

Return on Incentives Privacy Policy

This privacy policy applies to Return on Incentives.

Return on Incentives would like to share with you how it collects certain data about you from when you visit our website: www.returnonincentives.co.uk and also from when you contact us directly and/or from our own marketing activities.

WHO WE ARE

The company is a UK based marketing agency, supporting Public, Private and Charitable organisations with services relating to the marketing of their organisation. Return on Incentives is both a data controller and for its marketing clients a data processor.

APPLICABLE LAWS

The General Data Protection Regulation (GDPR) which is EU wide, together with the Privacy and Electronic Communications Regulations (PECR) last updated 2019, and the Data Protection Act 2018, seek to protect and enhance the rights of UK and EU data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU and its storage within the EEA.

Definitions:

The GDPR:

GDPR relates to The General Data Protection Regulation which took effect from May 25 2018. Personal data is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.

The company:

relates to any legitimate company, by which you are directly employed, authorised to act on behalf of, or plan to create.

Registered Office:

Return on Incentives, 74 Old Gorse Way, Kettering, Northamptonshire, NN14 1GJ

What we may be collecting from you:

- Search terms you have used to either find our website or used on our website, a record of all browsing behaviour including links clicked. This is done via a cookie which is set on your first arrival to our website and the contents of any form you submit to us.
- Information that will help us contact you in the future like: name, company name, address, phone and email.
- All personal information disclosed by you to us, BUT we will not seek to append personal data from external sources.

- Information on engagement with the emails and SMS messages you receive from us.
- The IP address your router freely transmits to our web servers.
- Your browser user agent as freely transmitted by your computer. This includes your browser build information, your device type and your computer's operating system.
- Some personal data may also be collected about you from the forms and surveys you complete, from records of our correspondence and phone calls.
- Return on Incentives will only collect the information needed so that it can provide you with information about its clients' services and its own, the business does not sell or broker your data, although coincidentally there may be times when your information could be contained in data that Return on Incentives has purchased from a third-party list broker on behalf of another client.
- Some of the collected items may contain personal data.
- Social media information either in the public domain or you share with us.

We will not be collecting:

- Information about browsing habits outside of our own domains (namely www.returnonincentives.co.uk)
- Personal sensitive information (special categories of data) relating to you and your private life such as gender and age.

WHERE WE STORE YOUR DATA?

We only store data on our UK Return on Incentives secure servers. Your data will never be stored outside the UK, unless you have specifically requested us to do so.

This data is held in a state-of-the-art highly protected data storage environment within the UK, which is backed up each day to another UK location. Data held will be used to:

- Provide contracted services to clients
- Improve the content and relevance of what we send to you.
- Help improve the content we display on our website.
- Answer any questions you may have submitted and to retain this information to ensure a fast and effective service in the future.
- Provide you with the fastest access to the latest content relevant to you.
- Ensure we remain GDPR compliant.

STORAGE RETENTION POLICIES

Contacts opting out of the Return on Incentives platforms will be pared back to the minimum amount of information needed to ensure their record always remains suppressed, even if the client inadvertently re-purchases and/or supplies a new mailing list containing the same record information.

For legal purposes, client information is maintained for seven years after the relationship has ended and then destroyed. Personally Identifiable data and sensitive data relating to client projects will be erased as agreed in the contract or within 30

days, whichever is sooner. All Personal data is only retained for as long as legally required, for more information please contact hello@returnonincentives.co.uk

LEGAL BASIS FOR PROCESSING PERSONAL DATA

To meet our contractual obligations to clients and legitimate interests to respond to enquiries concerning the automated marketing services provided.

Legitimate interests pursued by Return on Incentives include promoting our services. These communications may include social media, email, newsletters, telephone calls, phone calls, text messages and any other channels to reach those who may be interested in using the different marketing services provided by Return on Incentives. In making contact via our website, you agree to us contacting you to follow-up on your enquiry and to maintaining a dialogue with you.

Return on Incentives will use information collected from you to provide quotations, make telephone contact and to email you information which the business believes may be of interest to you. In you making initial contact, you consent to Return on Incentives maintaining a marketing dialogue with you until you either opt out (which you can do at any stage) or we decide to desist in promoting our services.

Contact information collected from you as a result of requests for product demonstrations will be used by both organisations to promote their legitimate interests.

WHEN ACTING AS A DATA PROCESSOR

Return on Incentives also acts on behalf of its clients in the capacity of data processor. When working as a data processor, Return on Incentives will be acting on the instruction of its client, and will work hard to ensure that the client is also fully GDPR compliant. This may include, for example, supporting the client with a Data Protection Impact Assessment, at the start of the project.

EMAIL OPTIONS

Should you wish to stop receiving marketing emails from Return on Incentives, you can

- Use the unsubscribe link, which will be present within the footer of every email and SMS we send to you. Your subscription preferences will be immediately updated.
- Write to Return on Incentives, specifically requesting your removal (addressed to: Data Controller, Return on Incentives, Suite 1, Brixworth Country Park, Northampton Road, Northampton, NN6 9DG), your request will be actioned within 28 days of its receipt. You must include your name and email address for us to ensure removal.

Please note we cannot accept unsubscribe requests through any other channel.

SHARING INFORMATION WITH RETURN ON INCENTIVES

When providing personal data for Return on Incentives you confirm that you have the necessary permission to use the information and/or any other third parties where applicable.

By posting information on to different social media accounts (belonging to third parties such as employees or supporters) whether entered by you, your contractor or the social media account holder, the Client further confirms that it has the consent to use these accounts and also has the appropriate consent, if applicable, relating to any children under 18.

DATA SECURITY

Due to the open nature of the internet, transmitting any campaign data sent to Return on Incentives must only be done via secure data transfer. It is important to note, any data you send to us is sent at your own risk. Once your data is received, it will be stored within the Return on Incentives secure data environment, where we have robust processes and procedures to keep it safe.

DISCLOSING YOUR INFORMATION

We will only pass on the personal data collected if we have a legal or contractual obligation to do so. However, Return on Incentives may on occasion pass your Personal data to third party data processors exclusively to process work on its behalf. Return on Incentives requires these parties to agree to process this information based on our instructions, confidentiality agreement and requirements consistent with this Privacy Policy and GDPR.

Return on Incentives does not broker or pass on information gained from your engagement with the business without your consent. However, Return on Incentives may disclose your personal data to meet legal obligations, regulations or valid governmental request. The agency may also enforce its Terms and Conditions, including investigating potential violations of its Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of Return on Incentives, its clients and/or the wider community.

YOUR RIGHTS AS A DATA SUBJECT

At any point whilst Return on Incentives is in possession of or processing your personal data, all data subjects have the following rights:

1. Right of access – you have the right to request a copy of the information that we hold about you.
2. Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
3. Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
4. Right to restriction of processing – where certain conditions apply you have a right to restrict the processing.
5. Right of portability – you have the right to have the data we hold about you transferred to another organisation.
6. Right to object – you have the right to object to certain types of processing such as direct marketing.
7. Right to object to automated processing, including profiling – you also have the right not to be subject to the legal effects of automated processing or profiling. In the event that Return on Incentives refuses your request under

rights of access, we will provide you with a reason as to why, which you have the right to legally challenge. Return on Incentives at your request can confirm what information it holds about you and how it is processed.

You can request the following information:

- Identity and the contact details of the person or organisation (Return on Incentives) that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Return on Incentives or a third party such as one of its clients, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (ICO).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

To access what personal data is held, identification will be required

Return on Incentives will accept the following forms of ID when information on your personal data is requested: a copy of your driving licence, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required.

If Return on Incentives is dissatisfied with the quality, further information may be sought before personal data can be released. All requests should be made to dpo@returnonincentives.co.uk or in writing to Return on Incentives, Suite 1, Brixworth Country Park, Northampton Road, Northampton, NN6 9DG.

For more information on GDPR and your rights please see <https://ico.org.uk/for-organisations/data-protection-reform/overview-of-the-gdpr/>

EXTERNAL THIRD-PARTY LINKS

Return on Incentives may, from time to time link to third party websites displaying useful content. It is important to note this privacy policy specifically covers the www.returnonincentives.com domain.

Please ensure you have verified the privacy policies on any hyperlinked external websites before submitting any personal information.

HOW TO CONTACT US

If you have questions concerning the processing of your personal data you should contact the Data Protection Officer: Stephen James, 74 Old Gorse Way, Kettering, Northamptonshire, NN14 1GJ, email: hello@returnonincentives.co.uk

In the event that you have not received a response within 30 days you have the right to contact The ICO, Wycliffe House, Water Lane, Wilmslow, SK9 5AF, Email: <https://ico.org.uk/global/contact-us/email> or telephone: [+44 \(0\) 303 123 1113](tel:+44(0)3031231113).

Return on Incentives ICO registration number:

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