



RAPTOR PRIVACY POLICY

Client: RAPTOR
Brand: RAPTOR
Detail: RAPTOR PRIVACY POLICY
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Privacy

This is the privacy statement for RAPTOR MARKETING (referred to as “we”, “us” or “our” in this privacy notice). It is effective as of July 2020.

Purpose of this privacy statement

This privacy statement explains how we collect and process your personal data, for example, data that you may provide through our website when you sign up online when you use our services or register to attend our events. We are committed to protecting your personal data and this privacy statement will explain how we look after it and what rights you have.

Our website and our services are not intended for children and we do not knowingly collect data relating to children.

How this privacy statement operates with our other privacy notices

It is important that you read this privacy statement together with any other privacy notices that we may provide on specific occasions when we are collecting or otherwise processing personal data about you so that you know how and why we are using it. This privacy statement supplements those other notices and is not intended to override them.

Our Contact Details

Our contact details are:

RAPTOR MARKETING

Agency: hello@raptor-london.co.uk

Postal address: Zetland House, 5-25 Scrutton Street, London, EC2A 4LF

Telephone number: [020 3757 6600](tel:02037576600)

If you have any questions about this privacy notice or how we deal with your personal data, including any requests to exercise your legal rights, please contact us using the details above.



Whose personal data do we process?

We collect and process the personal data of various categories of people who interact with us, most people who come to our events or register for our online services, but on occasion, we partner with universities who provide us with data. This privacy statement applies to all personal data we obtain and process, whichever category you might fall into, and what data we use and how we use it will depend on the particular circumstances, as explained within this notice.

What sort of personal data do we process?

The types of personal data that we will collect and use will depend on various circumstances, for example, your relationship with us, why you are interacting with us and the type of services or products you want us to provide to you. The data may include, for example:

- *identity information, such as your name, the university you attend, or company you work for*
- *contact details, such as your email address and phone number(s)*
- *interests, for example, if you're interested in films or particular sports*
- *CCTV and other visual or audio recordings, including photographs*
- *communication preferences*
- *dietary and other personal preferences or requirements*
- *payment details*
- *IP address, login data, browser type and version, operating system and other technology on the devices you use to access our website*
- *any other personal data we may obtain through you interacting with us*

When do we collect your personal data?

We obtain personal data about you in a variety of ways, such as when you:

- *open a web account with us*
- *ask us to provide you with our services or products*
- *send us enquiries*
- *fill in forms or surveys*
- *book on and attend our events, courses and other activities*
- *post information on or through our website, send us emails or other communications*
- *otherwise provide us with your personal data*

We may also receive and share personal data about you from and with third parties, such as the University you attend.



For what purpose do we collect your personal data?

We will only use your personal data for the purposes for which it has been provided to us. Generally, we will process your personal data in order to provide you with those of our services and other offerings you want to receive from us, but we occasionally do market research. You can see examples of the purposes for which we may use your personal data in the **“When do we collect your personal data?”** section.

Changing the purpose for which we use your personal data

We will only use your personal data for the purposes for which it has been provided to us, unless we reasonably consider that we need to use it for another reason that is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis that allows us to do so.

What lawful bases do we rely on to process your personal data?

We will only use your personal data in compliance with the law. Most commonly, where:

- *It is necessary for our legitimate interests (or those of a third party), and those interests do not override your interests or fundamental rights. Our legitimate interests are direct marketing. For example, email marketing campaigns. You can find out about your right to object to our processing of your personal data when we rely on our legitimate interests in our **“What are your legal rights?”** section.*
- *We need to perform a contract we are about to enter into or have entered into. For example, if a university uses our system we may need to process your personal data in order to fulfil that contract.*
- *We need to comply with a legal or regulatory obligation. For example, we may be required to share your personal data with any legal or regulatory authority to which we are subject.*
- *We may ask for your consent to process or share your data. If we do, you have the right to withdraw your consent at any time. You can find out more about your right to withdraw your consent in our **“What are your legal rights?”** section.*

Who do we share your personal data with?

We may need to share your personal data with other organisations from time to time, but we will maintain responsibility for what they do with your data and how it is processed. 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 we only



permit them to process your personal data for specified purposes and in accordance with our instructions. For example:

- *Service providers who process data for us, including those providing IT and system administration services and hosting.*
- *Organisations with which, or people with whom, we may be involved in the provision of any services to you, for example universities.*
- *We may also share your data with brands that you have shown an interest in, but only when you have granted explicit consent for us to do so.*

International transfer of your data

Generally, we process your personal data within the EEA. If we need to transfer your personal data out of the EEA, we will ensure a similar degree of protection is afforded to it as if it were being processed within the EEA. For example:

- *We will transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.*
- *Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.*
- *Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.*

How do we look after your data?

We have put in place appropriate security measures to help prevent your personal data from being accidentally lost, used or accessed in an unauthorised way. 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 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.

How long will we use your personal data for?

We will only keep your personal data for as long as necessary to fulfil the purposes for which we collected it or to enable us to comply with our legal obligations or enforce our legal rights.

Generally, the length of time we keep your data will depend on the type of personal data and the purpose for which we are processing it. To determine the appropriate retention period, we consider the amount, nature, and sensitivity of



the personal data, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process the personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

At the end of the retention period, we will either delete your data completely, or anonymise it so that, for example, we can aggregate it with other data so that it can be used, without identifying you.

You can contact us if you would like further information about our retention policy.

What are your legal rights?

You have various rights in relation to your personal data.

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. For further information, please see the **Accessing your data section**.

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.

Request erasure of your personal data. This enables you to ask us to delete or remove 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 the law. Note, however, that we may not always be able to comply with your request for erasure for specific legal reasons which, if applicable, we will notify to you.

Object to processing of your personal data where we are relying on our legitimate interests (or those of a third party) and there is something about your particular situation which makes you want to object to our processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes.



Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in any of the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will notify you if this is the case.

If you wish to exercise any of the rights set out above, please contact us

Accessing your data

Should you wish to access your data, the following information will apply:

- *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 may refuse to comply with your request in these circumstances.*
- *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.*
- *We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or if you have made a number of requests. In this case, we will notify you and keep you updated.*

- **Changes to this privacy statement or to your data**

This privacy statement may change from time to time so please check it periodically. Any significant changes will be posted on our website.



The personal data we hold about you needs to be accurate and up-to-date in order to comply with data protection law. Please let us know of any changes to your personal data so that we can correct our records.

- **Complaints**

Please **contact us** in the first instance if you have a concern about how we are dealing with your personal data, though you are entitled to complain at any time to the Information Commissioner's Office (ICO) at www.ico.org.uk.