

Casbah Group Privacy Notice - External

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PRIVACY NOTICE

Introduction

Welcome to the Casbah Group's privacy notice.

At Casbah Group we respect your privacy and we are committed to protecting your personal data. This privacy notice will inform you about how we look after your personal data (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format. Our aim is to make it as easy to read as possible; the layering allows you to click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

1. IMPORTANT INFORMATION AND WHO WE ARE

2. THE DATA WE COLLECT ABOUT YOU

3. HOW IS YOUR PERSONAL DATA COLLECTED

4. HOW WE USE YOUR PERSONAL DATA

5. DISCLOSURES OF YOUR PERSONAL DATA

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10. GLOSSARY

1. Important information and who we are*

Purpose of this privacy notice

This privacy notice aims to give you information on how Casbah Group collects and processes your personal data whether through your use of this website (including any data you may provide through Casbah Group entity websites) or via other means e.g. an email address we have obtained from you for the purposes of sending you a press release or your involvement in a campaign we are running.

Our websites are not intended for children and we do not, in our ordinary course of business, knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

This privacy notice is issued on behalf of the Casbah Group. *Casbah Group includes without limitation the following entities: Casbah Group Limited; Exposure Promotions Limited, World Exposure Limited, Exposure Earth Limited, Exposure America Inc., Exposure Communications LLC and Exposure Paris SAS (Exposure); Everything Ahead Limited (Everything Ahead); SEEN Group Limited, Beauty Seen Limited and Beauty Seen Inc (SEEN Group); and 360 Degrees Communications Limited (THREESIXTY). References in this notice to the Casbah Group shall also mean any of the above listed entities and businesses and any other entities of the Casbah Group from time to time.

When we mention "the Casbah Group", "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the Group responsible for processing your data. Casbah Group Limited is the controller and responsible for our website.

We have appointed a Data Privacy Team which is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Data Privacy Team using the details set out below.

Contact details

Our full details are:

Full name of legal entity: Casbah Group Limited

Data Privacy Team

Email addresses: dataprivacy@exposure.net

Postal address: 20 Little Portland Street, London W1W 8BS

Telephone Number: 020 7907 7130

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.

Changes to the privacy notice and your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

Our websites may include links to third-party websites. 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 website, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about you

Personal data, or personal information, 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. The most common types of personal data we are likely to process are as follows:

- **Identity Data** includes first name, maiden name, last name, username, title, or similar identifier, social media handles, marital status, title, job title, date of birth, gender and CCTV footage.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from people from whom we have purchased goods or services or who have purchased goods or services from us and other details of such goods or services.
- **Technical Data** includes your browser type and version, and your operating system and platform. We do not collect any Technical Data which enables us to personally identify the users of our website.
- **Profile Data** includes your username and password, your interests, preferences, feedback and survey responses.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may 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.

We do not normally collect any **Special Categories of Personal Data** about people who are not employed by us (or who do not work for us as independent contractors). However, on the occasions that we do collect any Special Categories of Personal Data, we will inform you about that separately. Such Special Categories of Personal Data include 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. Nor do we normally collect any information about criminal convictions and offences about people who are not employed by us (or who do not work for us as independent contractors).

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services or to pay you for services provided by you). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

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

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - request information to be sent to you;
 - ask or agree to our making certain arrangements on your behalf e.g. in connection with travel and accommodation;
 - create an account on a website operated by us or enter a competition, promotion or survey; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data which allows us to track the number of users who visit our website. We do not collect any Technical Data which enables us to personally identify the users of our website.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources including as set out below
 - Technical Data from the following parties:
 - (a) advertising networks;
 - (b) search information providers such as Google; and
 - (c) social media platforms.
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
 - Identity and Contact Data from data brokers or aggregators such as Gorkana, Fashion Monitor, Launchmetrics, Diary Directory, Tribe and Kantar.
 - Identity and Contact Data from publicly available sources (such as Companies House and the Electoral Register based inside the UK).
 - Our clients, suppliers, staff members or other contacts.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Click **here** to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data. If we have relied on consent, you have the right to withdraw consent at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of the principal ways we may 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. Please **contact us** if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Lawful basis for processing including basis of legitimate interest
To register you as a new contact	(a) Performance of a contract with you (b) Necessary for our legitimate interests (e.g. so that we can provide you with information about campaigns we are running which we think is relevant to you)
To process and deliver services or to pay for services we use including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to pay our debts or to recover debts due to us)
To manage our relationship with you which could include: (a) Notifying you about changes to our terms or privacy policy (b) Providing you with information which we think is relevant to you about campaigns we are running (c) Asking you to leave a review or take a survey	(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 enable you to partake in a competition or complete a survey	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how our clients' customers use our products/services, to develop them and grow our and our clients' businesses)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(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 content and information to you and measure or understand the effectiveness of that content and information	Necessary for our legitimate interests (to perform our function as a marketing and communications agency)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences (although we will not as part of this process collect any information which can personally identify you) but not on an automated basis	Necessary for our legitimate interests (to define types of our clients' customers for products and services, to keep our website updated and relevant, to develop our business and that of our clients and to inform strategy)
To make suggestions and recommendations to you about services that may be of interest to you	Necessary for our legitimate interests (to develop our clients' products/services and grow their and our businesses)
To invite you to an event which we or our clients are running which may be of interest to you	Necessary for our legitimate interests (to develop our clients' products/services and grow their and our businesses)

Third parties

We will not share your personal data with any company outside the Casbah Group of companies for marketing purposes without your express opt-in consent.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by emailing us dataprivacy@exposure.net with the word “UNSUBSCRIBE” in the body of your email.

Where you opt out of receiving marketing messages, this will not apply to personal data provided to us as pursuant to a transaction or a contract

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our websites may become inaccessible or not function properly.

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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please **contact us**. (dataprivacy@exposure.net)

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.

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the ***Glossary***
- External Third Parties as set out in the ***Glossary***.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

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.

6. International transfers

We may share your personal data within the Casbah Group. This may involve transferring your data outside the UK.

Some of our External Third Parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

7. Data security

We put in place security measures (which we update regularly) designed 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, 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 procedures in place 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.

8. Data retention

How long will you use my personal 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.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see **Request erasure** below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data as follows:

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please email dataprivacy@exposure.net

No fee usually required

You will not usually 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 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.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to deliver the best quality services and to provide all users of our services with the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or we are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any

potential impact on you in respect of specific activities by [contacting us](mailto:dataprivacy@exposure.net) at dataprivacy@exposure.net

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

Other companies in the Casbah Group acting as joint controllers or processors and who are based either in the EU or in the USA.

External Third Parties

- Service providers acting as processors who provide services which assist our business and the campaigns we deliver for our clients and who may be based inside or outside the UK.
- Our clients - for instance when we are working closely with a client on the delivery of a campaign for that client – and who may be based inside or outside the UK.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers normally based in the EU or the USA who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

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 if 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.