

## PRIVACY POLICY

Last Updated [29 May 2018]

We respect the privacy of every person who visits [www.fovea.tv](http://www.fovea.tv) (the “Site”) and who uses the services that we promote on our Site (our “Services”) and we are committed to ensuring a safe online experience. We also respect the privacy of every person whose personal information we may process as a result of providing the Services to others or who applies to work at Fovea.

### 1 PURPOSE OF THIS POLICY

This privacy policy (“**Privacy Policy**”) explains our approach to any personal information that we might collect from you or which we have obtained about you from a third party and the purposes for which we process your personal information. This Privacy Policy also sets out your rights in respect of our processing of your personal information.

*This Privacy Policy will inform you of the nature of the personal information about you that is processed by us and how you can request that we delete, update, transfer it and/or provide you with access to it.*

*This Privacy Policy is intended to assist you in making informed decisions when using the Site and our Services. Please take a moment to read and understand it.*

*Please also note that this Privacy Policy only applies to the use of your personal information obtained by us, it does not apply to your personal information collected during your communications with third parties.*

### 2 WHO ARE WE?

The Site and our Services are operated by Fovea Communications Limited, (“**we**”, “**us**” or “**our**”).

*Fovea Communications Limited is the data controller responsible for your personal information.*

*Fovea Communications Limited is an English company with registered company number: 05757431 and whose principal office is at Langdale House, 11 Marshalsea Road, London, SE1 1EN.*

### 3 HOW TO CONTACT US?

If you have any questions about this Privacy Policy or want to exercise your rights set out in this Privacy Policy, please contact us by:

- sending an e-mail to [info@fovea.tv](mailto:info@fovea.tv); or
- calling us on: +44 (0) 207 089 2627

### 4 WHAT PERSONAL INFORMATION DO WE COLLECT AND HOW DO WE USE IT?

Our primary goal in collecting personal information from you is to: (i) verify your identity; (ii) help us deliver our Services; (iii) help us improve the Services and develop and market new services; (iv) send you marketing communications; (v) carry out requests made by you on the Site; (vi) investigate or settle inquiries or disputes; (vii) comply with any applicable law, court order, other judicial process, or the requirements of a regulator; (viii) enforce our agreements with you; (ix) protect the rights, property or safety of us or third parties, including our other clients and users of the Site and visitors at our offices; (x) provide support for the provision of our Services; (xi) recruitment purposes; and (xii) use as otherwise required or permitted by law.

In particular, we use your personal information for the following purposes:

➤ **Fulfilment of services.**

*We collect and maintain personal information that you voluntarily submit to us during your use of the Site and/or our Services. We use the contact details you have provided to us so that we can fulfil the supply of services you have engaged us to provide.*

**Who do we share your personal information with for this purpose?**

We will share, where relevant, your personal information (e.g. name and job title, contact information including email address, other information relevant to provision of our Service, or any personal information that you provide to us as part of our providing the Services) with the following categories of third parties:

- **Web hosting, optimisation and management companies** who assist us with the hosting, operation, optimisation and maintenance of our Site and the administration of your account with us.

Please note this list is non-exhaustive and there may be circumstances where we need to share personal information with other third parties in order to provide the products and services as effectively as we can.

**What is our legal basis?**

It is necessary for us to use your personal information to perform our obligations in accordance with any contract that we may have with you.

➤ **Site insight and analysis.**

Where you have given your consent (where lawfully required), we use cookies, log files and other technologies to collect minimal personal information from the computer hardware and software you use to access the Site, or from your mobile. This includes the following:

- an IP address to monitor Site traffic and volume;
- the type of browser and operating system you used;
- the date and time that you visited the Site;
- a session ID to track usage statistics on our Site;
- referring website addresses.

Our web pages and e-mails contain "cookies", "web beacons" or "pixel tags" ("**Tags**"). Tags allow us to track receipt of an e-mail to you, to count users that have visited a web page or opened an e-mail and collect other types of aggregate information. Once you click on an e-mail that contains a Tag, your contact information may subsequently be cross-referenced to the source e-mail and the relevant Tag.

In some of our e-mail messages, we use a "click-through URL" linked to certain websites administered by us or on our behalf. We may track click-through data to assist in determining interest in particular topics and measure the effectiveness of these communications.

Please see our Cookie Policy for further information.

By using this information, we are able to measure the effectiveness of our content and how visitors use our Site and our Services. This allows us to learn what pages of our Site are most attractive to our visitors.

**Who do we share your personal information with for these purposes?**

We share your personal information with a variety of third party service providers to assist us with customer insight analytics, such as Salesforce. Other providers are described in our Cookie Policy.

**What is our legal basis?**

Where your personal information is completely anonymised, we do not require a legal basis to use it as the information will no longer constitute personal information that is regulated under

*data protection laws. However, our collection and use of such anonymised personal information may be subject to other laws where your consent is required.*

*Where your personal information is not in an anonymous form, it is in our legitimate interest to use your personal information in such a way to ensure that we provide the very best products and services to you and our other clients.*

➤ **Email marketing. For more information click here**

*We use information that we observe about you from your interactions with our Sites, our email communications to you and/or with our products and services (see the 'Site Insight and Analysis' section above for more details of the information collected and how it is collected) and/or your name and email address, to send you marketing communications by email, where you have consented to receive such marketing communications, or where we have another lawful basis to do so.*

**What is our legal basis?**

*Where your personal information is completely anonymised, we do not require a legal basis to use it as the personal information will no longer constitute personal information that is regulated under data protection laws. However, our collection and use of such anonymised personal information may be subject to other laws where your consent is required. Please see our Cookie Policy for further details.*

*Where your personal information is not in an anonymous form, it is in our legitimate interest to use your personal information for marketing purposes.*

*We will only send you marketing communications via email where you have consented to receive such marketing communications, or where we have a lawful right to do so.*

➤ **Business administration and legal compliance. For more information click here**

*We use your personal information for the following business administration and legal compliance purposes:*

- *to obtain IT support;*
- *to comply with our legal obligations;*
- *to enforce our legal rights;*
- *protect rights of third parties; and*
- *in connection with a business transition such as a merger, acquisition by another company, or sale of all or a portion of our assets.*

**Who do we share your personal information with for these purposes?**

*We will share your personal information with professional advisers such as IT support providers, lawyers and accountants and/or governmental or regulatory authorities.*

**What is our legal basis?**

*Where we use your personal information in connection with IT support, to enforce our legal rights, to protect the rights of third parties or as part of a business transition, it is in our legitimate interest to do so. For all other purposes described in this section, it is our legal obligation to use your personal information to comply with any legal obligations imposed upon us such as a court order.*

*Where we share your sensitive personal information, we shall obtain your consent to do so.*

➤ **Recruitment. For more information click here**

*We may use your personal information (e.g. name, job title, contact information including email*

address, curriculum vitae, your education, employment history and similar matters and similar information that you may provide to us and any other information relevant to potential recruitment to Fovea) for the following recruitment purposes:

- To assess your suitability for any position for which you may apply at Fovea whether such application has been received by us online, via email or by hard copy or in person application or through a third party recruitment agency.
- To review Fovea's equal opportunity profile in accordance with applicable legislation, and Fovea does not discriminate on the grounds of gender, race, ethnic origin, age, religion, sexual orientation, disability or any other basis covered by local legislation. All employment related decisions are made entirely on merit.

**Who do we share your personal information with for these purposes?**

We will share your personal information with external recruiters where we have engaged them to find a candidate for a specific role at Fovea.

**What is our legal basis?**

Where we use your personal information in connection with recruitment it will be in connection with us taking steps at your request to enter into a contract we may have with you or it is in our legitimate interest to use personal information in such a way to ensure that we can make the best recruitment decisions for Fovea. We will not process any special data except where we are able to do so under applicable legislation or with your explicit consent which shall be obtained at the time we collect your personal information following the instructions provided.

- Any other purposes for which we wish to use your personal information that are not listed above, or any other changes we propose to make to the existing purposes will be notified to you using your contact details.

**5 HOW DO WE OBTAIN YOUR CONSENT?**

Where our use of your personal information requires your consent, you can provide such consent:

- at the time we collect your personal information following the instructions provided; or
- by informing us by e-mail, post or phone using the contact details set out in this Privacy Policy.

**6 OUR USE OF COOKIES AND SIMILAR TECHNOLOGIES**

Our Site uses certain cookies, pixels, beacons, log files and other technologies of which you should be aware. Please see our Cookie Policy to find out more about the cookies we use and how to manage and delete cookies.

**7 THIRD PARTY LINKS AND SERVICES**

Our Site contains links to third party websites and services. Please remember that when you use a link to go from our Site to another website or you request a service from a third party, this Privacy Policy no longer applies.

*Your browsing and interaction on any other websites, or your dealings with any other third party service provider, is subject to that website's or third party service provider's own rules and policies and you should contact the appropriate third party if you have any questions. We do not monitor, control, or endorse the privacy practices of any third parties.*

**8 TRANSFERS OUTSIDE THE EEA**

Where necessary in order to deliver our services, we will transfer personal information to countries outside the EEA. When doing so, we will comply with our legal and regulatory obligations in relation to the personal information including having a lawful basis for transferring personal information and putting appropriate safeguards in place to ensure an adequate level of protection for the personal information.

## **9 HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION FOR?**

We do not keep your personal information for any specific period but will not keep it for longer than is necessary for our purposes.

In considering how long to keep it, we will take into account its relevance to our business and our legal and regulatory obligations.

## **10 CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL INFORMATION**

We are committed to keeping the personal information you provide to us secure and we will take reasonable precautions to protect your personal information from loss, misuse or alteration.

*We have implemented information security policies, rules and technical measures to protect the personal information that we have under our control from:*

- *unauthorised access;*
- *improper use or disclosure;*
- *unauthorised modification; and*
- *unlawful destruction or accidental loss.*

*All of our employees and data processors (i.e. those who process your personal information on our behalf, for the purposes listed above), who have access to, and are associated with the processing of personal information, are obliged to respect the confidentiality of the personal information of all users of our Services.*

## **11 HOW TO ACCESS YOUR INFORMATION AND YOUR OTHER RIGHTS?**

You have the following rights in relation to the personal information we hold about you:

➤ **Your right of access.**

*If you ask us, we'll confirm whether we're processing your personal information and, if so, provide you with a copy of that personal information (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.*

➤ **Your right to rectification.**

*If the personal information we hold about you is inaccurate or incomplete, you're entitled to have it rectified. If we've shared your personal information with others, we'll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.*

➤ **Your right to erasure.**

*You can ask us to delete or remove your personal information in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable). If we've shared your personal information with others, we'll let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.*

➤ **Your right to restrict processing.**

*You can ask us to 'block' or suppress the processing of your personal information in certain circumstances such as where you contest the accuracy of that personal information or you object to us processing it. It won't stop us from storing your personal information though. We'll tell you before we lift any restriction. If we've shared your personal information with others, we'll let them know about the restriction where it is possible for us to do so. If you ask us, where it is*

*possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.*

➤ **Your right to data portability.**

*You have the right, in certain circumstances, to obtain personal information you've provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.*

➤ **Your right to object.**

You can ask us to stop processing your personal information, and we will do so, if we are:

- relying on our own or someone else's legitimate interests to process your personal information, except if we can demonstrate compelling legal grounds for the processing; or
- processing your personal information for direct marketing.

➤ **Your rights in relation to automated decision-making and profiling.**

*You have the right not to be subject to a decision when it's based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for entering into, or the performance of, a contract between you and us.*

➤ **Your right to withdraw consent.**

*If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.*

➤ **Your right to lodge a complaint with the supervisory authority.**

*If you have a concern about any aspect of our privacy practices, including the way we've handled your personal information, you can report it to the UK Information Commissioner's Office (ICO). You can find details about how to do this on the ICO website at <https://ico.org.uk/concerns/> or by calling their helpline on 0303 123 1113.*

## **12 CHANGES TO THIS PRIVACY POLICY**

We may make changes to this Privacy Policy from time to time.

*To ensure that you are always aware of how we use your personal information we will update this Privacy Policy from time to time to reflect any changes to our use of your personal information. We may also make changes as required to comply with changes in applicable law or regulatory requirements. We will notify you by e-mail of any significant changes. However, we encourage you to review this Privacy Policy periodically to be informed of how we use your personal information.*