

ARCSPIRE – PRIVACY POLICY

INTRODUCTION

This **privacy policy** is provided by ARCSPIRE LIMITED (Company Number: 10659256) whose registered office is at 32 Blackfriars Road, London, SE1 8PB (referred to as **we, us** or **our**).

We are committed to maintaining the trust and confidence of our clients, our partners, and visitors to our website. We want to ensure you understand how and why we might collect and use your personal data and the rights you have to control what we may do with it.

This privacy policy applies where we are a controller of personal data and aims to give you information on how we collect and process personal data via your use of our services or via your interaction with our business, including such personal data as you provide to us through use of our websites, when you correspond with us or when you might otherwise provide us with your personal data (by any other means).

Where we act as a data processor, we rely upon our clients and partners to ensure that the data passed to us has been lawfully obtained, and that people have been properly informed as to how their personal data will be processed. Accordingly, our clients and partners are responsible for complying with their data protection obligations as a data controller.

1. WHAT PERSONAL DATA WE COLLECT AND STORE

There are various ways we could collect and store personal information about you:

- when you register for an account with us
- when you correspond with us
- through online identifiers when you visit and browse our website
- when you provide them if you meet us, for example, at events or at face to face meetings
- when we connect with you through platforms such as LinkedIn
- when we are provided your data by third parties who have your consent to pass it to us
- through publicly available sources, such as personal data which you have shared via a public platform (such as a Twitter feed or a Facebook page)

This list is not exhaustive, and in specific instances we may need to collect additional data for the purposes set out in this Policy.

2. WHAT TYPES OF PERSONAL DATA WE PROCESS

Personally Identifiable Information

Some of the personal data we collect about you is directly identifiable, for example your name or the email address used to register as a client or when we correspond with you.

Indirectly Identifiable Personal Information

The other type of personal data we collect might not be able to directly identify you, but it could still be possible if it were associated with other pieces of information.

Examples of indirectly identifiable personal information are cookies and IP addresses. A cookie is a small text file which is stored on your browser and is used to help you navigate and interact with a website and its pages. An IP (Internet Protocol) address is an identifier of your computer when it connects to the web. Some of these types of data are necessary to provide our online services, and some we request in order to understand who our visitors are and how to improve our services to them.

Whether it is directly identifiable or not, we treat your personal data in exactly the same way, and will only ever use it for the specific purpose for which it has been provided.

3. WHAT WE PROCESS PERSONAL DATA FOR

For Communication

When you provide your personal data by contacting us, we will only use that data for the specific purpose for which it was provided.

For Direct Marketing

Where you provide your consent, we will use your details to provide you with marketing information about Arcspire that we think will interest you. If we source your corporate email address in the public domain (such as your own company website), then we may contact you proactively with marketing information about our services.

You can withdraw your consent for us to use your personal data for this purpose at any time by sending us or replying to an email, or contacting us through the details included below. We will always honour your request to stop sending you marketing information without undue delay, and if there is no further purpose to retaining your details, we will also erase them. However, where you are an existing client, we may continue to communicate with you for other purposes relating to the services we provide and work that we do with you.

For Our Website to Function

Squarespace: We use Squarespace to run and maintain our website. Their services include processing cookies and IP addresses as a necessary requirement for the smooth running of the site, and which means that your indirectly identifiable personal data may be passed to them. You can access their Privacy Policy here: <https://www.squarespace.com/privacy>

For Analytics

Google: With your consent, we process indirectly identifiable personal information collected during your visits to our website in order to understand how visitors navigate around to help us improve our website. This information is passed to Google to process and report to us in a way which does not identify anyone. You can find out more about how Google uses your data and access their Privacy Policy here: <https://support.google.com/analytics/answer/6004245?hl=en-GB>

To Provide Services to our Clients

Acting as a data processor, we process indirectly identifiable personal information provided by our clients and partners to deliver advertising campaigns for our clients. We do not collect or receive personal data from our clients or partners which directly identifies individuals (such as names, addresses or email addresses).

We process data provided by our clients and publishers of websites you have visited to enhance the accuracy and relevance of the advertising we deliver. We only process personal data to the written instructions of the data controller, and only for the purpose for which it was passed to us.

It is the publisher's responsibility to lawfully derive your consent for the collection and processing of the data that they pass to us. As the data controller, it is also their responsibility to honour your rights to access and control the personal data that they collect. To exercise any of the rights detailed below, please contact the controller through whom the data was passed to us.

4. HOW LONG WE STORE YOUR PERSONAL DATA FOR

We will not store your personal data for any longer than is needed for the purpose you provided it. So, if you have only provided your personal data so that we can respond to a query, we will erase that data once we have done so.

If you opt in to receive marketing communications, or where it is in our legitimate interest to send you marketing communications, we will continue to store your information for as long as you do not withdraw consent or object. If there is then no other purpose for holding your data, it will be erased.

5. HOW TO ACCESS AND CONTROL YOUR PERSONAL DATA

You have the following rights surrounding access and control of your personal data:

- the right to ask for a copy of personal data that we hold about you
- the right to request that we delete personal data held about you
- the right to ask us to update or correct any out-of-date or incorrect personal data that we hold about you
- the right to opt out of any marketing communications that we may send you, and to object to us holding your personal data if we have no legitimate reasons to do so

Where we are provided data that is not directly identifying and that was not originally collected by Arcspire, we may not be able to stop processing or erase your data, even if you request us to. This is because we may be unable to re-identify you through only the data that we hold, and we will not seek to collect other personal data just in order to do so.

If you wish to exercise any of the above rights, please contact us using the details set out below

Disabling Cookies

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies may affect the functionality of the Arcspire website and many others that you visit. If you are not sure whether you need them or not, it is recommended that cookies are not disabled in case they are essential to provide a service that you use.

6. DISCLOSURES OF YOUR PERSONAL DATA

We will not pass your personal data to anyone else without first obtaining your consent, unless there is some circumstance by which we are required to do so by law.

7. MAKING A COMPLAINT

If you feel that your personal data has not been handled correctly by us, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. You can contact them by calling 0303 123 1113 or visit www.ico.org.uk/concerns.

8. UPDATES TO OUR PRIVACY POLICY

We may make changes to this Privacy Policy from time to time, so encourage you to check these pages periodically. This Privacy Policy was last updated on March 12th 2020.

9. HOW TO CONTACT US

We hope this Privacy Notice has been helpful in explaining how we handle your personal data and your rights to control it. If you have any questions that haven't been covered, please contact our Data Protection Officer who will be pleased to help you:

Write to Us

Arcspire Limited
32 Blackfriars Road
London
SE1 8PB

Email Us

team@arcspire.io