

## Who we are?

Our privacy policy applies to the personal data that we at Aspect Communications collect and use. Aspect Ltd (incorporated in England and Wales under company number 3445712) is based at Labs House, 15-19 Bloomsbury Way, London, WC1A 2TH. We are a global events and communications agency, specialising in audio video, production, creative design, message and content development, audience engagement and interaction, presenter scripts and presenter support, logistics and event management, venue sourcing, leadership coaching, video and animation, technical, environment design, rehearsal management, digital expertise.

Aspect operates conscientiously within the requirements of the UK and EU GDPR and other electronic marketing legislation. We work within the principles of fair data processing, namely:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability

This statement (together with our Terms and Conditions), which will be updated at regular intervals, sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us, as a data controller or a data processor.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

## Personal data that we collect about you

When we refer to the term “personal data” in this policy, we mean information that relates to you as an individual. Your personal data may include, for example your name, your contact details, or information you provide when you use our website. In summary, we collect the following information that may relate to you:

### Personal Information

We collect personal information (e.g., name, email address, phone number, etc.) when you:

- Send us an enquiry through our website
- Email us
- Work with us as a customer, supplier or employee

### Other User Information

When you access and use our services, we may collect additional contextual information about your company as well as your design and aesthetics preferences. We do not link this additional data to any other information we collect about you and do not undertake any profiling activity.

## Billing Information

If you contract us for event services, we will require your billing information in order to process the transaction. Billing information includes your name, address, bank details and other information necessary to process the transaction.

## IP Addresses and Cookies

In order to improve our services and to analyse how visitors use our website, we may use technologies, such as cookies to allow us to monitor customer traffic patterns and website usage to help us to develop the design and layout of the website. In many cases, we will not be able to identify you from the information we collect using these technologies.

A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. Cookies are used by many websites and can do several things, e.g., remembering your preferences, recording what you have put in your shopping basket, and counting the number of people looking at a website.

Modern browsers allow you to reject all cookies, whilst some browsers allow you to reject just third-party cookies. For example, in Google Chrome you can refuse all cookies by clicking:

- Click **More > Settings**
- Click **Privacy and Security > Cookies and Other Site Data**
- Select an Option:
  - Allow Cookies
  - Block All Cookies (Not Recommended)
  - Block Third Party Cookies in Incognito
  - Block Third Party Cookies
    - If you block third-party cookies, all cookies and site data from other sites are blocked, even if the site is allowed on your exceptions list.

You may refuse to accept cookies by activating this setting on your browser, however, if you select this setting, you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site. When you log on to our site you will be directed via a banner to our cookies notice.

## How and why, we use your Personal Data

We process your personal information for a variety of reasons:

- To ensure that content from our site is presented in the most effective manner to you and to your computer
- To provide you with information, requested by you, or which we feel would be of interest to you, on our products or services, following your consent to do so.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To cross reference information you have supplied with information supplied by our client for purposes of verifying whether you are an authorised user.
- To notify you about changes to our service.

We may also contact you by email, post or telephone. Please note that where you have provided sensitive data to us, we shall only use data for the purpose for which the data was provided to us.

If you do not want us to use your data in this way, or wish to withdraw your consent for use of the data, you can do so by contacting us via:

- Email: [team@aspect-communications.com](mailto:team@aspect-communications.com)
- Telephone: 0208 282 7575
- Writing: Labs House, 15-19 Bloomsbury Way, London WC1A 2TH

Please note that at the time you contact us, it may be the case that we no longer process, hold or store your personal information, in which case we would advise you of this.

## Your Rights as a Data Subject

The UK and EU GDPR gives you several rights that help you be in control of your personal data, and we will endeavour to make it easy for you to exercise these rights.

### Right to Data Access

We will respond to data requests within one month and will only charge for requests that are manifestly unfounded or excessive. If we have grounds to refuse a request, we will inform the data subject and make them aware of their right to complain to the ICO or to seek civil action – again within one month of receiving the request.

In order to facilitate a request, we will need you to provide the following information:

- Full Name
- An accurate description of the data you would like to access including a date range
- An email address(es) you have used to correspond with us
- Other information that will help us locate your data

For the protection of your personal information, we may also need to verify your identity, by requesting a copy of a current and valid photo ID.

You can contact us via [team@aspect-communications.com](mailto:team@aspect-communications.com)

### Right to be Informed

We strive to ensure that all those engaging with us are informed of our arrangements for processing personal data through this Privacy Statement which is linked to from our email signatures and website home page.

### Right to Rectification

If you believe that we hold incorrect or incomplete information about you, we will endeavour to correct this.

- For personal data obtained directly from a data subject under the legal basis of consent – and obtained indirectly from a data subject under the legal basis of legitimate interest – we will correct any inaccuracies in a data subject’s personal data upon receipt of a request.
- For personal data held under the legal basis of “Contract” or “Vital Interests” or “Legal Obligations” we will endeavour to correct the data upon request but may not be able to do so if changing the data may conflict with our legal obligations or be disadvantageous in a future legal action.

In cases where we cannot rectify the data for these reasons, we shall inform the data subject and make them aware of their right to complain to the ICO or to seek civil action.

## Right to Erasure

We will retain your information for as long as is required for us to fulfil the purposes for which it was initially supplied:

- For personal data obtained directly from a data subject under the legal basis of consent – and obtained indirectly from a data subject under the legal basis of legitimate interest – we will erase a data subject's personal data upon receipt of a request / opt-out notification.
- For personal data held under the legal basis of "Contract" or "Vital Interests" or "Legal Obligations" we will endeavour to erase data upon request but will not be able to do so if holding the data is necessary to fulfil our legal obligations or may be necessary as evidence in a future legal action involving us.

In cases where we cannot erase the data for these reasons, we shall inform the data subject and make them aware of their right to complain to the ICO or to seek civil action.

## Right to Restrict Processing

Individuals have the right to restrict the processing of their personal data in certain circumstances. This means that an individual can limit the way that an organisation uses their data.

- For personal data obtained directly from a data subject under the legal basis of consent – and obtained indirectly from a data subject under the legal basis of legitimate interest – we will restrict the processing of a data subject's personal data upon receipt of a request / opt-out notification.
- For personal data held under the legal basis of "Contract" or "Vital Interests" or "Legal Obligations" we will endeavour to facilitate the requested restriction upon request but will not be able to do so if restricting the processing of the data prevents us from fulfilling our legal obligations, or the current processing of the data may be necessary as evidence in a future legal action involving us.

In cases where we cannot restrict the processing of the data for these reasons, we shall inform the data subject and make them aware of their right to complain to the ICO or to seek civil action.

## Right to Object

For personal data obtained directly from a data subject under the legal basis of consent – and obtained indirectly from a data subject under the legal basis of legitimate interest – we will cease to process a data subject's personal data upon receipt of a request / opt-out notification.

## Right to Portability

For personal data obtained directly from a data subject under the legal basis of consent – we shall provide, upon receiving a request, the data that we hold in a standard, widely accessible format.

## Right to Withdraw Consent

Where we process your personal data based on your consent, you can withdraw this consent at any time, and we will cease processing your personal data. This does not affect the legality of any processing carried out before you withdrew your consent.

## Securing your Personal Data

We use physical, electronic, and procedural safeguards to protect personal information. Our IT arrangements aspire to “Data Protection by Design” and should be able to detect a significant data breach. Where such a breach could result in discrimination, damage to reputation, financial loss, loss of confidentiality or any other significant economic or social disadvantage we will notify the ICO. Where a breach is likely to result in a high risk to the rights and freedoms of individual data subjects, we will also notify those concerned directly and at the earliest practical opportunity. We shall then fully investigate a data breach and implement corrective action to prevent recurrence.

By using our services or providing personal information to us, you are consenting to Aspect communicating with you electronically regarding security, privacy, and administrative issues related to your use of our services. We may post a notice on our website if a security breach occurs. In these circumstances, we may also send an email to you at the email address you have provided.

Data transmissions over the Internet are not 100% secure. Consequently, we cannot guarantee or warrant the security of any information you transmit to us, and you do so at your own risk. Once we receive your transmission, we use reasonable efforts to ensure security on our systems.

Any information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

## Sharing and Disclosure of Personal Data

In order to provide our services effectively, we may sometimes be required to share your data with third parties. Where any of your data is required for such a purpose, we will take reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights.

Where there is a requirement to transfer any personal data outside of the UK or EEA, we will take reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK or EEA and under the GDPR.

We may also need to disclose your personal information under the following circumstances:

- If we or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms and Conditions and other agreements; or to protect the rights, property, or safety of our clients, customers or others.
- Our site may, from time to time, contain links to and from the websites of our partner networks, clients, affiliates or other external websites. If you follow a link to any of these websites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for these privacy policies. Before you submit any personal data to our site, you may want to check the policies of the clients, for whom we are collecting the data, and whom for your purposes is the data controller. In the absence of any details being listed on our site, you may contact us via the details referenced above.



## **Updates to this Privacy Policy**

Aspect reserves the right to revise, modify, or update this statement if there is a change to how we use your personal data or the information we provide needs to change in accordance with data protection laws. Any new updates to our privacy policy will be updated on our website accordingly.

## **Contacting Us**

If you have a privacy related concerns regarding how we are using your data, or this statement, you may contact us via [team@aspect-communications.com](mailto:team@aspect-communications.com)