

TURNING THE PAGE

Privacy Policy

Last updated: April 2024

1 Introduction

- 1.1 This website is owned by Page Turn Limited (operating as 'Turning the Page') ('we', 'our' or 'us' being interpreted accordingly). We are a company registered in England & Wales under company registration number 15516337. Our registered office address is at 125 Old Broad Street, London, United Kingdom, EC2N 1AR.
- 1.2 We are committed to protecting your privacy and personal information. Personal information relating to you from which you can be identified that we collect or which you provide is called personal data ('Personal Data').
- 1.3 This privacy policy ('Privacy Policy') tells you about the Personal Data we collect; how we handle or process such Personal Data and who we may share it with. This Privacy Policy also provides information on your legal rights in relation to your Personal Data.
- 1.4 We process your Personal Data as its legal 'controller' in accordance with the UK General Data Protection Regulation, Data Protection Act 2018, Privacy and Electronic Communications Regulations 2003 (as amended) and other applicable laws that regulate protection and privacy of your Personal Data, each as amended from time to time (the 'Data Protection Law').
- 1.5 It is important that you read this Privacy Policy together with any other fair processing notices we may provide on specific occasions when we are collecting Personal Data. This Privacy Policy supplements such other notices and privacy policies and is not intended to override them.

2 Changes to this Privacy Policy

- 2.1 From time to time we may change the way we use your Personal Data and amend this Privacy Policy. Please check that you have seen the latest version.
- 2.2 We aim to ensure that the Personal Data we hold about you is accurate and current. Please keep us informed if your personal details or other information we hold about you changes during your relationship with us.

3 What Personal Data do we collect and use?

- 3.1 The Personal Data about you that we may collect and use includes the following:
 - (a) your name, title, date of birth and gender;
 - (b) your email address, postal address and telephone number;
 - (c) your preferences in receiving marketing from us and other communications;as well as any other Personal Data that you may provide to us from time to time.
- 3.2 We do not collect any special categories of Personal Data about you (this includes 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). We do not collect any information about criminal convictions and offences.

4 How your Personal Data is collected

We collect Personal Data about you through your relationship and communications with us, for example, when you provide your personal details to receive our newsletter or other communications or if you contact us with an enquiry or to provide feedback.

5 What we use your Personal Data for

Other than as stated above, we may use your Personal Data for one or more of the following purposes:

- (a) to manage our business and maintain records of our activities;
- (b) to provide you with direct marketing communications about what we are doing as well as services and/or campaigns which may be of interest to you by post or phone. If required under applicable law, where we contact you by SMS, email, fax, social media and/or any other electronic communication channels for direct marketing purposes, this will be subject to you providing your express consent. You can object or withdraw your consent to receive direct marketing from us at any time, by contacting us using our contact details at section 12 of this Privacy Policy;
- (c) to enforce and/or defend any of our legal claims or rights; and/or
- (d) for any other purpose required by applicable law, regulation, the order of any court or regulatory authority.

6 How we use cookies

- 6.1 A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.
- 6.2 We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our Website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.
- 6.3 Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the Website.

7 The lawful grounds on which we collect and process your Personal Data

- 7.1 We process your Personal Data for the above purposes relying on one or more of the following lawful grounds:
 - (a) where you have freely provided your specific, informed and unambiguous consent for particular purposes such as to receive marketing communications.
 - (b) where we need to use your Personal Data for our legitimate interests in being able to effectively operate our business and this website or the legitimate interests of a third party. We will always seek to pursue these legitimate interests in a way that does not unduly infringe on your other legal rights and freedoms such as your right of privacy; and/or
 - (c) where we need to collect, process or hold your Personal Data to comply with a legal obligation.

8 Disclosing your Personal Data to third parties

- 8.1 We may need to disclose your Personal Data to certain third party organisations who are handling that data only on our behalf and in accordance with our instructions under contract (called '**data processors**') in the following circumstances:
 - (a) companies and/or organisations that act as our service providers (e.g. IT suppliers, data hosting companies);
 - (b) companies and/or organisations that assist us in processing and/or otherwise fulfilling transactions that you have requested (e.g. payment processors or mail service providers).
- 8.2 We may also disclose your Personal Data to third parties who make their own determination as to how they process your Personal Data and for what purpose(s) (called '**data controllers**'), such as our professional legal advisers although we will only do so in accordance with Data Protection Law.

- 8.3 When we share your Personal Data with third party data controllers, we will usually tell you. These data controllers will handle your Personal Data in accordance with their own procedures and you should check the relevant privacy policies of these organisations to understand how they may use your Personal Data.
- 8.4 We may transfer your Personal Data to another company or entity in the event of a corporate reorganisation, merger or sale of our business.
- 8.5 Other than as described above, we will not usually disclose your Personal Data to third party data controllers without you knowing about it. The exceptions are in relation to us being able to establish, exercise or defending our legal rights; in relation to legal proceedings or where we are legally required to do so and cannot tell you.
- 8.6 In all cases we always aim to ensure that your Personal Data is only used by third parties for lawful purposes in line with this Privacy Policy and in compliance applicable Data Protection Law.

9 International Transfers

We do not transfer any of your Personal Data outside the United Kingdom or European Union/ European Economic Area.

10 How long we retain your Personal Data for

- 10.1 We only retain Personal Data identifying you for as long as you have a relationship with us; or as necessary to perform our obligations to you (or to enforce or defend contract claims); or as is required by applicable law.
- 10.2 We have a data retention policy that sets out the different periods we retain data for in respect of relevant purposes in accordance with our duties under Data Protection Law. The criteria we use for determining these retention periods is based on various legislative requirements; the purpose for which we hold data; and guidance issued by relevant regulatory authorities including but not limited to the UK Information Commissioner's Office (ICO).
- 10.3 Personal Data we no longer need is securely disposed of and/or anonymised so you can no longer be identified from it.

11 Security and storage of your Personal Data

- 11.1 We employ appropriate technical and organisational security measures to protect your Personal Data from being accessed by unauthorised persons and against unlawful processing, accidental loss, destruction and damage.
- 11.2 We also endeavour to take all reasonable steps to protect Personal Data from external threats such as malicious software or hacking. However, please be aware that there are always inherent risks in sending information by public networks or using public computers and we cannot 100% guarantee the security of all data sent to us (including Personal Data).

12 Your personal data rights

- 12.1 In accordance with your legal rights under applicable law, you have a '**subject access request**' right under which can request information about the Personal Data that we hold about you, what we use that Personal Data for and who it may be disclosed to as well as certain other information.
- 12.2 Under Data Protection Law you also have the following rights, which are exercisable by making a request to us in writing:
- (a) that we correct Personal Data that we hold about you which is inaccurate or incomplete;
 - (b) that we erase your Personal Data without undue delay if we no longer need to hold or process it;
 - (c) to object to any automated processing (if applicable) that we carry out in relation to your Personal Data, for example if we conduct any automated credit scoring;
 - (d) to object to our use of your Personal Data for direct marketing;
 - (e) to object and/or to restrict the use of your Personal Data for purpose other than those set out above unless we have a legitimate reason for continuing to use it; or
 - (f) that we transfer Personal Data to another party where the Personal Data has been collected with your consent or is being used to perform contact with you and is being carried out by automated means.

- 12.3 All of these requests may be forwarded on to a third party provider who is involved in the processing of your Personal Data on our behalf.
- 12.4 If you would like to exercise any of the rights set out above, please contact us at the address below. Usually, we will have one month to respond to a request from you, although we may, in case of complex requests, require a further two months. We may also ask for information to verify your identity or require further information to clarify the information you seek before we can fulfil your request. We can also refuse to respond (or charge for our administrative time) in relation to any manifestly unreasonable or excessive request.
- 12.5 If you make a request and are not satisfied with our response or believe that we are illegally processing your Personal Data, you also have the right to complain to the Information Commissioner's Office (ICO) – see <https://ico.org.uk/>.

13 Contact

If you have any queries regarding this Privacy Policy or wish to make a request as described above, please contact:

Email: info@turningthepage.com

Postal address: 125 Old Broad Street, London EC2N 1AR