#### **Publication Date 28 March 2025**

#### 1. Introduction

FIPP Limited is committed to safeguarding the privacy of our website visitors, event delegates, members, subscribers and service users.

We use cookies on our website. By using our website, you consent to our use of cookies in so far as they are not strictly necessary for the provision of our website and services.

Please do not supply any other person's data to us unless we prompt you to do so.

## 2. How we use your data

We process several types of personal data, in order to administer our business and services and/or to fulfil our membership or other contract with you. The different categories of data we process, the reasons why we process, and our legal basis are detailed below:

Type of Data	Purpose	Type of Data/Source	Lawful basis for processing
Website and services usage data	To enable us to improve our website and services to better meet your needs.	IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, the timing, frequency and pattern of your service use gathered from our analytics tracking systems.	Our legitimate interests     to improve our products     and services.

Membership, events and services data	To enable us to operate a secure website and provide our membership, events, subscription or other services to you.  Also to maintain backups of databases and to communicate with you.	Name, address, email, job title, employer, telephone number, username, password, IP address, MAC address (the device ID which you use to access our website or services) and account number.  We get this information from you.  Your employer may provide data as well if they are FIPP members, namely your business address, email, telephone, job title and employer's name.	<ol> <li>Our legitimate interests to properly administer our products and services.</li> <li>Performance of a contract with you or your employer.</li> </ol>
Publication data	To enable us to publish information that you give to us or post on our website.	Information that you post on our website or through our services. Your membership data.	<ol> <li>Your consent.</li> <li>Our legitimate interests to provide membership benefits.</li> <li>Performance of a contract with you.</li> </ol>
Enquiry data	To offer, market and sell relevant services to you.	Any data you provide in your enquiry.	1. Your consent.

Transaction data	To allow us to process your purchases and keep proper records.	Your contact details, your card details and the transaction details	<ol> <li>Performance of a contract with you.</li> <li>Our legitimate interests.</li> </ol>
Notification data	To send the emails or newsletters that you've subscribed to.  If you are employed in the magazine media publishing industry, we may contact you via email with details of FIPP's products and services.  If you are employed by a member of FIPP, we may contact you in relation to your membership benefits.	Your contact details.	<ol> <li>Your consent.</li> <li>Our legitimate interests in marketing our services and fulfilling membership benefits.</li> <li>(You can withdraw your consent and unsubscribe by clicking the 'unsubscribe' link in the footer of the emails we send.)</li> </ol>
Correspondence data	To communicate with you and to keep proper records.	The communication content and metadata associated (if communication is via our website contact form).	1. Our legitimate interests in responding to enquiries and messages.

We may also process and disclose any of your data identified in this policy to protect the legal rights of you, us and any other individual. This is because we have legitimate business interests to:

- establish, exercise or defend legal claims, in court or an out-of-court procedure
- obtain or maintain insurance cover, manage risk or obtaining professional advice, in order to properly protect our business against risk
- comply with any legal obligation to which we are subject, or in order to protect the vital interests of you or any other person

### 3. Providing your personal data to others

We may disclose personal data, on a "need to know" basis to:

- Our insurers and professional advisors.
- Our payment services provider to enable them to process your payments. Data is limited to transaction data and is used to process or refund payment and to deal with complaints and queries.
- Our IT service providers from whom we license technology. This enables us to carry out essential business operations.
- Companies who help us to organise and carry out FIPP's events, products and services.
- Companies with whom we may be discussing or agreeing a corporate transaction.

As part of the networking benefits of our organisation, we allow other members of FIPP around the world to search the membership database which contains your company information, your address, your job title, your email, your company's website and head office phone number. If you do not want to be included in the database, you can let us know by either specifying this on your membership form or contacting us via <a href="mailto:privacy@fipp.com">privacy@fipp.com</a>.

## 4. International transfers of your personal data

We have offices in the United Kingdom, which is subject to the EU's high standards of data protection and the hosting facilities for our website are situated within the UK.

Some of our IT service providers are situated in the United States of America. Transfers to the USA will be protected by appropriate safeguards, namely the standard data protection clauses adopted by the United Kingdom and/ or the EU, as required. Please contact us at <a href="mailto:privacy@fipp.com">privacy@fipp.com</a> if you would like a copy of the EU or the UK's standard data protection clauses.

Some of our events may be located outside of the EU. We do not share your delegate data with our event co-hosts who are situated outside of the EU unless we have a business need to do so and suitable safeguards are in place to ensure the safe processing of your data. Such safeguards include

the Standard data protection clauses adopted by the European Commission and the United Kingdom. Co–hosts are not allowed to use your data for marketing purposes unless you specifically agree to this in advance.

FIPP is a global organisation. If you or your employer is a member of FIPP, your name, work email, employer and job title will be available globally to other members to encourage the networking benefits of your membership. If you do not want to be included in the FIPP members' database, you can let us know by either specifying this on your membership form or contacting us at <a href="mailto:privacy@fipp.com">privacy@fipp.com</a>.

You acknowledge that personal data you provide us for publication through our website will be available via the internet around the world. We cannot prevent the use (or misuse) of this personal data by others.

### 5. Retaining and deleting personal data

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our members and customers for six years after they cease being members or customers for tax purposes.

In some circumstances you can ask us to delete your data: see section 8 below for further information.

### 6. Security of personal data

We will take appropriate precautions to keep your personal data safe and prevent the loss, misuse or alteration of that data. For example:

- We will store all your personal data on secure servers, personal computers and mobile devices in secure record-keeping systems. All emails we send are encrypted.
- We do not store any of your credit card information. All financial transaction data including cardholder details are stored by our payment processors.

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.

If you have a password to log into your membership account on our website, you should ensure that it is not easy to guess (by a person or computer programme). You are responsible for keeping the password confidential and we will not ask you for it (except when you log on to the website).

### 7. Amendments

We may update this policy from time to time by publishing a new version on our website. The last publication date will be referenced at the beginning of the Privacy Policy. You should check this page occasionally to ensure you are happy with any changes to this policy. We may notify you of changes to the policy by email.

### 8. Your rights

This is a summary of your rights under data protection law. Some of these rights are very complex. You may obtain guidance from the <u>ICO</u> for a more detailed explanation.

Your rights	What are they?	What will we do?
Access	To know whether or not we process your personal data and have access to that data.	Providing the rights of others are not affected, we will supply you with a copy of your personal data free of charge. Additional copies may be subject to a reasonable fee.
Rectification	You have the right to have any inaccurate personal data about you rectified and have any incomplete personal data about you completed.	When you communicate with us, we will check the data we have stored and rectify any errors when proof is provided.

You have the right to erasure of your personal data when:	We will erase the data as requested on validation of the claims, however data cannot be erased if processing is necessary for exercising the freedom of expression; for compliance; for legal obligation or to establish, exercise or defence against legal claims.		
<ul> <li>Personal data are no longer necessary in relation to the purpose for which it was originally collected.</li> </ul>			
<ul> <li>You withdraw consent to consent-based processing.</li> </ul>			
<ul> <li>You object to the processing under applicable law.</li> </ul>			
<ul> <li>The processing is for direct marketing purposes.</li> </ul>			
• The personal data has been unlawfully processed.			
You have the right to restrict processing of your personal data in the same circumstances as described under "right to erasure" where you oppose erasure or have objected to processing and the decision is pending.	Where processing is restricted, we will continue to store your personal data, but will only process it for legal claims, for the protection of another person's rights or for reasons of public interest.		
1. You have the right to object to processing of your personal data for direct marketing purposes.	1. If you make an objection we will cease to process your data.		
	2. If you object, we will cease to process your personal data unless we can demonstrate compelling reasons for that		
	<ul> <li>Personal data are no longer necessary in relation to the purpose for which it was originally collected.</li> <li>You withdraw consent to consent-based processing.</li> <li>You object to the processing under applicable law.</li> <li>The processing is for direct marketing purposes.</li> <li>The personal data has been unlawfully processed.</li> <li>You have the right to restrict processing of your personal data in the same circumstances as described under "right to erasure" where you oppose erasure or have objected to processing and the decision is pending.</li> <li>1. You have the right to object to processing of your personal data for direct marketing</li> </ul>		

	2. You can also object if the processing of your personal data is for reason of public interest, or for the legitimate interests pursued by us or a third party, or if we exercise any official authority vested in us.	processing, which would include establishing, exercising or defending legal claims.
Data portability	You have the right to receive your data if we have processed it with your consent or as part of performing the contract with you (if carried out by automated means).	We will provide your data to you in a commonly used and machine-readable format. This right does not apply if it adversely affects the right of others.
Complain	You have the legal right to lodge a complaint to a supervisory authority responsible for your data protection.	We will be bound by the decision of the supervisory authority.
Withdraw Consent	You can withdraw consent at any time from processing of publication and notification data.	Contact us via the website to exercise any of your rights in relation to personal data.  Please note that we will always attempt to reply within 14 days but during busy periods, it may take longer.

### 9. Personal data of children

Our website and services are targeted at people over the age of 18. If we have reason to believe we are holding data of anyone under that age in our databases, we will delete that personal data.

## 10. Updating Information

Please let us know by email (privacy@fipp.com) if the personal information that we hold about you needs to be corrected or updated.

### 11. Cookies

A cookie is a file containing an identifier (a string of letter and numbers) sent by a web server to a web browser and stored by the browser. This identifier is then sent back to the server each time the browser requests a page.

Cookies can either be "persistent" when a cookie is stored by the browser until its set expiry date (or when deleted by the user) or 'session' when the cookie expires at the end of the session when the web browser is closed.

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:

We use cookies for the following reasons:

Reason	Purpose	Type of cookie
Advertising	As a way to display advertisements that will be relevant and interesting to you.	See section 13 below.
Analysis	To help analyse the use and performance of our website and services so we can make improvements to content and efficiencies.	See section 13 below.
Social media sharing	To allow us to syndicate content on social media sites.	Twitter button and Twitter syndication, Facebook, WhatsApp, LinkedIn and Google+ buttons.

# 13. Cookies used by our service providers:

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

We use analytics cookies to analyse the use of our website. The information gathered relating to our website is used to create reports about the use of our website. The privacy policies of our analytics providers are available through the following URLs:

Google: google.com/policies/privacy/

New Relic: newrelic.com/termsandconditions/privacy

We also use third party cookies to optimise and measure the effectiveness of our online advertising campaigns. For example, we can track which ads on certain sites lead to potential customers visiting our website. We can target our online ads to those web users who have previously visited our website or our followers on social media. To do this we use cookies from Google AdSense; Google DoubleClick; Google Publisher Tags; Google Safeframe and Google Ads Measurement. Google's privacy policy is linked to above, and Google's specific advertising privacy policy is here: google.com/policies/technologies/ads/

### 14. Managing Cookies:

Most browsers allow you to refuse to accept cookies and to delete cookies but blocking all cookies will have a negative impact upon the usability of many websites (including ours).

The methods to do 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 the following links:

Chrome: <a href="mailto:support.google.com/chrome/answer/95647?hl=en">support.google.com/chrome/answer/95647?hl=en</a>

Firefox: support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences

Opera: opera.com/help/tutorials/security/cookies/

Explorer: support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies

Safari: <a href="mailto:support.apple.com/kb/PH21411">support.apple.com/kb/PH21411</a>

Edge: privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy

#### 15. Our details

This website is owned and operated by FIPP Limited. We are registered in England and Wales under registration number 01006977, and our registered office and principal place of business is at 1st Floor, 48 Chancery Lane, London, WC2A 1JF, UK.

### You can contact us

- by post, to the postal address given above;
- by telephone, on the contact number published on our website from time to time; or
- by email, using info@fipp.com

## 16. Data protection registration

We are registered as a data controller with the UK Information Commissioner's Office as our lead supervisory authority. Our data protection registration number is: Z8747184.

## 17. Third party websites

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