

active

PRIVACY POLICY

Important information and who we are

At Active Business Communications Limited, we are dedicated to safeguarding and preserving your privacy.

This Privacy Policy, together with our terms of use, explains what happens to any personal data that you provide to us, or that we collect from you when you use our site, communications and/or any of our services (the “**Services**”).

Controller

Active Business Communications Limited is the data controller and is responsible for your personal data.

If you have any questions about this privacy policy, please contact us at <https://www.activeukltd.com/contact/>

Note that you may contact the Information Commissioner’s Office (“ICO”), the UK supervisory authority for data protection issues (www.ico.org.uk) at any time if you are not satisfied with the way we have handled your data. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy

We may make changes to this policy from time to time and we will inform you if we do.

Consent

By using our Services, you give consent to the collection, processing, use and sharing of your personal data. We will give you choices about how and with whom you share personal data.

Information we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- “**Identity Data**” including, for example, name and date of birth.
- “**Contact Data**” includes your address, any billing or delivery addresses, email addresses telephone numbers and other contact details.
- “**Financial Data**” includes bank account and payment card details.
- “**Transaction Data**” includes details about payments to and from you and products and services you have purchased from us.
- “**Technical Data**” includes IP addresses, login data, browser data, operating systems, platform and other technology on the devices you use to access the Services.
- “**Profile Data**” includes applicable usernames, passwords, purchases, and preferences and data about, uploaded content, messages, forms and or communications with us, or other users, through our Services.
- “**Usage Data**” includes information about how you use the Services.
- “**Marketing Data**” includes your preferences concerning marketing and other communications.

We also collect, use and share “**Aggregated Data**” such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is **not** considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect data about your race, ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, healthcare, genetic or biometric data). We do not collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services).

How your personal data is collected

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Financial, Profile and other data by providing us with those details, using the Services and by communicating with us and our service partners. You may also share the same data with our service partners.

- **Automated technologies or interactions.**

As you interact with our Services, we may automatically collect Technical, Profile Data and other data about you. We collect data by using cookies, site logs, our apps and other technologies.

- **Third parties or publicly available sources.**

We may receive personal data about from various third parties and public sources as such as analytics providers (such as Google). We may also receive Contact, Financial and Transaction Data from providers of technical, payment and delivery services.

How your personal data will be used and shared

We may process, use and share your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. If you need further details, you may contact us through the Service.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you, set up, operate and manage the provision of the Services to you, and any accounts you hold with us.	Identity Contact	<ul style="list-style-type: none">• Performance of our contracts with you.
To process and deliver orders, provide you with the Services, and manage payments.	Identity Contact Financial Profile Transaction Marketing	<ul style="list-style-type: none">• Performance of a contract with you.• Developing the Services and assisting you to get the most out of them.• Manage the Services and enforce our rights (e.g. recovering sums due to us).
To manage our relationship with you and others, provide ongoing services which will include: <ul style="list-style-type: none">• managing the provision to and storage of data with us;• updating the Services;• communicating with you; and• facilitating communications with our service partners	Identity Contact Profile Marketing	<ul style="list-style-type: none">• Performance of a contract with you.• Necessary to comply with legal obligations.• Developing the Services and assisting you to get the most out of them.• To enable service partners to deliver services to you.• For records, updating and compliance purposes and adapt to how customers use our products and services.
To administer and protect our business (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Contact Financial Profile Usage	<ul style="list-style-type: none">• Required for the purposes of running and administering the Services, and our services, network security and to combat fraud.• To comply with a legal obligations.

To use data analytics to improve our Services, customer relationships and experiences	Identity Contact Profile Usage Marketing Technical	<ul style="list-style-type: none"> • To develop, update and keep the Services relevant, to ensure they provides you want you want out of them. • To enable other users to help you get the most out of the Services.
To contact you with suggestions, recommendations, training opportunities and information that may be of interest an and keeping you informed.	Identity Contact Profile Usage Marketing Technical	<ul style="list-style-type: none"> • To develop the Services. • To help you get the most out of the Services. • To enable our services partners to help you get the most out of the Services.

Promotional offers and marketing

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and opportunities may be relevant for you.

Unless you opt out as part of the Services, we will use this information to make you aware of such products and services and opportunities.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you need any further information, you can <https://www.activeukltd.com/contact/>.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Third-party contacts and disclosures of your data

As part of our Services, our service partners may contact you but only by the means permitted by us.

We will get your express opt-in consent before we share your personal data with any other third party for any marketing or other purpose, except that we may disclose your data to:

- any member of our group, for the purposes described above;
- where we are legally required to disclose your information;
- to assist fraud protection and minimise credit risk;
- our service partners for the purpose of providing the Services;
- professional advisers including lawyers, bankers, auditors and insurers based in the UK for the purposes of providing professional services;
- HM Revenue & Customs, regulators and other authorities in the UK who require reporting of processing activities in certain circumstances; and/or
- third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

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

International transfers

We may share data with service providers who may be based outside of the European Economic Area (“**EEA**”). Any processing of your personal data may therefore involve a transfer of data outside the EEA. Any transfer of data will be made in accordance with data protection legislation.

Nevertheless, we may restrict or prevent:

- any transfer of personal data to countries that have not been deemed to provide an adequate level of protection for personal data by the European Commission;
- certain service providers or users from accessing or sharing personal data where we consider that it may conflict with any data protection rule binding on us; or
- any transfer of personal data to a person in the US that is not a part of the Privacy Shield, which requires any third party provider in the US to provide similar protection to personal data shared between the Europe and the US.

Please contact us at <https://www.activeukltd.com/contact/> for further information.

Data security

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

Data retention

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax and legal compliance purposes.

In some circumstances you can ask us to delete your data, more details are below.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Under certain circumstances, you have rights under data protection laws in relation to your personal data. You may contact us through the Service to:

- Access to your personal data;
- Correct any personal data.
- Erase your personal data.

Further requests

If you <https://www.activeukltd.com/contact/> to request more details, 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 you have made a number of requests. In this case, we will notify you and keep you updated.

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.
- **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, though we may need to verify the accuracy of the new data you provide to us.
- **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 local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in 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 Services to you. We will advise you if this is the case at the time you withdraw your consent.

Use of Cookies

Our websites use cookies to distinguish you from other users of our website and allow us to collect information about you to help us improve our site. We use cookies to help us ensure it is meeting your needs and make improvements.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie Name	Vendor	Purpose	Expires
_ga	google.com	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	2 years
_gat	google.com	Google Analytics cookies. The Google Analytics tool collects anonymous information about how visitors use our websites, for example how many visitors came to our website and when, what browsers visitors use and how long visitors stay on the site. This data does not contain any information that is personal to you.	10 minutes
_gid	google.com		1 day

Cookie Name	Vendor	Purpose	Expires
NID	google.com	This third party cookie is used to collect information about how visitors use the site. The information is used to compile reports to improve the site. The cookie collects information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. More information about Google cookies: http://www.google.com/intl/en-GB/policies/technologies/cookies/	6 months
test_cookie	doubleclick.net	Used to check if the user's browser supports cookies.	When browsing session ends
hp_check	activeukltd.com	This is a cookie set to only show the home page animation on the first visit.	When browsing session ends
PHPSESSID	leadinsight webtracker.net	The PHPSESSID cookie is native to PHP and enables websites to store serialised state data. On this website it is used to establish a user session and to pass state data via a temporary cookie, which is commonly referred to as a session cookie. As the PHPSESSID cookie has no timed expiry, it disappears when the client is closed.	When browsing session ends
_hssc	hubspot.com	This cookie keeps track of sessions. This is used to determine if we should increment the session number and timestamps in the __hstc cookie. It contains the domain, viewCount (increments each pageView in a session), and session start timestamp.	30 minutes
__hssrc	hubspot.com	Whenever HubSpot changes the session cookie, this cookie is also set. We set it to 1 and use it to determine if the visitor has restarted their browser. If this cookie does not exist when we manage cookies, we assume it is a new session.	When browsing session ends
__hstc	hubspot.com	The main cookie for tracking visitors. It contains the domain, utk, initial timestamp (first visit), last timestamp (last visit), current timestamp (this visit), and session number (increments for each subsequent session).	2 years
__cfduid	cloudflare.com	Used by the content network, Cloudflare, to identify trusted web traffic.	1 year
_hjIncludedInSample	hotjar.com	This session cookie is set to let Hotjar know whether that visitor is included in the sample which is used to generate funnels.	When browsing session ends
_hs_opt_out	hubspot.com	This cookie is used by the opt-in privacy policy to remember not to ask the visitor to accept cookies again. This cookie is set when you give visitors the choice to opt out of cookies.	2 years
hsfirstvisit	hubspot.com	This cookie used to keep track of a user's first visit.	10 years
hubspotutk	hubspot.com	This cookie is used for to keep track of a visitor's identity. This cookie is passed to HubSpot on form submission and used when de-duplicating contacts.	10 years

Cookie Name	Vendor	Purpose	Expires
bcookie	linkedin.com	These cookies are used for advertising tracking both on and off the LinkedIn sites, and bring customized features to you through LinkedIn plugins such as the "Share" button.	2 years
BizoID	linkedin.com		6 months
bscookie	linkedin.com		2 years
lang	linkedin.com		When browsing session ends
lidc	linkedin.com		1 day
UserMatchHistory	linkedin.com		6 months
vuid	vimeo.com	These cookies track information about how the Vimeo Service is being used so that they can make improvements and report on performance. They might also use analytics cookies to test new ads, pages, or features to see how users react to them. More information can be found here: https://vimeo.com/cookie_policy	2 years
player	vimeo.com	Used by the content network, Cloudflare, to identify trusted web traffic.	1 year

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You may block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

Third Party Links

You may find links to third party websites on our website. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. These websites should have their own privacy policies which you should check.

We do not accept any responsibility or liability for their policies whatsoever as we have no control over them.