

Data Protection and Retention Policy for the HUBDOT Network

IMPORTANT INFORMATION AND WHO WE ARE

We are the Hub Dot London Limited of 74 Perrymead Street, London SW6 3SP trading as HUBDOT. For the purposes of data protection legislation, we will be the “controller” or “data controller” of all Data held in respect of this Policy.

HUBDOT (“we”/“us”/“our” etc) is committed to protecting the privacy of all personal data collected in the course of our business, this includes your data. We will at all times ensure that the minimum amount of personal data is kept, and for no longer than necessary, for us to meet our document retention objectives and data protection obligations.

This Data Protection and Retention Policy sets out how we will collect and retain personal data in relation to the Network and is an important part of our data protection compliance processes. It should be read alongside our other Data Protection and Retention Policies, which can be found on the HUBDOT website.

This Policy applies only to our use of your Data, whether or not including any Data collected with respect to the Network. It does not extend to any websites that can be accessed from the Network including, but not limited to, any links we may provide to social media websites. We are not responsible for the content and practices of these websites and please note in particular that that we have no control over any use of cookies on these websites. Users You are advised to read the privacy policy or statement of these other websites prior to using them.

We will always comply with relevant Data Protection Legislation (including the Data Protection Act 1998 (“DPA”) and General Data Protection Regulation (“GDPR”) as applicable) when dealing with your personal data. Further details on the DPA and GDPR can be found at the Information Commissioner’s Office website (www.ico.gov.uk).

HUBDOT reserves the right to change this Policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the HUBDOT website and you are deemed to have accepted the terms of the Policy on your first use of the Network following the alterations. We will provide an alert when this occurs. Please check back frequently to see any updates or changes to our Policy.

All breaches of this Policy should be reported to our Data Protection Administrator Catalina Silva Griffin at catalina@hubdot.com, to whom all queries regarding this Policy should also be addressed.

WHAT DATA DO WE COLLECT?

Personal data 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 different kinds of personal data about you which we have grouped together as follows:

- (i) **Identity Data** includes first name, last name, and title.
- (ii) **Contact Data** includes your address (your city of residence) and email address.

- (iii) **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- (iv) **Usage Data** includes information about how you use our Website.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Through our Network you can sign up to our Newsletter and our Events, if you do so you should read the relevant data protection and retention policies. These can be found on the HUBDOT website, and you will also be prompted to them when signing up.

We only collect Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) if you share it with us as part of your Story.

HOW WE COLLECT PERSONAL DATA

We use different methods to collect data from and about you including through:

1. **Direct interaction.** You may give us your Identity and Contact Data by filling in the sign up forms. You may also give us Special data if you include this in the 'Story' section of the sign up forms.
2. **Automated technologies or interactions.** As you interact with the Network, we may automatically collect Technical and Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.

Cookies

We use cookies on our Network, which amongst other things, help us to improve your experience of our Network and to ensure that it performs as you expect it to. Cookies are text files containing small amounts of information, which are downloaded to your computer or mobile device by websites that you visit. They can improve your experience of using a website, for example, by remembering your preference settings and tracking your use of a website so that it can be improved to meet your needs.

Websites must get consent to send cookies to your computer or mobile device unless the cookies are strictly necessary to provide services to you. We ask Users of the Network if they would like to accept cookies when they visit the Network. You have the right to refuse cookies. Although, please do remember that if you do not consent to our functionality cookies, parts of our Network will not work. For example, you will not be able to watch our videos. For this reason we will occasionally send you prompts which allow you to consent to a cookie you have previously rejected.

Unless the cookie is a strictly necessary cookie, you can withdraw your consent to our cookies at any time even if you have previously consented.

You can also set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies.

WHY WE COLLECT PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a User of the Network	(i) Identity (ii) Contact	Performance of contract with you (to provide you with the newsletter)
To manage our relationship with you, which will include notifying you about changes to our data retention and protection policy	(i) Identity (ii) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this Network (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(i) Identity (ii) Contact (iii) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant Network content to you and measure or understand the effectiveness of the content we serve to you	(i) Identity (ii) Contact (iii) Technical (iv) Usage	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our Network, products/services, customer relationships and experiences	(iv) Technical (v) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

We do not do targeted marketing, any recommendation of a third party on our Website is for our whole community. We do not target our recommendations at individuals.

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 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.

WHEN WILL WE SHARE YOUR DATA?

We may have to share your personal data with the parties set out below for the purposes set out in the table above. Parties we may have to share your data with include:

- (a) Mailchimp (view their privacy policy here <https://mailchimp.com/legal/privacy/>)
- (b) Touchpoint (view their privacy policy here <http://www.touchpoint.marketing/privacy>)

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Third party links

The Network may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Network, we encourage you to read the privacy notice of every website you visit.

INTERNATIONAL TRANSFERS

The Data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. We will always ensure that appropriate safeguards are in place to ensure the privacy of your Data in accordance with the standards set out in relevant Data Protection Legislation.

LEAVING THE NETWORK

You can ask us to remove your profile from the Network at any time by contacting us at any time.

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, volunteers, 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.

HOW LONG WE KEEP 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.

Our Data Protection Administrator will monitor and enable our process of identifying which records and information have met their required retention period and will supervise their destruction.

In general we will retain your data until you unsubscribe from the Network. Once you have unsubscribed we may retain your data for up to 6 months to ensure that your data has been deleted or anonymised in all locations. We may retain your data for more than 6 months should we be required to do so in order to comply with our legal obligations. Our legal obligations as referred to in this Policy are our statutory obligations and obligations arising from any other binding law.

We will delete or anonymise your data once you have unsubscribed, provided that this does not conflict with our legal obligations.

YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. If you wish to exercise any of these rights, please contact us.

In particular, 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.

In addition, you have the right to **take any complaints** about how we process your personal data to the **Information Commissioner**:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

<https://ico.org.uk/concerns/>

0303 123 1113.

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.