

Data Cookie & Privacy Policy

Thank you for visiting our website. This privacy policy tells you how we use personal information collected at this website, emails and conversations (either face to face or over phone, Skype etc). Please read this privacy policy before using the site or submitting any personal information. By using the site, you are accepting the practices described in this privacy policy. These practices may be changed, but any changes will be posted and changes will only apply to activities and information on a going forward, not retroactive basis. You are encouraged to review the privacy policy whenever you visit the site to make sure that you understand how any personal information you provide will be used. Note: the privacy practices set forth in this privacy policy are for this web site only. If you link to other web sites, please review the privacy policies posted at those sites.

1. Collection of Information

- 1.1. We collect personally identifiable information, like names, postal addresses, email addresses, etc., when voluntarily submitted by our visitors.
- 1.2. The information you provide is used to fulfil your specific request.
- 1.3. This information is only used to fulfil your specific request, unless you give us permission to use it in another manner, for example to add you to one of our mailing lists.
- 1.4. Information provided shall be used to send marketing updates on products/services, newsletters and availability.
- 1.5. Information collated (either from online forms, emails or telephone conversations) shall be stored securely on a database.

2. Cookie/Tracking Technology

- 2.1 Our website uses cookies
- 2.2 The Site may use cookie and tracking technology depending on the features offered.
- 2.3 Cookie and tracking technology are useful for gathering information such as browser type and operating system, tracking the number of visitors to the Site, and understanding how visitors use the Site.
- 2.4 Cookies can also help customize the Site for visitors.
- 2.5 Personal information cannot be collected via cookies and other tracking technology, however, if you previously provided personally identifiable information, cookies may be tied to such information. Aggregate cookie and tracking information may be shared with third parties.

3. Legitimate Interest

- 3.1. We may contact you through phone, email or social media platforms, to introduce our services.

| Activity | Purpose of processing | Lawful basis |
|--|--|---|
| Completing the Website "Contact Us" form or Subscribing to Newsletters on the website | Provide you with information about our services | Consent/Legitimate interests Consent |
| Registering for an event | Dealing with your request to attend an event Providing you with information about our products and services] | Consent Legitimate interest |
| Making an enquiry | Dealing with your enquiries or requests Providing you with information about our products and services | Consent/Legitimate interests |

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| | | |
|--------------------------|-------------------------------|---------------------|
| Suppliers | Internal accounting processes | Contract |
| Clients Past/Present | Campaign update; Invoicing | Contract |
| Past/Prospective Clients | | Legitimate Interest |

- 3.2 **Consent:** Shall be gained either from the website “Contact Us” form, website cookies, or subscription of Newsletter; Consent shall also be taken from phone conversations, email correspondence and social media connection and messaging. Opt-in Data provided shall be used to introduce services.
- 3.3 **Contract:** Processing is necessary for us to administer the pre-contract and contractual relationship between Pebble Marketing UK and our suppliers/customers/prospective and past customers in connect with the performance of a contract.
- 3.4 **Compliance:** Collection of data is stored on secure ACT! CRM database; Outlook Emails and secure password protected social media sites.
- 3.5 **Legitimate Interests:** Data is used to outreach to past and prospective clients informing of telemarketing availability.
4. **Marketing**
- 4.1. We will only ever use the personal data you have provided us with for Pebble Marketing UK marketing purposes only.
- 4.2. 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 Oya Emir-Wilson at oya.emir@pebblemarketing.co.uk or write to Oya Emir-Wilson at 26 Cannock Road, Aylesbury, Bucks, HP20 2AN.
- 4.3. 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.
- 4.4. Profiling is not used for any marketing activities. No information or data is obtained from third parties.
5. **Third Party Marketing**
- 5.1. Your data will never be passed or sold to any third parties for marketing purposes.
6. **Recipients/Categories of Recipients**
- 6.1. In carrying out our business including our obligations to you, we do not use sub-contractors. Sub-contractors include mailing houses, email broadcasters, marketing agencies.
7. **Transfers to Third Countries**
- 7.1. No personal data shall be transferred outside the EEA.
8. **Retention Periods**
- 8.1. Personal data held (in any medium) that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. Information shall only be retained securely for a maximum of 6 years. We need to retain this data for our own accounting purposes and for legal and tax purposes.
- 8.2. Lapsed customers may regenerate their telemarketing campaigns within this time.
- 8.3. We shall retain documents/data to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk; and
- 8.4. If we believe that the documents may be relevant to any ongoing or prospective legal proceedings.
- 8.5. 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.
9. **Distribution of Information**

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9.9 We may share information with governmental agencies or other companies assisting us in fraud prevention or investigation. We may do so when:

9.9.1 Permitted or required by law; or,

9.9.2 Trying to protect against or prevent actual or potential fraud or unauthorized transactions; or,

9.9.3 Investigating fraud which has already taken place.

9.9.4 The information is not provided to these companies for marketing purposes.

9.9.5 No information is shared or sold to any third parties.

10 Commitment to Data Security

10.9 Your personally identifiable information is kept on our secure (password and firewall-protected) servers, in the UK.

10.10 We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal data.

10.11 You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

10.12 Only authorized employees, agents and contractors (who have agreed to keep information secure and confidential) have access to this information. All emails and newsletters from this site allow you to opt out of further mailings.

11 Privacy Contact Information

11.9 If you have any questions, concerns, or comments about our privacy policy you may contact us using the information below: We reserve the right to make changes to this policy.

11.10 Any changes to this policy will be posted.

12 Amendments

12.9 This policy may be updated from time to time, by publishing a new version on our website.

12.10 We encourage you to check this page occasionally to ensure you are happy with any changes.

12.11 Any new changes may be notified to you.

13 Data Subject Rights

13.1 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 driving licence/passport and 3 month old utility bill to ensure they are the data subject.

13.2 You may instruct us at any time not to process your personal information for marketing purposes.

13.3 In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

13.4 **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/>

13.4 **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/>

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- 13.5 **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/>
- 13.6 **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/>
- 13.7 **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/>
- 13.8 **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/>
- 13.9 **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/>
- 13.10 **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/>

14 Processing Based on Consent

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14.1 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 DPO at the contact details above.

15 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/>

16 Statutory/contractual requirement to provide personal data.

The personal data that you provide to us is necessary for us to carry out the contract you have entered into with us or for us to perform our obligations under Statute.

17 Cookies

17.1 A cookie is a small piece of information sent by a web server to a web browser, which enables the server to collect information from the browser. Find out more about cookies on <http://www.allaboutcookies.org/>

17.2 We use cookies to identify you when you visit this website and to keep track of your browsing patterns and build up a demographic profile.

17.3 Our use of cookies also allows registered users to be presented with a personalised version of the site, carry out transactions and have access to information about their account.

17.4 Most browsers will allow you to turn off cookies. If you want to know how to do this please look at the menu on your browser, or look at the instruction on <http://www.allaboutcookies.org/> Please note however that turning off cookies will restrict your use of our website.

17.5 Cookies we use

| Cookie | What it does | How to disable and consequences |
|--|---|---------------------------------|
| www.pebblemarketing.co.uk | <p>We use session cookies (which exist only until you close your web browser) and persistent cookies (which exist for longer). Some cookies on our website are needed so you can move around the website and use it. These cookies don't gather information about you that could be used for marketing or remember where you have been on the internet.</p> <p>Some cookies on our website collect information about how visitors use the website, e.g.. which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies visitors. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how our website works.</p> | Disable/Remove |
| www.twitter.com | <p>We may embed photos and videos from websites such as YouTube and Flickr. Or feeds from organisations like Facebook and Twitter. Enables you to share content through social networks. When you click these buttons, a cookie may be set by the service you have chosen to share content through.</p> | Disable/Remove |
| www.platform.twitter.com | | Disable/Remove |

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| | |
|--|----------------|
| www.daphnis.wbnusystem.net | Disable/Remove |
|--|----------------|

18 Third Party Websites

18.1 Links to other third-party websites, this policy will not apply to those other websites, and users should check the privacy policies of those other websites before giving them any information.

19 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 to you.

20 Our Details

20.1 This website is owned and operated by Pebble Marketing UK

20.2 Pebble Marketing UK's registered office is at: 26 Cannock Road, Elmshurst, Aylesbury, Buckinghamshire, HP20 2AN.

20.3 Our principal place of business is at: 26 Cannock Road, Elmshurst, Aylesbury, Buckinghamshire, HP20 2AN.

20.4 You can contact us:

20.4.1 By post, using the postal address: 26 Cannock Road, Elmshurst, Aylesbury, Buckinghamshire, HP20 2AN.

20.4.2 By telephone, using the mobile contact number: 07790 707968 weekdays, between the hours of 09:00 – 17:00.

20.4.3 By email, using the email address: oya.emir@pebblemarketing.co.uk.

Data Protection Collector/Lead/Officer:

Mrs Oya Emir-Wilson

T/As: Pebble Marketing UK

26 Cannock Road

Elmshurst

Aylesbury

Buckinghamshire

HP20 2AN

T: 01296 586558

M: 07790 707968

E: oya.emir@pebblemarketing.co.uk