

Cognition AM Ltd Privacy Policy

1. Introduction

- 1.1 We are committed to safeguarding the privacy of our business contacts and website visitors.
- 1.2 This policy applies where we are acting as a data controller with respect to personal data in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 We collect and store personal data in the course of our normal business processes including emails, events, meetings and website engagement as well as correspondence relating to employment, contract and financial transactions.
- 1.4 Your rights in regard to how we hold and process your data are set out below. Our data collection and processing contacts with you will include links to this privacy policy and appropriate opt-in and opt-out mechanisms.
- 1.6 In this policy, "we", "us" and "our" refer to Cognition AM Ltd. For more information about us, see Section 19.

2. How we use your personal data

- 2.1 In this Section 2 we have set out:
 - (a) the general categories of personal data that we may process;
 - (b) the purposes for which we may process personal data; and
 - (c) the legal bases of the processing.
- 2.2 We may process information relating to our clients or event attendees, ("**customer data**"). The customer data may include your name, your employer, your job title or role, your contact details, and information contained in communications between us and you or your employer, including confidential contracts, reports and industry information. You or your employer will have provided this information to us during the normal course of our business with you. The customer data may be processed for the purposes of managing our relationships with customers, communicating with customers and keeping records of those communications. The legal basis for this processing is our contract with you, namely the proper management of our customer relationships and provision of our services.
- 2.3 We may process your data, via the third parties Regonline (Cvent) for marketing of our events and services ("**marketing data**"). This data may include your name, email address, telephone numbers and company details. You will originally have provided this information when enquiring about or registering for events, enquiring about or contracting our services or updating your profile on Regonline (Cvent). This data may be processed for inviting you to attend our events. The legal basis for this processing is our legitimate interests, namely marketing of similar or related products and services. You will always have the ability to simply unsubscribe from our communications.
- 2.4 We may process your data, partially via the third party Sage, in relation to your business transaction with our company ("**financial data**"). The financial data may include your name, email address, telephone numbers, financial accounting specifications and records of our transactions with you including

invoices, statements and receipts. The financial data may be processed for the purposes of managing your business with our company. The legal basis for this processing is our contract with you, namely the proper management of our financial systems.

- 2.5 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 2.6 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 2.7 In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
- 2.8 Please do not supply any other person's personal data to us, unless we prompt you to do so.

3. Providing your personal data to others

- 3.1 We may disclose "customer data" and "Marketing Data" related to our events to our third party event suppliers
- 3.2 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 3.3 Financial transactions relating to services may be handled by our payment services providers HSBC, Worldpay and PayPal. We will share transaction data with our payment services provider only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices on their websites.
- 3.4 In addition to the specific disclosures of personal data set out in Section 2, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

4. International transfers of your personal data

- 4.1 In this Section 5, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).

- 4.2 We may transfer "customer data" to third party Regonline (Cvent) which is GDPR compliant and based in the US for which the European Commission has made an "adequacy decision" with respect to data protection laws, limited to the Privacy Shield framework for which both are registered, insofar as reasonably necessary for the purposes and on the legal bases set out in this policy under Sections 2.2 & 2.5. Information about these parties can be found at <https://www.regonline.com>

5. Retaining and deleting personal data

- 5.1 This Section 5 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 5.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 5.3 We will retain your personal data as follows:
- (a) "customer data" will be retained for a maximum period of six years following our last active contact with you.
 - (b) "marketing data" will be retained until you ask us to unsubscribe or to delete your personal data from this category.
 - (c) "financial data" including your name, email address, telephone numbers, financial accounting specifications will be retained for a maximum of six years after our last active contact with you. Records of our financial transactions with you will be deleted on a rolling six year basis.
- 5.4 Notwithstanding the other provisions of this Section 5, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

6. Security of personal data

- 6.1 We will take appropriate technical and organisational precautions to secure your personal data and to prevent the loss, misuse or alteration of your personal data.
- 6.2 We will store all your personal data on secure servers and cloud hosted services, accessed by personal computers and mobile devices, and in secure manual record-keeping systems.
- 6.3 Electronic personal data stored on-site will be secured in password protected accounts and/or Excel spreadsheets in identified locations on a secure server with restricted access and encrypted on-site and off-site daily backup.
- 6.4 Electronic personal data stored in the cloud will be secured in password protected accounts for third party processors identified in Section 2 with restricted access using security measures detailed in their privacy policies available online.
- 6.5 Manual record-keeping systems are stored on-site in locked cabinets with restricted access

6.6 You acknowledge that the transmission of unencrypted (or inadequately encrypted) data over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

7. Amendments

7.1 We may update this policy from time to time by publishing a new version on our website.

7.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

7.3 We may notify you of significant changes to this policy by email.

8. Your rights

8.1 In this Section 8, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

8.2 Your principal rights under data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

8.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee

8.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

8.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to

erasure. The general exclusions include where processing is necessary: [for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims].

- 8.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
- 8.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- 8.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.
- 8.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- 8.10 To the extent that the legal basis for our processing of your personal data is:
- (a) consent; or
 - (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,

and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

- 8.11 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.
- 8.12 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any

time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

- 8.13 You may exercise any of your rights in relation to your personal data by written notice to us contacting our GDPR compliance officer whose details are given in Section 20.1 below.

9. Third party websites

- 9.1 Our website includes hyperlinks to, and details of, third party websites.
- 9.2 We have no control over, and are not responsible for, the privacy policies and practices of third parties.

10. Updating information

- 10.1 Please let us know if the personal information that we hold about you needs to be corrected or updated.

11. About cookies

- 11.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 11.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 11.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

12. Cookies that we use

- 12.1 We use cookies for the following purposes:
- (a) cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally.
 - (b) optimising performance - we use cookies to help us to manage traffic flow using load balancing.

16. Cookies used by our service providers

- 16.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

16.2 We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at:
<https://www.google.com/policies/privacy/>.

17. Managing cookies

17.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

18. Our details

18.1 Our services are owned and operated by Cognition AM Ltd

18.2 We are registered in England and Wales under registration number and our registered office is at Unit 3, Curo Park, Frogmore, St. Albans, Hertfordshire, AL2 2DD, UK

18.3 Our principal place of business is at the address given in Section 19.2

18.4 You can contact us:

- (a) by post, to the postal address given above;
- (b) using our website contact form <https://www.cognition-am.com>
- (c) by telephone, on +44 (0)1727 876020; or
- (d) by email, admin@cognition-am.com

19. Data protection registration

19.1 We are registered as a data controller with the UK Information Commissioner's Office.

19.2 Our data protection registration number is Z7619865

20. GDPR compliance officer

20.1 We are not required to have a named GDPR Compliance Officer, however if you have any concerns or queries concerning our GDPR compliance please contact us:

admin@cognition-am.com
+44 (0)1727 876020

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