# FINDLAY MEDIA LTD - PRIVACY POLICY

#### Introduction – how we use your information

Findlay Media Ltd ('FML') takes the privacy of its 'Users' (defined as any person who is a reader, accesses any FML website, or is a customer or client) very seriously and is committed to safeguarding their privacy and their personal information. FML complies with the principles of the Data Protection Act 1998 and the Privacy and Electronic Communications Regulations 2003. This Privacy Policy relates to FML's use of any personal information provided to them through the FML network of websites.

In order to provide users with its services, FML may request and/or record information about them. This privacy notice explains the type of information collected; how it will be used; whether it will be disclosed to third parties and the use of cookies.

FML websites contain hyperlinks to websites owned and operated by third parties and these websites will have their own privacy notices and FML encourage users to review them. FML does not accept any responsibility or liability for the practices of such third party websites and users should read carefully their privacy statements.

FML understands that some communications may be relevant to users and others are not and some unsolicited communications are unwelcome, so it is fully committed to ensuring that the rights and obligations set out in the Data Protection Act 1998 and the Privacy and Electronic Communications Regulations 2003 are respected.

#### Personal information collected

FML will ask for limited personal information when users register to receive a service from a FML website, such as a newsletter or take part in a competition or survey, or book a place at an event. FML will also collect personal information from users when they register for one of its publications or when users communicate over the telephone or via written correspondence. This can include information such as name, job title, postal address, telephone or mobile number, fax number, email address. The information collected will vary depending on the website, but only by supplying this data, is FML able to provide users with the services requested.

#### How the information is used

The personal information may be used for a number of purposes including the following:

- To carry out FML's obligations arising from user's registration or request.
- For market research surveys/analysis.
- For generic, anonymous tracking, to create general website statistics for analysis.
- User specific tracking to count page views of advertisers' information enhancements.
   Individuals selecting such information may be identified to the associated advertiser as interested viewers.
- To create a user online community.
- To comply with any legal or regulatory requirements.
- Planning and managing FML's business activities by understanding aggregated analysis on behaviour and habits.
- To provide users with other FML information, products or services, which it feels may interest them.
- Selected third parties will be permitted to use the data to provide users with information about goods and services, which may be of interest.

FML may also disclose user's personal information to any member of the FML group.

### Disclosure of information

FML may disclose user's personal data where it believes it is compelled to do so by law.

Occasionally, FML may share contact information with carefully selected third party companies whose products and services it feels may be of interest. FML will keep these offers relevant to user's interests. All will contain an easy method to unsubscribe from any email or mobile messages no longer wanted.

FML use a number of partner organisations to help provide a service to customers (e.g. fulfilment bureaus, subscription bureaus, mailing houses). These organisations act as data processors and sign a confidentiality agreement with FML to ensure that they can control how they use personal data.

Some of FML's partners may be located outside the European Economic Area (EEA). Countries outside the EEA may not be required to protect personal information as stringently as countries inside.

### User rights and access to information.

Under the Data Protection Act 1998 users have the right to request a copy of the personal information held about them. This right of access can be exercised in accordance with the Act. Any access may be subject to an administration fee of £10 to meet FML's costs.

If any of the personal information held by FML is incorrect, then please get in touch using the contact details below and it will updated as soon as practically possible.

### Changes to our Privacy Policy

This privacy policy may be updated at any time with or without notice in order to comply with new practices or regulations and will be posted on this page.

# Cookies and your privacy

Users should be aware that information may be collected through the use of cookies, whenever accessing FML websites and/or third party websites. Some cookies are essential for FML in order to provide users with the services they have requested. When using FML websites, users agree to the use of the non-essential cookies, unless they set their browser to reject them.

A cookie is a small file, which is placed on a user's device when they visit a website or open certain emails. A cookie itself does not contain or collect personally identifiable information. Cookies are used for the following purposes:

- Identifying users when they sign into a website, allowing them to see a customised version and therefore eliminating the need to re-enter their log-in details.
- Tracking use of FML websites to better develop them in the future.
- To speed up searches.

### Liability

The user shall indemnify FML against costs claims demands or expenses incurred or made against FML as a result of any breach of this Privacy Policy.

## How do I opt out of the various activities?

If you do not wish to receive certain types of communication, just let us know. When you register for any of our publications, you will be given the opportunity to opt out from all third party communications. Any marketing communications you do subsequently receive from us will always include a clear, simple method to 'opt-out' of future communications. This can be at various levels e.g. If you don't wish to receive any communications at all, we can stop everything - just let us know (using the contact details below). If you just want communications on certain subject areas stopped, again just let us know (use the contact details below). Alternatively you can simply block messages from particular magazines or specific third parties by using the option contained within all communications.

The Telephone Preference Service (TPS) and the Mailing Preference Service (MPS) offer consumers protection against unsolicited marketing contact. If you are registered on either service, FML will assume that your *subsequent* submission of personal data means that you have consented to receive marketing from us, unless otherwise instructed

# Contact

If you have any questions, comments or requests regarding this privacy policy, please contact;

Data Controller
Findlay Media Ltd
Hawley Mill
Hawley Road
Dartford
Kent
DA2 7TJ

EMAIL: datacontroller@findlay.co.uk