

## **MARKETING PRIVACY NOTICE**

Welcome to Newton's privacy notice which applies to anyone participating in our marketing activities/events, including attending events, filming, testimonials, case studies, quotes and similar activities. We may update it at any time.

We have separate Privacy Notices for the following groups of people:

- employees and contractors;
- candidates applying for roles at Newton;
- users of our website; and
- those whose data we may process on behalf of one or more of our clients.

We need to collect and use certain information about you so that we can manage our relationship with you. Some information we collect, and use will be personal data.

Newton Europe Limited is a "data controller" and is responsible for your personal data (referred to as "Newton", "we", "us" or "our" in this privacy notice). This means that we decide how we hold and use the personal data we collect about you.

Newton respects your privacy. We think that it is important to be transparent about how we collect and use your personal data and are committed to protecting the privacy and security of the information we hold about you. This privacy notice provides more information about how we do this and provides you with certain information that must be provided under the retained EU law version of the UK General Data Protection Regulation (**UK GDPR**).

### **1 CONTACT**

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below:

Full name of legal entity: Newton Consulting Limited

Email address: sarah.dasilva@newtonimpact.com

Postal address: 2 Kingston Business Park, Kingston Bagpuize, Abingdon, Oxfordshire, OX13 5FE

Telephone: 01865 601300

### **2 DATA PROTECTION PRINCIPLES**

We will comply with data protection law and principles, which means that your data will be:

- used lawfully, fairly and in a transparent way;
- collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- relevant to the purposes we have told you about and limited only to those purposes;
- accurate and kept up to date;

- kept only as long as necessary for the purposes we have told you about; and
- kept securely.

### 3 WHAT PERSONAL DATA DO WE COLLECT?

We may collect, store and use a range of personal data about you. This may include any of the following:

- personal and work contact details, such as name, title, addresses, telephone numbers and email addresses;
- gender;
- photographs or videos; and
- current employment details (including job titles and work history).

We may also collect, store and use the following types of more sensitive personal data:

- information about your race or ethnicity.

### 4 HOW IS YOUR PERSONAL DATA COLLECTED?

We may collect personal data about you in a variety of ways. For example, from:

- you directly. For example, when you participate in one of our events or contribute content to a case study;
- forms or other correspondence provided by you (including emails or forms we may ask you to complete).

We may also collect personal data about you from third parties, such as publicly accessible data from third parties, including LinkedIn and Facebook.

### 5 WHY DO WE NEED TO PROCESS YOUR PERSONAL DATA?

We may need to collect, store and use personal data about you to **pursue legitimate interests of our own, or those of third parties**. When we do this, we always make sure that your fundamental interests and rights do not override those interests. We may also collect, store and use personal data about you because **you have given your consent for us to do so**.

The examples given below do not form an exhaustive list of purposes for which your personal data will be processed, and we reserve the right to add to them at any time.

### 6 SITUATIONS IN WHICH WE USE YOUR PERSONAL DATA

The situations in which we will process your personal data are listed below:

**To pursue legitimate interests of our own, or those of third parties, including:**

- to run our marketing events and communicate with you about such events;

- to promote Newton to existing and potential clients by providing information about the work that we do, including information about current and previous projects; and
- to promote Newton to potential candidates by providing information about what it is like to work with Newton.

## **7 WHO HAS ACCESS TO YOUR PERSONAL DATA?**

Your information will be shared internally, including with your Newton point of contact, marketing, recruitment, finance and IT staff, in each case if and where access to the data is necessary for performance of their roles.

We may also share your personal data externally with third parties where required by law or where we have another legitimate interest in doing so. For example, we may share your personal data with third parties in order to:

- run and administer our marketing events. These events may be conducted in person or virtually (for example Microsoft Teams)
- produce and edit promotional videos;
- produce promotional materials, including flyers, case studies and social media posts; and
- obtain professional advice on our marketing and/or PR strategy.

Where we share your personal data with third parties, we require that they respect the security of your data and treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Your data may be transferred to countries outside the UK. Where personal data is transferred outside the UK, we require that appropriate safeguards are in place.

## **8 INTERNATIONAL TRANSFERS**

Many of our external third parties are based outside the United Kingdom (UK) so their processing of your personal data will involve a transfer of data to countries outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by virtue of an adequacy regulation under section 17A or adequacy decision under section 18(2) each of the DPA 2018;
- where we use certain service providers, we may use standard clauses approved by the Secretary of State under section 119A of the DPA 2018 which give personal data the same protection it has in the UK; and

- where we use a service provider who is a member of a larger corporate group and this will involve the service provider transferring personal data outside the UK (but within their group of companies) the service provider may have binding corporate rules in place (checked and verified by us).

Please contact Sarah da Silva (sarah.dasilva@newtonimpact.com) for further information on the specific mechanism used by us when transferring your personal data out of the UK.

## 9 HOW DO WE PROTECT YOUR PERSONAL DATA?

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

We have also put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

## 10 FOR HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. After this period, we will securely destroy your personal data in accordance with applicable laws.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

## 11 WHAT ARE YOUR RIGHTS?

Under certain circumstances, by law you have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it;
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected;
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have

the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below);

- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes;
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it; and
- **Request the transfer** of your personal data to another party.

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact us at [info@newtonimpact.com](mailto:info@newtonimpact.com).

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

If you believe that we have not complied with your data protection rights, you can complain to the Information Commissioner (ICO), the UK supervisory authority for data protection issues (<https://ico.org.uk/>). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

## 12 AUTOMATED DECISION-MAKING

Automated decision-making takes place when an electronic system uses personal data to make a decision without human intervention.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

## 13 CHANGES TO THIS PRIVACY NOTICE

We keep our privacy policy under regular review and may update this privacy notice at any time. We may also notify you from time to time about the processing of your personal data.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.