

# **LOCALiQ PRIVACY AND COOKIE POLICY**

## **Introduction**

Welcome to LOCALiQ's client website privacy policy.

We provide marketing services for our clients all over the UK. LOCALiQ respects your privacy and is committed to protecting your personal data. This privacy and cookie policy tells you how we look after your personal data when you visit our client's websites (regardless of where you visit from) and about your privacy rights and how the law protects you.

This privacy and cookie policy is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

- 1. IMPORTANT INFORMATION AND WHO WE ARE**
- 2. THE DATA WE COLLECT ABOUT YOU**
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## **1. Important information and who we are**

### **Purpose of this privacy policy**

This privacy policy aims to give you information on how LOCALiQ collects and processes your personal data on behalf of our clients when you use their websites, for instance by making an inquiry, buying a product or

service, subscribing to news feeds about products or services, or entering a promotion or competition. Specific information about how we use cookies to process data is given in the Cookie Policy at #11.

The website you are using is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

### **Controller and processor**

Our client whose website you use is the controller and responsible for your personal data, and we are the processor on their behalf. LOCALiQ is a trading name for Newsquest Media Group Limited. Details of the controller will appear on the website you are using.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO by email to [privacy@newsquest.co.uk](mailto:privacy@newsquest.co.uk) or by post to Newsquest Media Group Data Protection Office, c/o NMG Legal, Loudwater Mill, Station Road, High Wycombe, Buckinghamshire HP10 9TY.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.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.

### **Changes to the privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review.

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.

### **Third-party links**

The website you visit may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy policies. When you leave our client's website, we encourage you to read the privacy policy of every website you visit.

## **2. The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.

- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from our clients.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our client's website
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey response.
- **Usage Data** includes information about how you use a website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from our clients and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

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). Nor do we collect any information about criminal convictions and offences.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract our client has or is trying to establish with you, and you fail to provide that data when requested, then it may not be possible to perform or establish the contract (for example, to provide you with products or services). In this case, we may have to cancel a product or service you have ordered, but we will notify you if this is the case at the time.

### **3. How is your personal data collected?**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give your Identity, Contact and Financial Data by filling in forms or by corresponding with our client by post, 'phone, email or otherwise. This includes personal data you provide when you:
  - make an inquiry or apply for our client's products or services;
  - create an account on our client's website;
  - subscribe to our client's service or publications;
  - request marketing information to be sent to you;
  - enter a competition, promotion or survey; or
  - give feedback or otherwise make contact.

- **Automated technologies or interactions.** As you interact with our client's website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our Cookie policy [here](#) for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties or public sources as set out below:
- **Technical Data** from the following parties:
  - (a) analytics providers such as Google (based outside the UK)
  - (b) search information providers such as Google and Microsoft (based outside the UK)
  - (c) Social network provider such as Facebook, Instagram, SnapChat, TikTok and LinkedIn (based outside the UK)
- **Identity and Contact Data** from publicly available sources such as Companies House and the Electoral Register based inside the UK.

#### 4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Our **Glossary** covers the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

#### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we may use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you with our client as a new customer	(a) Identity	Performance of a contract with you

	(b) Contact	
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for legitimate interests (to recover any debts due)
To manage our client's relationship with you which will include: (a) Notifying you about changes to the terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for legitimate interests (to keep our records updated and to study how customers use our clients' products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for legitimate interests (to study how customers use our clients' products/services, to develop them and grow the business)
To administer and protect our client's businesses and the relevant website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for legitimate interests (for running the business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising served to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for legitimate interests (to study how customers use our clients' products/services, to develop them, to grow the business and to inform marketing strategy)
To use data analytics to improve the website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for legitimate interests (to define types of customers for our client's products and services, to keep the website updated and relevant, to develop

		the business and to inform marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for legitimate interests (to develop our client's products/services and grow the business)

**Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from our clients if you have requested information from them or purchased their products or services and you have not opted out of receiving that marketing.

**Third-party marketing**

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

**Opting out**

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you by or contacting us at [dms@localiq.co.uk](mailto:dms@localiq.co.uk).

Where you opt out of receiving these marketing messages, this will not apply to personal data provided as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

**Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see the Cookie Policy [here](#).

**Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. Disclosures of your personal data**

We may share your personal data with the parties set out below for the purposes set out in the table “*Purposes for which we will use your personal data*” above.

- Internal Third Parties as set out in the *Glossary*.
- External Third Parties as set out in the *Glossary*.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to 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 and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. International transfers**

Some of our external third parties are based outside the UK so their processing of your personal data will involve a transfer of data 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 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.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

## **7. Data security**

We have 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 personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8. Data retention**

How long will you use my personal data for?

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.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting [dms@localiq.co.uk](mailto:dms@localiq.co.uk)

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## **9. Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please contact us.

### **No fee usually required**

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 is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.



## 10. Glossary

### LAWFUL BASIS

**Legitimate Interest** means the interests of our client's business in conducting and managing its business so as to give you the best service or product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for these legitimate interests. We do not use your personal data for activities where these interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

### THIRD PARTIES

#### Internal Third Parties

Other companies in the Newsquest Media Group acting as joint processors and who are based in the UK and provide IT and system administration services.

#### External Third Parties

- Service providers acting as processors based in the UK, the Netherlands, the USA and other countries who provide IT and system administration services.
- Professional advisers acting (as processors or joint controllers) including lawyers, bankers, auditors and insurers based in the UK, who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities (acting as processors or joint controllers) based in the UK who may require reporting of processing activities in certain circumstances.

### YOUR LEGAL RIGHTS

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 data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**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 successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal

data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

## 11. LOCALIQ COOKIE POLICY

We provide digital marketing services to our clients, who operate the website you are visiting. Our client's website uses cookies to distinguish you from other users. This helps our client and us to provide you with a good experience when you browse the website and also allows us to improve the site.

A cookie is a small file of letters and numbers that is stored on your browser or the hard drive of your computer, if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

**Analytical or performance cookies.** These allow us to recognise and count the number of visitors and to see how visitors move around the website when they are using it. This helps us to analyse user journeys on the website, for example, by tracking what users do as they move through the website.

**Functionality cookies.** These are used to recognise you when you visit the website, and to deploy specific pieces of functionality that enable us to track when you make a proactive contact to our client, such as making a phone call, submitting an online form, or sending an email. This functionality and our storing of information about you as an individual can be partially controlled by clicking either “Accept” or “Decline” on the banner that contained the link that led you to this page.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

<b>Functionality</b>	<b>What is it?</b>	<b>"Accept"</b>	<b>"Decline"</b>
<b>Tracked call numbers</b>	We use dynamic phone number insertion on this website to show a number (not your own) which depends on the original source of entry to the website. We do this so we can identify call volumes that have come from a particular source.	Enabled	Enabled, but in an anonymised session that doesn't track your IP address or any other personal data.
<b>Phone recording</b>	If you make a phone call, you may be asked whether you are happy for that call to be recorded. We do this to provide records of phone calls to our clients, where you allow the recording to be made.	Enabled, user is able to consent to recording on a call-by-call basis	Enabled, user is able to consent to recording on a call-by-call basis
<b>Chat agent engagement</b>	Some of our clients have virtual chat agents to assist and help answer any questions you may have.	Enabled, user is required to positively consent to Chat agent consent statement	Enabled, user is required to positively consent to Chat agent consent statement. Session is anonymised and IP address or any other personal data is not collected.
<b>Form fill tracking</b>	We track submissions made through online forms on this website. We do this to measure and report on form submissions and collect data on the nature of those enquiries.	Enabled	Enabled, but in an anonymised session that doesn't track IP address
<b>Session/traffic info</b>	These allow us to recognise and count the number of visitors and to see how visitors move around the website.	Enabled	Enabled, but in an anonymised session that doesn't track IP address

- We do not share the information collected by the cookies with any third parties.