

ARENA PARTNERSHIP PRIVACY POLICY

At Arena Partnership Ltd, Trumpeter House, Trumpeter Rise, Long Stratton, NR15 2DY we are committed to protecting and respecting your privacy.

We are registered with the ICO with registration number Z970774X.

This privacy policy, together with our websites, terms of use, client agreements and any other documents entered into between us, sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

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

SECTION A

This covers our privacy policy for visitors to our marketing websites (www.tptracker.com or www.arenapartnership.co.uk) or those who contact us to enquire about the software and services we provide.

SECTION B

This covers our privacy policy for our clients or customers who are registered as users of our TPTracker web-based software (www.tptracker.co.uk/login).

CHANGES

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check here to see any updates or changes.

FEEDBACK

We welcome questions, comments and requests regarding this privacy policy:

EMAIL info@tptracker.com

POST Arena Partnership Ltd, Trumpeter House, Trumpeter Rise, Long Stratton, NR15 2DY

PHONE 08456 432 872

A. FOR VISITORS TO OUR COMPANY WEBSITES OR THOSE ENQUIRING ABOUT OUR SERVICES

We are the data controller, meaning we are responsible for and control the processing of your personal data.

1. Information we may collect from you

We may collect, use, store and transfer different kinds of personal data about you:

1.1 Information you give us

You may give us information about you by filling in forms on our website or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you search for a product or service. The information you give us may include your name, work address, job title, email address and phone number.

1.2 Information we collect about you

With regard to each of your visits to our website we may automatically collect the following information:

1.2.1 Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and

1.2.2 Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number; this information helps us to build a profile of our users. Some of this data will be aggregated or statistical, which means that we will not be able to identify you individually.

2 Communications

We may monitor communications with you (such as telephone conversations and emails) for the purpose of quality assurance, training, fraud prevention and compliance. We will keep a record of email communications but will not record any telephone conversations.

3. Uses made of the information

3.1 We use the information you give to us to:

3.1.1 Provide you with the information, products and services that you request from us;

3.1.2 Provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;

3.1.3 Notify you about changes to our products and services; and

3.1.4 Ensure that content from our website is presented in the most effective manner for you and for your computer.

3.2 We use the information we collect about you to:

3.2.1 Administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;

3.2.2 Improve our website to ensure that content is presented in the most effective manner for you and for your computer;

3.2.3 Support our efforts to keep our website safe and secure; and

3.3 Our lawful basis for processing your data is:

The necessity for our legitimate interests for running our business, provision of services and network security.

3.4 We may share your personal information with:

3.4.1 Any employee of Arena Partnership Ltd;

3.4.2 Selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- Analytics and search engine providers that assist us in the improvement and optimisation of our websites.

3.5 In the event that we sell any business or assets:

We may disclose your personal data to the prospective buyer of such business or assets and the personal data held by us about our customers will be one of the transferred assets.

3.6 If we are under a duty to disclose or share your personal data:

We may disclose your personal data in order to comply with any legal obligation, or to protect the rights, property, or safety of our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection.

4. Cookies

A cookie is a small text file which is placed onto your computer (or other electronic device) when you access our website.

4.1 This website uses tracking software to monitor its visitors to better understand how they use it. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to your computer's hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information. You can read Google's privacy policy here for further information <http://www.google.com/privacy.html>.

4.2 If you use this website, we will assume that you consent to our use of cookies for the purposes described in this Privacy Policy.

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of this website.

5 Where we store your personal data

All our websites and web-based software are hosted within mainland UK. We never transfer data elsewhere.

6 Security

We will always strive to protect your personal data, though we cannot guarantee the security or integrity of your data transmitted to our website and you acknowledge that any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to prevent unauthorised access.

7 Data Retention

7.1 Data files held on individual PCs, laptops or phones

It is Arena Partnership's policy not to store any data files containing personal data on any devices other than the Arena Partnership server.

7.2 Data files held on the Arena Partnership server

Each January, any files containing personal data that are more than 12 months old will be deleted. This annual clean-up is scheduled as a recurring event in Arena Partnership's diary system and is fully recorded for audit purposes.

7.3 Paper documents

It is Arena Partnership's policy not to store any documents containing personal data for longer than 3 months. All such documents will be disposed of using a 3rd Party, on-site, secure, data shredding contractor who provides a written record.

8 Third Party Links

Our website may, from time to time, contain links to and from the websites of partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

9 You have the right to:

9.1 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.

9.2 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.

9.3 Request erasure of your personal data

You can 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.

9.4 Object to processing of your personal data

You can object 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.

9.5 Request restriction of processing of your personal data

You can 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.

9.6 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.

9.7 Withdraw consent at any time

You can do this 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 professional services to you. We will advise you if this is the case at the time you withdraw your consent.

9.8 Complain

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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance using the details below.

B. FOR REGISTERED USERS OF OUR TPTracker SOFTWARE

We are the data controller, meaning we are responsible for and control the processing of your personal data as a registered user of our TPTracker software.

10. Information we will collect from you

We will collect, use, store and transfer personal data about you as a customer and registered user of our web-based TPTracker software:

10.1 Information you give us

You will give us information about you by registering as a user of TPTracker software. The information you give us may include your name, company address, e-mail address, phone number and job title.

10.2 Information we collect about you

With regard to your visits to TPTracker, the software will automatically record information about records that you create and changes that you make to data fields within the software.

11. Information about other individuals

TPTracker software which you access under contract from us, is provided for the purpose of storing and analysing data and records relating to your contacts. For these records, Arena Partnership acts only as the Data Processor and you are legally the Data Controller.

12. Communications

We may monitor communications with you (such as telephone conversations and emails) for the purpose of quality assurance, training, fraud prevention and compliance. We will keep a record of email communications but will not record any telephone conversations.

13. Uses made of the information

13.1 We use information you give to us to:

13.1.1 Carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;

13.1.2 Provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;

13.1.3 Notify you about changes to our products and services; and

13.1.4 Ensure that content from TPTracker is presented in the most effective manner for you and for your computer.

13.2 We use information we collect about you to:

13.2.1 Administer our services and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;

13.2.2 Improve our services to ensure that content is presented in the most effective manner for you and for your computer;

13.2.3 Support of our efforts to keep our website safe and secure; and

13.3 Our lawful basis for processing your data is:

13.3.1 The performance of a contract with you;

13.3.2 The necessity for our legitimate interests for running our business, provision of services and network security.

13.4 We may share your personal information with:

13.4.1 Any employee of Arena Partnership Ltd;

13.4.2 Selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- Analytics and search engine providers that assist us in the improvement and optimisation of our websites.

13.5 In the event that we sell or buy any business or assets

We may disclose your personal data to the prospective seller or buyer of such business or assets and the personal data held by us about our customers will be one of the transferred assets.

13.6 If we are under a duty to disclose or share your personal data

We may disclose your personal data in order to comply with any legal obligation, or to protect the rights, property, or safety of our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection.

14 Cookies

Our web-based software provided under contract to you does not include any cookies.

15 Where we store your personal data

All our websites and web-based software are hosted within mainland UK. We never transfer data elsewhere.

16 Security

We will always do our best to protect your personal data, though we cannot guarantee the security or integrity of your data transmitted to our website and you acknowledge that any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to prevent unauthorised access and ensure your personal data and the data relating to your contacts which is held in TPTracker cannot be accessed by unauthorised users.

17 Data Retention

17.1 Data files held on individual PCs, laptops or phones

It is Arena Partnership's policy not to store any data files containing personal data on any devices other than on the Arena Partnership server.

17.2 Data files held on the Arena Partnership server

Each January, any files containing personal data that are more than 12 months old will be deleted. This annual clean-up is scheduled as a recurring event in Arena Partnership's diary system and is fully recorded for audit purposes.

17.3 Data files held in TPTracker software

Personal data on contacts held in TPTracker software is owned and controlled by the licensee. The data will remain in TPTracker until the licensee deletes or pseudonymises the data. If the licensee's licence expires, the TPTracker site will be shut down, which will permanently delete all the data held in the site.

17.4 TPTracker software back-up files

The TPTracker database and all files held in TPTracker are backed up each night. Each backup is retained for one month and then over-written with a newer backup, permanently destroying the older copy.

17.5 Paper documents

It is Arena Partnership's policy not to store any documents containing personal data for longer than 3 months. All such documents will be disposed of using a 3rd Party, on-site, secure, data shredding contractor who provides a written record.

18 You have the right to:

18.1 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.

18.2 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.

18.3 Request erasure of your personal data

You can 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.

18.4 Object to processing of your personal data

You can object 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.

18.5 Request restriction of processing of your personal data

You can 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.

18.6 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.

18.7 Withdraw consent at any time

You can do this 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 professional services to you. We will advise you if this is the case at the time you withdraw your consent.

18.8 Complain

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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance using the details below.