

## Privacy Notice

### 1. Introduction

Milltown respects your privacy and is committed to protecting your personal data. This privacy notice is for:

- Clients who are individuals
- Potential clients who are individuals
- Business clients' staff
- Potential business clients' staff
- Suppliers' staff
- Potential suppliers' staff
- Job applicants
- Individuals who we interview for brand research / analysis

This privacy notice will inform you as to how we look after your personal data, what your privacy rights are and how the law protects you.

### 2. Important information and who we are

#### **Please read this privacy notice**

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

#### **Controller**

Milltown Partners GBR Limited is the controller and responsible for your personal data (collectively referred to as "Milltown", "we", "us" or "our" in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, please contact the data privacy manager using the details set out below.

## Contact details

- Full name of legal entity: Milltown Partners GBR Limited
- Name or title of data privacy manager: Chief Operating Officer
- Email address: info@milltownpartners.com
- Postal address: 9 Cavendish Square, London, W1G 9DF.
- Telephone number: +44 (0) 20 7487 2583.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## 3. Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 30 September 2021.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## 4. The data 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 the following different kinds of personal data about you:

- Identity Data includes first name and last name.
- Contact Data includes email address and telephone numbers.
- Employment/Education History Data for example on a CV (job applicants only).
- Sensitive Personal Data includes racial or ethnic origin, political opinions, religious and philosophical beliefs, data concerning health, sex life and orientation (clients only).
- Brand Opinion Data includes opinions on brands (corporate and personal brands).

## **5. How is your personal data collected?**

### **Direct interactions**

You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you enquire about our services.

If you are a job applicant, you or a recruitment agency may provide us with a copy of your CV containing Employment/Education History Data when you apply for a position with us.

If you are a client, you may provide us with Sensitive Personal Data. In such circumstances we will ask you to provide explicit consent to us processing your Sensitive Personal Data or, if the business you work for is the controller of such data and we agree to process that data, we will enter into a data processor arrangement with your business.

If we interview you for research purposes, you may provide us with Brand Opinion Data when you send us your views on a brand or when you discuss your views with us in face-to-face meetings / workshops.

## **6. How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data simply to reply to an enquiry that you have sent us, to provide our services to you or your business, to receive goods or services from your business, to consider your job application or to undertake brand research and analysis. We will also use your personal data to send you information about our services.

See section 12 below to find out more about the types of lawful basis that we will rely on to process your personal data.

### **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

### **Service offers from us**

We may use your personal 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 services may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us and you may receive marketing communications from us if we are legally permitted to make unsolicited contact with you. We will not contact you if you have opted out of receiving that marketing.

### **Third-party marketing**

We do not share your personal data with any company outside our group of companies for marketing purposes.

### **Opting out**

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

### **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 would like an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

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.

## **7. Disclosure of your personal data**

We may share your personal data with the parties set out below for the purposes set out in section 5 above.

Internal Third Parties as set out in section 12 below.

External Third Parties as set out in section 12 below.

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 notice.

All third parties are required to respect the security of your personal data and to treat it in accordance with the law.

In respect of individuals who we interview for brand research / analysis purposes – we may pass on your opinions to our clients and prospective clients. However, we do not provide our clients or prospective clients with a means of associating you, as an individual, with your opinions. We do not pass on your name, for example. As such we do not disclose your personal data to our clients or prospective clients.

## **8. International transfers**

We do not transfer your personal data outside the European Economic Area (EEA) other than as set out below.

Like most businesses we use software to support our operations. For example, we use Microsoft and Google as our email providers. Your personal data may therefore be transferred out of the EEA because Microsoft, Google and other major players in the software industry store some of their data in the U.S.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only 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. For example, we have an agreement in place with our U.S. affiliate (Milltown LP) that contains European Commission approved controller-to-processor clauses.

- Where we use providers based in the U.S., we may, instead of using model contracts approved by the European Commission, transfer data to them if they are listed on the EU-U.S. Privacy Shield List.

### **What is the EU-U.S. Privacy Shield List?**

The EU-U.S. Privacy Shield Framework was designed by the U.S. Department of Commerce and the European Commission to provide companies on both sides of the Atlantic with a mechanism to comply with data protection requirements when transferring personal data from the European Union to the United States in support of transatlantic commerce. On July 12, 2016, the European Commission deemed the EU-U.S. Privacy Shield Framework adequate to enable data transfers under EU law.

The Privacy Shield program, which is administered by the International Trade Administration (ITA) within the U.S. Department of Commerce, enables U.S.-based organisations to join the EU-U.S. Privacy Shield Framework in order to benefit from the EU's adequacy determinations. To join the EU-U.S. Privacy Shield Framework, a U.S.-based organisation is required to self-certify to the U.S. Department of Commerce and publicly commit to comply with the Framework's requirements.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## **9. 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.

## 10. Data retention

### How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our data retention policy which you can request by contacting us.

In some circumstances you can ask us to delete your data: see “request erasure” in section 11 below for further information.

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.

## 11. Your legal rights

Under certain circumstances, you have rights under data protection laws 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.

**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 certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

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

### **No fee usually required**

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.

### **What we may need from you**

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.

### **Time limit to respond**

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.

## **12. Glossary**

### **LAWFUL BASIS**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

## **THIRD PARTIES**

### **Internal Third Parties**

Our affiliate that is based in the U.S.: Milltown LP.

### **External Third Parties**

- Service providers who provide IT and system delivery/administration services.
- Professional advisers who provide, for example, accountancy and legal services.
- Regulators and other authorities who may require reporting of processing activities in certain circumstances.