Party Data Purchases	Dealing with an order/ reservation/booking your place	Contract (Art 6.(1)(b))
	Internal accounting processes	Contract (Art 6.(1)(b))
	Provide you with information about our products and services	Consent (Art 6.(1)(a)) or Legitimate interests (Art 6.(1)(f))

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)) Consent (Art 6.(1)(a)) or Legitimate interests (Art 6.(1)(f))
Information generated by visiting our website or engaging with us on social media	IP addresses, social handles or usernames	Consent (Art 6.(1)(a))

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.

The legal basis on which we rely are:

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

Consent – Where you have provided Arc Data Limited specific consent to process your information. Consent will most commonly be obtained for cookie placement and email marketing communications promoting our service offerings including newsletters. In such circumstances you will be communicated 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 Suzanne Lewis by phone on 020 3475 6820, by email to suzanne@arc-data.co.uk or write to us at Arc Data Limited, 163 City Road, EC1V 1NR

Contract – 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 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.

1. Marketing

Own marketing

We would like to use your personal 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.

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 contact Suzanne Lewis by phone on 020 3475 6820, by email to suzanne@arc-data.co.uk or write to us at Arc Data Limited, 163 City Road, EC1V 1NR

Arc Data Limited may purchase third party B2B marketing databases which we use for acquisition purposes communicating with you about the services that we offer. 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.

2. Recipients/categories of recipients

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;
- 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 will ensure that they respect your privacy and abide by all data protection laws.

3. Transfer of your personal data outside the European Economic Area (EEA)

As part of our processing activities we ensure that your personal data is retained within the EEA, unless your data is processed in connection with our CACI service.

For the activity we do with CACI we may send data to a data cleansing bureau in the United States of America. The U.S. is not subject to an adequacy decision by the European Commission; the data cleansing company we use, however, has self-certified its compliance with the EU-U.S. Privacy Shield. The EU-U.S. Privacy Shield is an approved certification mechanism under Article 42 of the General Data Protection Regulation, which is permitted under Article 46(2)(f).

You can find out more about the EU-U.S. Privacy Shield here: <https://www.privacyshield.gov/welcome>

4. Retention periods

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.

5. Data subject's rights

You have rights in respect of your personal data. 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, utility bill.

The right to be informed – you have the right to be told about the collection and use of the personal data you provide. 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 have any questions on how and why we process your data please contact the DPO. 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 know whether we are processing your personal data, and to a copy of that data. We would need as much information as possible to enable us to locate your data. We will respond to your request within 28 days of receipt of your request. If you want to exercise this right, please contact the DPO at the contact details above. 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 have any incorrect personal data corrected or completed if it is incomplete. You can make this request verbally or in writing. We will need as much information as possible to enable us to locate your data. We will look at any request and inform you of our decision within 28 days of receiving the request. If you want to exercise this right, please contact the DPO at the contact details above. 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 valid reason for us to keep it. We will look at any request and inform you of our decision within 28 days of receiving the request. If you want to exercise this right, please contact the DPO at the contact details above. 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 ask us to restrict processing of your data. We will look at any request and inform you of our decision within 28 days of receiving the request. If you want to exercise this right, please contact the DP at the contact details above. 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. We will respond to your request within 28 days of receipt of your request. If you want to exercise this right, please contact the DPO at the contact details above. 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 exercise this right, please contact the DPO at the contact details above. 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 exercise this right, please contact the DPO at the contact details above. 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/>

6. Processing based on consent

Where we process your personal data based on your consent you have the right to withdraw that consent at any time without reason. You can opt-out by using the unsubscribe/opt-out in any marketing we send you and you can contact the Data Protection Manager using the contact details set out at the beginning of this privacy policy.

7. The right to lodge a complaint to the supervisory authority

If you are unhappy with any aspect of our handling of your data you can make a complaint to the Information Commissioner's Office - <https://ico.org.uk/concerns/>

8. 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.

10. Third party websites

Our website may contain links to other websites that are outside our control and are not covered by this Privacy Policy. If you access other sites using the links provided, the operators of these sites may collect information from you that will be used by them in accordance with their privacy policy, which may differ from ours.

11. Changes to the privacy policy

This privacy policy is regularly reviewed and will be updated when necessary.

If we make any significant changes to the policy we will communicate these with you.

If you are a consumer and wish to make a complaint then please contact us using the contact details set out at the beginning of this privacy policy.