

## ATN Privacy Policy

### Overview – the key information you should be aware of

- (A) **Who we are:** We are ATN Agency Ltd (a company registered in England and Wales (company number 07685259), whose registered office is at 7 Rathbone Street, London W1T 1NB, United Kingdom) – also referred to in this policy as 'we', 'us' and 'ATN'.

References in this policy to "our website" are to the website at [www.alltogethernow.agency](http://www.alltogethernow.agency). If you wish to contact us about anything in this privacy policy please email us at [safeandsound@theandpartnership.com](mailto:safeandsound@theandpartnership.com).

- (B) **Our values and what this policy is for:** We value your privacy and want to be *accountable* and *fair* to you as well as *transparent* with you in the way that we collect and use your personal information. We also want you to know *your rights* in relation to your information which you can find [in section 6](#)

In line with these values, this privacy policy tells you what to expect when we collect and use personal information about you. We have tried to make it easy for you to navigate so you can find the information that is most relevant to you and our relationship with you.

We are always looking to improve the information we provide to our customers and contacts so if you have any feedback on this privacy policy, please let us know using our contact details in [section 12](#).

- (C) **Who this policy applies to:** This policy applies to:

- [Visitors to our website](#) (Section 2.1); and
- [Business contacts](#) (Section 2.2)

Depending on our relationship, we will collect and use your information in different ways. Please click on the links above to find out the information that we collect about you and how we use this information.

- (D) **What this policy contains:** This privacy policy describes the following important topics relating to your information (you can click on the links to find out more):

1. **How we obtain your personal information**
2. **Collection of your personal information and how we use it**
3. **Legal basis for use of your personal information**
4. **How and why we share your personal information with others**
5. **How long we store your personal information**
6. **Your rights**
7. **Marketing**
8. **Where we may transfer your personal information**
9. **Risks and how we keep your personal information secure**
10. **Links to other websites**

## 11. Changes to our privacy policy

## 12. Further questions and how to make a complaint

(E) **Your rights to object:** You have various rights in respect of our use of your personal information as set out in [section 6](#). Two of the fundamental rights to be aware of are that you may:

- ask us to stop using your personal information for direct-marketing purposes. If you exercise this right, we will stop using your personal information for this purpose;
- ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our, or another person's, legitimate interest.

You can find out more information in [section 6](#)

(F) **What you need to do and your confirmation to us:** Please read this privacy policy carefully to understand how we handle your personal information. By engaging with us in the ways set out in this privacy policy, you confirm that you have read and understood the entirety of this privacy policy, as it applies to you.

### The detail – the key information you should be aware of

#### 1. How we obtain your personal information

1.1 You may provide us with your personal information voluntarily. However, we may also receive information about you from third parties such as our suppliers and public websites, which we refer to as "third party sources" or "suppliers" throughout this policy.

1.2 You may give us personal data about yourself in the course of interactions with our staff (for instance if you give them your business card), when you fill in a form on our website or when you contact us by phone, e-mail or other means. If you contact us, we may keep a record of that correspondence. We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to such surveys.

#### 2. Collection of your personal information and how we use it

Please go to the section or sections below that best describes our relationship with you to find out the information that we collect about you and how we use this information. We refer to this as "personal information" throughout this policy.

##### 2.1 Visitors to our website

(a) What personal information we collect about you

We, or third parties on our behalf, collect and use technical information created and recorded automatically when you visit our website. This includes: The Internet Protocol (IP) address used to connect your computer to the internet address; the website address and country from which you access information; the files requested; browser type and version; browser plug-in types and versions; operating system; and platform. We use this personal information to administer our website, to measure the efficiency of our systems and to undertake an analysis of the locations from which people access our webpages;

(b) How we use your personal information

We will collect, use and store the personal information listed above for the following reasons:

- (i) to allow you to access and use our website;
- (ii) for improvement and maintenance of our website and to provide technical support for our website; and
- (iii) to evaluate your visit to the website through the use of cookies (see below for our cookie policy). Please see sections 2.3 and 2.4 for more details about how we use your personal information.

(c) A word about cookies

- (i) Some pages on our website use cookies, which are small files placed on your internet browser when you visit our website. We use cookies in order to offer you a more tailored experience in the future, by understanding and remembering your particular browsing preferences.
- (ii) Where we use cookies on our website, you may block these at any time. To do so, you can activate 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 website or to use all the functionality provided through our website.
- (iii) The only cookies that are used on our websites are Google Analytics – Our Cookie policy is detailed below.

Google	_ga _gid _gat	Google Analytics help us understand how our customers get to our website, the number of people that visit our site, and how they navigate their way around the site once they're there. We can use this information to improve our visitors' user experience.  Google's Privacy policy is available at  <a href="https://policies.google.com/privacy?hl=en">policies.google.com/privacy?hl=en</a>
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**2.2 Business contacts**

- (a) We, or third parties on our behalf, collect and use the following information about you:
  - (i) your name;
  - (ii) your business postal address;
  - (iii) your business email address;
  - (iv) your telephone number;
  - (v) information about your preferences; and

(vi) any information provided by you when you correspond with us.

(b) How we use your personal information

We will collect, use and store the personal information listed above for the purposes of contacting you in the normal course of doing business with you and/or your employer, dealing with any enquiries from you and also, for business development and marketing purposes, to contact you (including by email or post) with information about our services which you request or which we feel will be of interest to you (including newsletters).

Please see sections 2.3 and 2.4 for more details about how we use your personal information.

(c) Source of personal information. We may receive some of your personal information from third parties, such as marketing agencies and third-party email marketing platforms.

2.3 Whatever our relationship with you is, we may also collect, use and store your personal information for the following additional reasons:

- (a) to deal with any enquiries or issues you have about how we collect, store and use your personal information, or any requests made by you for a copy of the information we hold about you. If we do not have a contract with you, we may process your personal information for these purposes where it is in our legitimate interests for customer services purposes;
- (b) for internal corporate reporting, business administration, ensuring adequate insurance coverage for our business, ensuring the security of company facilities, research and development, and to identify and implement business efficiencies. We may process your personal information for these purposes where it is in our legitimate interests to do so;
- (c) to comply with any procedures, laws and regulations which apply to us – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others to comply, as well as where we are legally required to do so; and
- (d) to establish, exercise or defend our legal rights – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others, as well as where we are legally required to do so.

2.4 Further processing

We will not use your personal information in any way that is incompatible with the purposes set out in this section 2. Please contact us using the details in [section 12](#) if you want further information on the analysis we will undertake to establish if a new use of your personal information is compatible with these purposes.

### 3. Legal basis for use of your personal information

3.1 We consider that the legal bases for using your personal information as set out in this privacy policy are as follows:

- (a) our use of your personal information is necessary to perform our obligations under any contract with you (for example, to comply with the terms of use of our website which you accept by browsing our website); or

- (b) our use of your personal information is necessary for complying with our legal obligations (for example, if you contact us requesting access to personal data we hold about you); or
- (c) where use of your personal information is necessary for our legitimate interests or the legitimate interests of others. Our legitimate interests are to:
  - (i) run, grow and develop our business;
  - (ii) carry out marketing, market research and business development;
  - (iii) provide services to our customers, make and receive payment and provide customer services;
  - (iv) place, track and ensure fulfilment of orders with our suppliers; and
  - (v) carry out internal group administrative purposes.

3.2 If we rely on our (or another person's) legitimate interests for using your personal information, we will undertake a *balancing test* to ensure that our (or the other person's) legitimate interests are not outweighed by your interests or fundamental rights and freedoms which require protection of the personal information. You can ask us for information on this balancing test by using the contact details at [section 12](#)

#### **4. How and why we share your personal information with others**

4.1 We will share your personal information with our group companies where it is in our legitimate interests to do so for internal administrative and business development purposes (for example, ensuring consistent and coherent delivery of our services to our customers, corporate strategy, compliance, auditing and monitoring, research and development, cross-selling within our group and quality assurance).

4.2 We will share your personal information with the following third parties or categories of third parties:

- (a) service providers in relation to events we invite you to attend;
- (b) our other service providers and sub-contractors, including but not limited to production companies, CRM platform providers, payment processors, insurers, warehouse, storage and logistics providers and cloud service providers.

4.3 Any third parties with whom we share your personal information are limited (by law) in their ability to use your personal information for any purpose other than to provide services for us. We will always ensure that any third parties with whom we share your personal information are subject to privacy and security obligations consistent with this privacy policy and applicable laws.

4.4 We will also disclose your personal information to third parties:

- (a) where it is in our legitimate interests to do so to run, grow and develop our business:
  - (i) if we sell or buy any business or assets, we may disclose your personal information to the prospective seller or buyer of such business or assets;
  - (ii) if substantially all of our or any of our affiliates' assets are acquired by a third party, in which case personal information held by us will be one of the transferred assets;

- (b) if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity;
- (c) in order to enforce or apply our terms and conditions or any other agreement or to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity; or
- (d) to protect the rights, property, or safety of ATN, our staff, our customers or other persons. This may include exchanging personal information with other organisations for the purposes of fraud protection and credit risk reduction.

4.5 We may also disclose and use anonymised, aggregated reporting and statistics about users of our website or our goods and services for the purpose of internal reporting or reporting to our group or other third parties, and for our marketing and promotion purposes. None of these anonymised, aggregated reports or statistics will enable our users to be personally identified.

4.6 Save as expressly detailed above, we will never share, sell or rent any of your personal information to any third party without notifying you and, where necessary, obtaining your consent. If you have given your consent for us to use your personal information in a particular way, but later change your mind, you should contact us, and we will stop doing so.

## 5. How long we store your personal information

5.1 We keep your personal information for no longer than necessary for the purposes for which the personal information is processed. The length of time we retain personal information for depends on the purposes for which we collect and use it and/or as required to comply with applicable laws and to establish, exercise or defend our legal rights.

5.2 Where you fill out our online application form for jobs/placements, we retain the personal information provided for 2 years.

## 6. Your rights

6.1 You have certain rights in relation to your personal information. If you would like further information in relation to these or would like to exercise any of them, please contact us via email at [safeandsound@theandpartnership.com](mailto:safeandsound@theandpartnership.com) at any time. You have the following rights:

- (a) **Right of access.** You have a right of access to any personal information we hold about you. You can ask us for a copy of your personal information; confirmation whether your personal information is being used by us; details about how and why it is being used; and details of what safeguards are in place if we transfer your information outside of the European Economic Area ("EEA").
- (b) **Right to update your information.** You have a right to request an update to any of your personal information which is out of date or incorrect.
- (c) **Right to request deletion of your information.** You have a right to ask us to delete any personal information which we are holding about you in certain specific circumstances. You can ask us for further information on these specific circumstances by contacting us using the details in [section 12](#).

We will pass your request on to other recipients of your personal information unless that is impossible or involves disproportionate effort. You can ask us who the recipients are using the contact details in [section 12](#).

- (d) **Right to restrict use of your information:** You have a right to ask us to restrict the way that we process your personal information in certain specific circumstances. You can ask us for further information on these specific circumstances by contacting us using the details in [section 12](#).

We will pass your request onto other recipients of your personal information unless that is impossible or involves disproportionate effort. You can ask us who the recipients are using the contract details in [section 12](#).

- (e) **Right to stop marketing:** You have a right to ask us to stop using your personal information for direct-marketing purposes. If you exercise this right, we will stop using your personal information for this purpose.
- (f) **Right to data portability:** You could have a right to ask us to provide your personal information to a third-party provider of services. This right only applies where we use your personal information on the basis of your consent or performance of a contract; and where our use of your information is carried out by automated means.
- (g) **Right to object.** You have a right to ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our or another person's legitimate interest.

6.2 We will consider all such requests and provide our response within a reasonable period (and in any event within one month of your request unless we tell you we are entitled to a longer period allowed by applicable law). Please note, however, that certain personal information may be exempt from such requests in certain circumstances, for example if we need to keep using the information to comply with our own legal obligations or to establish, exercise or defend legal claims.

6.3 If an exception applies, we will tell you this when responding to your request. We may request you provide us with information necessary to confirm your identity before responding to any request you make.

## 7. Marketing

7.1 We may collect and use your personal information for undertaking marketing by email telephone and post.

7.2 We may send you certain marketing communications (including electronic marketing communications to existing customers) if it is in our legitimate interests to do so for marketing and business development purposes.

7.3 However, we will always obtain your consent to direct marketing communications where we are required to do so by law (for instance if we want to send email marketing to consumers at their personal email addresses).

7.4 If you wish to stop receiving marketing communications, you can contact us by email at [safeandsound@theandpartnership.com](mailto:safeandsound@theandpartnership.com).

## 8. Where we may transfer your personal information

8.1 Your personal information may be used, stored and/or accessed by staff operating outside the EEA working for us, other members of our group, third party partners or suppliers. Further details on to whom your personal information may be disclosed are set out in section 4.

8.2 If we provide any personal information about you to any such non-EEA members of our group or third parties, we will take appropriate measures to ensure that the recipient protects your

personal information adequately in accordance with this privacy policy. These measures may include the following permitted in Articles 45 and 46 of the General Data Protection Regulation:

- (a) in the case of US based entities, entering into European Commission approved standard contractual arrangements with them, or ensuring they have signed up to the EU-US Privacy Shield (see further <https://www.privacyshield.gov/welcome>); or
- (b) in the case of entities based in other countries outside the EEA, entering into European Commission approved standard contractual arrangements with them.

8.3 Further details on the steps we take to protect your personal information, in these cases is available from us on request by contacting us by email at [safeandsound@theandpartnership.com](mailto:safeandsound@theandpartnership.com) at any time.

## **9. Risks and how we keep your personal information secure**

9.1 The main risk of our processing of your personal information is if it is lost, stolen or misused. This could lead to your personal information being in the hands of someone else who may use it fraudulently or make public information that you would prefer to keep private.

9.2 For this reason, we are committed to protecting your personal information from loss, theft and misuse. We take all reasonable precautions to safeguard the confidentiality of your personal information, including through use of appropriate organisational and technical measures. Organisational measures include, implementing internal policies and staff training and ensuring confidentiality obligations are imposed on our employees and third parties. Technical measures include requiring passwords for access to our systems, the use of encryption and anti-virus software and logically separating data.

9.3 In the course of provision of your personal information to us, your personal information may be transferred over the internet. Although we make every effort to protect the personal information which you provide to us, the transmission of information over the internet is not completely secure. As such, you acknowledge and accept that we cannot guarantee the security of your personal information transmitted online and that any such transmission is at your own risk. Once we have received your personal information, we will use strict procedures and security features to prevent unauthorised access to it.

## **10. Links to other websites**

Our website may contain hyperlinks to websites that are not operated by us. These hyperlinks are provided for your reference and convenience only and do not imply any endorsement of the activities of such third-party websites or any association with their operators. This privacy policy only applies to the personal information that we collect or which we receive from third party sources, and we cannot be responsible for personal information about you that is collected and stored by third parties. Third party websites have their own terms and conditions and privacy policies, and you should read these carefully before you submit any personal information to these websites. We do not endorse or otherwise accept any responsibility or liability for the content of such third-party websites or third-party terms and conditions or policies.

## **11. Changes to our privacy policy**

We may update our privacy policy from time to time. Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you in other ways (such as a prominent announcement on our website). Please check back frequently to see any updates or changes to our privacy policy.



## **12. Further questions and how to make a complaint**

- 12.1 If you have any queries or complaints about our collection, use or storage of your personal information, or if you wish to exercise any of your rights in relation to your personal information, please contact [safeandsound@theandpartnership.com](mailto:safeandsound@theandpartnership.com). We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your personal information.
- 12.2 In accordance with Article 77 of the General Data Protection Regulation, you may also make a complaint to the Information Commissioner's Office, or the data protection regulator in the country where you usually live or work, or where an alleged infringement of the General Data Protection Regulation has taken place. Alternatively, you may seek a remedy through the courts if you believe your rights have been breached.

The practices described in this privacy policy statement are current as of May 2018.