

PRIVACY NOTICE

Influence Digital is required under the General Data Protection Regulation 2016 (the “GDPR”) to notify you of how it collects and uses your personal data. This Notice sets out the basis on which any personal data we collect from you, or that you provide to us, why Influence Digital needs it, how Influence Digital will use it, in respect of your relationship with us as a digital and social media agency or employment and what protections Influence Digital has in place to keep your data secure.

“Influence Digital” refers to Influence Digital Ltd of 40 Whitfield Street London W1T 2RH.

“You” means any individual, business / organisation or employee whose personal data is controlled and / or processed by Influence Digital.

This Privacy Notice applies to any individuals, all employees and enquiries made to Influence Digital concerning your interaction with any of our services provided, potential future and actual working relationship with us.

Influence Digital acts as a “data controller” and “data processor”, which means that Influence Digital is responsible for deciding how to hold and use personal data about you.

We will take all reasonably necessary steps to ensure that your data is treated securely and in accordance with this Privacy Notice.

WHAT PERSONAL DATA DOES INFLUENCE DIGITAL COLLECT FROM AND ABOUT YOU?

Influence Digital may collect, store, and use the following categories of personal data about you, which will vary in nature depending on the basis of Influence Digital’s relationship with you e.g. as a digital and social media agency or employer, and the purpose for which Influence Digital uses such data;

- **Personal contact details** such as your interest in working with us, your name, title, home and work addresses, telephone numbers, email addresses, emergency contact information, including next of kin. If you interact with digital and social media content including, but not limited to, social media pages, websites, online competitions, promotions or survey’s as any part of Influence Digital’s client services rendered, for Influence Digital’s own purposes or otherwise, we may collect your name and relevant contact information and any other personal information you choose to give us. If you contact us online, we may keep a record of your e-mail or other correspondence, and if you call us by telephone, Influence Digital’s account management team may record pertinent information relating to business opportunities, such as budget information and sign off processes regarding the call for account management reasons.
- **Personal data about you** such as date of birth, gender, nationality and/or citizenship status, race, marital status, health information including mental health, information about criminal convictions or offences, family, lifestyle and social circumstances, if relevant to your relationship with Influence Digital (for example where Influence Digital liaises with third parties for anonymised personal data made public by you for audience targeting in online advertising and

/ or on your behalf in respect of your reputation or reliability where required). If you interact with digital and social media content including, but not limited to, social media pages, websites, online competitions, promotions or survey's as any part of Influence Digital's client services rendered, for Influence Digital's own purposes or otherwise, we may also collect details of your visits to websites (including, but not limited to, traffic data, location data and weblogs) whether this is required for our own purposes or otherwise, and of the resources that you access. We use third party technology services, such as Google Analytics to administer these services. We collect details of websites you visited before you use a link to our websites, pages visited in websites, online competitions or survey's, and time spent on each page. We may collect information about your computer (or mobile device / tablet) including, where available, your IP address, operating system, device location, browser type, cookie identification numbers, for system administration and marketing purposes.

- **Personal data obtained from other sources.** We might also receive your personal data from a business / organisation whom we provide digital and social media services for or from third party services who collect information about you on Influence Digital's behalf. This includes: if we are provided personal data, we will process that information on a business / organisation's behalf using a third party service such as Survey Monkey, Facebook / Twitter / Google AdWords or similar digital advertising platforms. If you provide feedback on a business / organisation that we work with via social media, such as a Twitter survey, the feedback, but not your personal data, will be processed by Twitter and passed on.
- **Personal data which may identify you** such as your driving licence, passport, utility bill(s), electronic signatures, photographs, videos or voice.
- **Personal data to process any payments Influence Digital may need to make to you** such as bank account details, tax status information, National Insurance number, VAT numbers and / or unique tax number, or details of any interest in and connection with any intermediary through which Influence Digital's services are supplied.
- **Personal data relating to your work such as** your career history including work /engagement/project/employment records, job titles, work history, working hours, holidays, training records, details of the projects / engagements you are or have been involved in, including contracts.
- **Personal data relating to your relationship with Influence Digital** such as Terms of Business or Employment, copies of right to work documentation, references, samples of work, information included in a CV or cover letter or as part of the process of applying for a job or material provided to us for use in any of our digital and social media services (in any form including without limitation, images, video and documents).

HOW DOES INFLUENCE DIGITAL OBTAIN YOUR PERSONAL DATA?

Most of the personal data Influence Digital collects, stores and uses about you will be provided directly by you (or third parties authorised on your behalf) including, but not limited to;

- Where you provide Influence Digital with your data during the course of your dealings with Influence Digital and its employees, and / or you interact with digital and social media content including, but not limited to, social media pages, websites, online competitions, promotions or

survey's as any part of Influence Digital's services rendered, for Influence Digital's own purposes or otherwise.

- As part of and during the process of your joining Influence Digital as a client or employee.
- Where data is collected from your employees, other companies with whom you may have a relationship such as other agencies, companies with whom you work or organisations with whom you have had dealings and information or service providers;

Other information about you may be obtained by Influence Digital from;

- Public sources or social media (e.g. Facebook, Twitter, LinkedIn, Instagram).
- Personal information provided by you to businesses / organisations and affiliated third parties with whom we provide digital and social media services for.

WHY DOES INFLUENCE DIGITAL NEED TO COLLECT AND USE YOUR PERSONAL DATA

Influence Digital uses your personal data for a number of reasons, depending on your relationship with Influence Digital e.g. as a digital and social media agency or employee. The situations in which Influence Digital may use your personal data are set out below.

In general, irrespective of whether you are an individual, business / organisation, an employee of Influence Digital's or otherwise, Influence Digital may collect your data, for;

- Customer experience;
 - To allow you to participate in interactive features on a business / organisations behalf, for Influence Digital's own purposes or otherwise, including, but not limited to social media pages, websites, online competitions, promotions and survey's, when you choose to do so.
 - To control and process personal data obtained from websites and social media channels or other avenues, to which you have consented for use of your information to be used, for the purposes of digital and online advertisement or marketing on a business / organisations behalf, Influence Digital's own purposes or otherwise;
 - We may disclose your personal information to any member of Influence Digital's team including holding your data on central / shared systems and for sharing with the relevant business / organisation as part of our account services via an encrypted document for the controlling and processing of this data. Influence Digital's team means all full-time, part-time, contract or freelance resource under the employ of Influence Digital.
 - You can opt out and object to businesses / organisations that Influence Digital works on behalf of from sending you electronic marketing information or contacting you over the phone at any time. See the privacy policies provided by that specific business / organisation for details.
 - To offer you a better experience we tailor and track Influence Digital's digital and social media marketing (for example, paid social media advertisements or reporting on delivery of projects for businesses / organisations, Influence Digital's own purposes or otherwise) and links from websites or channels.
 - To notify you about changes to Influence Digital's services.

- To communicate with any third parties which are required in the delivery of digital and social media marketing services on a business / organisations behalf, Influence Digital’s own purposes or otherwise;
 - When you give consent to use your personal data, some of the personal data you provide is processed and stored by relevant third parties and may also be shared with other companies for the purposes of providing services, including, but not limited to, the operation and maintenance of social media pages, websites, online competitions, promotions or survey’s.
 - Some of these third parties may be based outside of the European Economic Area (“EEA”).
 - When we transfer your information outside of the EEA in this way, we take steps to ensure that your personal information will be subject to one or more appropriate safeguards set out in data protection law. Including imposing contractual obligations on the recipient of your personal information or ensuring that the recipients are subscribed to ‘international frameworks’ that aim to ensure adequate protection, such as the US ‘Privacy Shield’ scheme.
 - These third parties can be categorised, but are not limited to, as follows;

Recipient / Relationship to us	Industry Sector (& sub-sector)	Location
Agency Clients	Media (advertising & PR departments of various industries including, but not limited to, travel, film and entertainment and services sectors)	EEA
Cloud software system providers, including database, email and document management providers	IT (Cloud Services)	EEA & USA
Software providers, including open graph API solutions to which we can customise to fit your needs	IT (Software Providers)	EEA & USA
Social Media Platforms	Media (Social Media)	EEA & USA

- Business management and planning, including communicating with you when you have provided your contact details through Influence Digital’s website.
- Dealing with legal disputes involving you and / or Influence Digital employees.
- Equal opportunities monitoring.
- Updating client or employee records.
- To monitor and keep records of Influence Digital’s communications with you and Influence Digital employees.

- For some direct communications mainly for the purpose of promoting projects in which Influence Digital’s clients are involved.
- Accounting and auditing of Influence Digital’s business.
- To comply with any obligations under employment law and / or under the Employment Agency Standards.

If you are a client, the controlling and / or processing of your personal data will be necessary to fulfil Influence Digital’s obligations to you as your digital and social media agency, without limitation, pursuant to Influence Digital’s Terms of Business with you or to enable Influence Digital to take steps to provide our digital and social media services to a business / organisation at your request prior to agreeing its Terms of Business, including in the following (non-exhaustive) ways;

- Administering your initial enquiry or brief for your business requirements and to enable Influence Digital to provide digital and social media services to you.
- To communicate with you regarding your enquiry, including Influence Digital’s team sending over or presenting further information regarding the relevant digital and social media services available;
 - We may disclose your personal information to any member of Influence Digital’s team including holding your data on central / shared systems for processing your request for further information and any enquiry made by your business for a project brief or interest in retaining Influence Digital’s services over an extended period. Influence Digital’s team means all full-time, part-time, contract or freelance resource under the employ of Influence Digital.
- To communicate with any third parties to provide or deliver solutions to enquiries, briefs or for your business requirements;
 - When you give your personal data to Influence Digital, some of the personal data you provide will need to be given to and processed and stored by relevant third parties and may also be shared with other companies for the purposes of providing services to you or directly to your customers, including but not limited to, the operation and maintenance of social media pages, websites, online competitions, promotions or survey’s.
 - Some of these third parties may be based outside of the EEA.
 - When we transfer your information outside of the EEA in this way, we take steps to ensure that your personal information will be subject to one or more appropriate safeguards set out in data protection law. Including imposing contractual obligations on the recipient of your personal information or ensuring that the recipients are subscribed to ‘international frameworks’ that aim to ensure adequate protection, such as the US ‘Privacy Shield’ scheme.
 - These third parties can be categorised, but are not limited to, as follows;

Recipient / Relationship to us	Industry Sector (& sub-sector)	Location
Cloud software system providers, including database, email and document management providers	IT (Cloud Services)	EEA & USA

Software providers, including open graph API solutions to which we can customise to fit your needs	IT (Software Providers)	EEA & USA
Social Media Platforms	Media (Social Media)	EEA & USA

- To provide brand partnership opportunities, where marketing interests may complement one another.
- To promote Influence Digital’s business and services;
 - To send marketing correspondence about Influence Digital’s services, similar to those you have previously bought from us or registered an interest in. You can opt out and object to Influence Digital sending you electronic marketing information or contacting you over the phone at any time. See ‘YOUR RIGHTS IN CONNECTION WITH YOUR PERSONAL DATA’ for details.
 - To contact you with targeted advertising delivered online through social media and other platforms. You may receive advertising based on information about you that we have provided to the platform or because at Influence Digital’s request, the platform has identified you as having similar attributes to the individuals whose details it has received from us. To find out more, please refer to the information provided in the help pages of the platforms on which you receive advertising from us.
- Determining the terms of our agency client agreement with you.
- Keeping you up to date and reporting to you.
- To demonstrate our working relationship together, creating case studies or profiles on Influence Digital’s website or agreed publicity sent to third party industry publications such as ‘The Drum’ so that Influence Digital can demonstrate its work for future prospective clients.
- To manage your social media channels or those of your partners.
- To make payments on your behalf for any third party service that is required for the delivery of an agreed scope of work, to deduct Influence Digital costs and to account to you.
- To make arrangements for the termination of any agency client relationship.

If you are an employee, the controlling and / or processing of your personal data will be necessary to fulfil Influence Digital’s obligations to you as your employer including, without limitation;

- To make a decision about whether Influence Digital takes you on as an employee.
- To determine the terms of your employment.
- To contact you.
- To fulfil its obligations to you as your employer including payment obligations.

Change of purpose

Influence Digital will only use your personal data for those situations listed above, unless Influence Digital reasonably considers that it needs to use it for another reason and that reason is compatible with the original purpose. If Influence Digital needs to use your personal data for an unrelated purpose, you will be notified you and Influence Digital will explain the legal basis which allows it to do so.

WHAT ARE THE LEGAL GROUNDS FOR CONTROLLING AND PROCESSING YOUR PERSONAL DATA?

Under GDPR, Influence Digital must identify a lawful basis for controlling and / or processing of your personal data. That basis may vary according to the nature of the personal data controlled and / or processed, the individual to whom it relates and the nature of the controlling and / or processing. These legal grounds will be relied upon to control and / or process your data. Some of the legal grounds for controlling and / or processing will overlap and there may be several grounds, which justify Influence Digital's use of your personal data. These obligations are;

- **Performance of a contract, agreed project and / or provision of digital or social media services for you, if any.** If you are a business / organisation or employee or other individual with a direct contractual relationship with Influence Digital, Influence Digital is entitled to control and / or process the personal data it requires in order to fulfil its obligations to you under such contract or requested project for digital and social media services.
- **The legitimate interests of Influence Digital or a third party.** Influence Digital may control and / or process your personal data on the lawful basis that it is in its legitimate interests and/or those of a third party to do so. This will primarily apply when Influence Digital provides services to its clients and/or in the effective and management of its business. The proper performance of its role in providing digital and social media services to its clients, the effective management of its business and in order to comply with Influence Digital's legal obligations include;
 - Contacting individuals and organisations relevant to Influence Digital's work and its clients, which may involve the use of your personal data.
 - Reviewing correspondence and documents that have been disclosed to Influence Digital, its clients and third parties which may contain your personal data and disclosing such correspondence and documents to various parties in furtherance of your objectives.
 - Instructing third parties on behalf of its clients.
 - Engaging suppliers and personnel.
 - Ensuring that its systems and premises are secure and running efficiently.
 - For regulatory and legislative compliance.
 - For audit and reporting.
 - For general business development purposes.
 - For insurance purposes.
 - For receiving payments and making payments.
 - To allow for all of the above, the secure management and storage of your personal data within its IT and hard copy filing systems.
- **Compliance with legal obligations to which Influence Digital is subject.** In certain circumstances Influence Digital may be obliged to control and / or process your personal data to comply with its legal obligations including, without limitation, controlling and / or processing required for accounting and tax purposes. For detailed information on these legal obligations, please see the Information Commissioner's website (see below).

Please note that Influence Digital may control and / or process your personal data, without your knowledge or consent, where this is required or permitted by law.

SPECIAL CATEGORY PERSONAL DATA

Some of data held by Influence Digital may fall within a so-called "special category" of more sensitive personal data such as;

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records.
- Genetic information and biometric data.

Influence Digital will obtain your explicit consent to any controlling and / or processing of such data unless Influence Digital is not required to do so by law. Influence Digital needs to have a further legal ground for collecting, storing and using this type of personal data. Influence Digital may control and / or process special categories of personal data in the following circumstances;

- **With your explicit consent;**
 - To collect, hold and disclose data concerning your health to third parties e.g. where disclosure of your health records or a medical examination is a condition of your employment with Influence Digital.

Where Influence Digital is controlling and / or processing such data with your consent, you have the right to withdraw such consent at any time.

- **Controlling and / or processing is necessary to protect your vital interests or those of another natural person.** To collect, hold and disclose data concerning your health to third parties e.g. where disclosure of your health records is necessary for a medical emergency.
- **The personal data Influence Digital wishes to process has manifestly been made public by you.**
- **Controlling and / or processing is necessary for the establishment, exercise or defence of legal claims or whenever Courts are acting in their judicial capacity.**
- **Controlling and / or processing is necessary for reasons of substantial public interest.**

WHEN DOES INFLUENCE DIGITAL SHARE YOUR PERSONAL DATA WITH OTHER ORGANISATIONS OR INDIVIDUALS?

Influence Digital may have to share your personal data with third parties, including third-party service providers. Influence Digital requires such third parties to respect the security of your data and to treat it in accordance with GDPR.

Influence Digital will not share or use your personal data in a way you would not expect under its contractual relationship with you.

Influence Digital may also share your personal data with third parties where required by law or where IT has another legitimate interest in doing so.

TRANSFERRING YOUR PERSONAL DATA OUTSIDE THE EU

Influence Digital is based in the UK, but sometimes it may be necessary to transfer your personal data outside the EU. A common example are the virtual servers located outside the EU, which Influence Digital uses for the management of our central / shared systems and storage of your personal data, hosted by an American company called Linode who are contractually bound to being GDPR compliant under the EU Contract Model. For other examples, refer to 'WHY DOES INFLUENCE DIGITAL NEED TO COLLECT AND USE YOUR PERSONAL DATA'.

Influence Digital will seek and secure your explicit consent for transferring your personal data outside the EU in circumstances where (a) the transfer is not necessary for the fulfilment of Influence Digital's obligations to you under any relevant agreement; (b) the EU Commission has not made an adequacy decision in respect of the country in which the recipient of the personal data is based; (c) the transfer of the personal data is not subject to appropriate safeguards as set out in Article 46 of the GDPR; (d) there are no binding corporate rules in place; or (e) no other derogation is applicable.

WHAT IF YOU DO NOT WANT TO SHARE YOUR PERSONAL DATA WITH INFLUENCE DIGITAL?

If you fail to provide certain information when requested, Influence Digital may not be able to honour its obligations to you, whether contractual, legal or otherwise, such as paying you or, if you are a business / organisation, providing digital and social media services to you. Refer to 'YOUR RIGHTS IN CONNECTION WITH YOUR PERSONAL DATA' to find out more about how you can opt out of marketing.

HOW DOES INFLUENCE DIGITAL KEEP YOUR DATA SECURE?

The transmission of information via the internet is not completely secure, and although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted, therefore any transmission is at your own risk. Influence Digital has 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, Influence Digital limits access to your personal data to those employees, contractors and other third parties who have a business need to know. They will only process your personal data on Influence Digital's instructions. All the information you provide to Influence Digital is stored on our secure servers via central / shared systems or under Influence Digital employee email accounts provided by Google services, whereby each user has 2-Step Authentication for added security. Where only those under the employ of Influence Digital have a password, which enables access to certain parts. Employees are responsible for keeping that password confidential. We ask you not to share a password with anyone.

Influence Digital has put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where it is legally required to do so.

Influence Digital provides digital and social media services for businesses / organisations, our own purposes or otherwise, which include, but are not limited to, social media pages, websites, online competitions, promotions or survey's which may contain external links or use of third parties. If you follow a link or otherwise use any of these other websites or third parties, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for

these policies or for these third party services. Please check these policies before you submit any personal data to these websites.

FOR HOW LONG DOES INFLUENCE DIGITAL RETAIN YOUR PERSONAL DATA?

Influence Digital will only retain your personal data for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of Influence Digital's contractual relationship with you or the business / organisation and satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, Influence Digital considers 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 Influence Digital controls and / or processes your personal data and whether Influence Digital can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances Influence Digital may anonymise your personal data so that it can no longer be associated with you, in which case Influence Digital may use such information without further notice to you.

Notwithstanding that you may no longer be a client or employee of Influence Digital, Influence Digital may retain your personal data, but for no more than the time required for the specific purposes for which it is controlled and / or processed by Influence Digital as set out in this Notice or where required by applicable laws and regulations. In such cases, Influence Digital will ensure that such data will continue to be treated in accordance with this Notice.

WEBSITE & COOKIES

Influence Digital uses the following third party service on its website;

Influence Digital uses cookies (small text files stored in your browser), which help Influence Digital monitor the way in which its website is used as well as providing Influence Digital with other information to enable Influence Digital to keep the website relevant to its users and identify specific requests.

You can find out more about what cookies are at: <http://allaboutcookies.org/>.

By browsing Influence Digital's website and communicating electronically with Influence Digital, you acknowledge Influence Digital's controlling and / or processing of data in this way. However, Influence Digital will endeavour to protect your data in accordance with this Privacy Notice. You can choose to refuse cookies or set your browser to let you know each time a website tries to set a cookie. Currently Influence Digital only uses Google Analytics cookies to record anonymous information about the date and time of your visit, the type of browser you are using, your approximate geographic location and the URL of any page that led you to Influence Digital's website. That information is aggregated and used to identify usage trends on our site and to make decisions about which content or presentation styles are most effective. The cookie is stored for 2 years. You can find information about opting out

of your browsing behaviour being shared with Google Analytics by visiting the [Google Analytics Opt-out page](#).

YOUR DUTY TO INFORM INFLUENCE DIGITAL OF ANY CHANGES

It is important that the personal data Influence Digital holds about you or your database of personal information is accurate and current. Please keep Influence Digital informed if your personal data changes so that Influence Digital can update its records. Please inform your usual contact at Influence Digital, or email privacy@influence.digital.

YOUR RIGHTS IN CONNECTION WITH YOUR PERSONAL DATA

Under certain circumstances, by law 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 Influence Digital holds about you and to check that Influence Digital is lawfully processing it.
- **Request correction** of the personal data that Influence Digital holds about you. This enables you to have any incomplete or inaccurate information Influence Digital holds about you corrected.
- **Request erasure** of your personal data. This enables you to ask Influence Digital to delete or remove personal data where there is no good reason for Influence Digital continuing to process it. You also have the right to ask Influence Digital to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **Object to controlling and / or processing** of your personal data where Influence Digital 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 controlling and / or processing on this ground. You also have the right to object where Influence Digital are controlling and / or processing your personal data for direct marketing purposes.
- **Request the restriction of controlling and / or processing** of your personal data. This enables you to ask Influence Digital to suspend the controlling and / or processing of your personal data, for example if you want Influence Digital to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal data to another party.

If you want to review, verify, correct or request erasure of your personal data, object to the controlling and / or processing of your personal data, or request that Influence Digital transfers a copy of your personal data to another party, please email privacy@influence.digital.

Usually, you will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, Influence Digital may charge a reasonable fee if your request for access is clearly

unfounded or excessive. Alternatively, Influence Digital may refuse to comply with the request in such circumstances.

WHAT INFLUENCE DIGITAL MAY NEED FROM YOU

Influence Digital may need to request specific information from you to help confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

YOUR RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, controlling, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact your usual contact at Influence Digital or email privacy@influence.digital, or follow the instructions outlined on the respective client's Privacy Notice. Once Influence Digital has received notification that you have withdrawn your consent, Influence Digital will no longer control and / or process your personal data for the purpose or purposes you originally agreed to, unless Influence Digital has another legal ground for doing so in law.

CHANGES TO THIS PRIVACY NOTICE

Influence Digital reserves the right to update this Privacy Notice at any time. Influence Digital may also notify you in other ways from time to time about the controlling and / or processing of your personal data.

QUESTIONS OR COMPLAINTS

If you have any questions about this Privacy Notice, or you have any concerns or complaints about the way Influence Digital controls and / or processes your data, please email privacy@influence.digital. In any event you have the right to address a complaint to the Information Commissioner, who can be contacted at the following address:

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

www.ico.org.uk

Helpline number 0303 123 1113