

Privacy Policy

Recognite Limited is a company registered in England and Wales under company number 11777632 and has its registered office at Alumuna, Wreatham Rd, Great Hockham, IP24 1NY. Privacy@recognite.co.uk

Last updated: 1 September 2020

Brexit and the UK

Recognite Ltd is a group company, with operations inside and outside the EEA. When we receive data from organisations outside the UK, we rely on Standard Contractual Clauses, or other permitted measures to allow the data to flow freely in accordance with the GDPR.

Where Recognite Ltd transfers data to recipients inside the EEA, no further measure is necessary currently, although we will keep this under review.

Introduction

Recognite Limited ("**Recognite**") is a technology company headquartered in the UK that provides advertising and marketing solutions ("**Services**") to a variety of clients who have online operations ("**Clients**").

We contract directly with most of our Clients to provide our Services. We also make available our Services to certain affiliate partner networks who are able to on-provide our Services to their respective clients - in this Privacy Policy, the term "Clients" also includes these clients of our affiliate partners.

We take privacy seriously and are committed to ensuring a safe online experience. This privacy policy ("**Privacy Policy**") explains how we use and protect personal information that we receive or collect, as set out further in this Privacy Policy.

We collect personal information about:

- **End users who visit Client websites:** when you visit or interact with our Clients' websites, mobile applications and services (including those of our affiliate networks) ("**Client Sites**"), we collect and process personal information about you. **We use this information to understand more about you and to advertise or promote our Clients' products and services to you.** Please see [Opting-out](#) below if you wish to opt-out. You may have been redirected here because you have visited a Client Site; and
- **Clients and other visitors to our own website:** we collect and process personal information about Client personnel who use our Services and others who visit www.recognite.co.uk ("**Our Site**").
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This Privacy Policy is set out in three parts:

- **Part I – Information for end users who visit Client Sites:** this section is relevant to you if you visit any of our Client Sites – this is likely to be the case where you have been redirected here from another website. Our policy describes what personal information we collect and how we use it in relation to your interaction with Client Sites.
- **Part II – Information for Clients and other visitors to our Site:** this section is relevant to Clients who use our Services and other persons who interact with Our Site. It describes what personal information we collect about you and how we use it.
- **Part III – Miscellaneous:** this section contains further information about our use of personal information, including the rights you have.

How do I opt-out?

If you have visited one or more Client Sites and wish to opt-out of Recognite processing your personal information, including where you wish to opt-out of Recognite displaying personalised ads to you when you visit third party websites and platforms, please see [How to opt-out of our use of your personal information](#).

How to contact us

If you have any questions or wish to [exercise your rights](#) set out in this Privacy Policy, please contact our Data Protection Officer at: Recognite Data Protection Officer, Alumuna, Wreatham Rd, Great Hockham, IP24 1NY. | Email: privacy@recognite.co.uk.

Part I - Information for end users who visit Client Sites

What personal information do we collect and how do we collect it?

We collect the following categories of personal information from you:

- email addresses and/or telephone numbers, if voluntarily entered into a Client Site by you (e.g. to buy a product or service, become a registered user, or sign up for marketing communications) ("**Contact Details**");
 - IP (internet protocol) address; referring site URL (website address) where your session started, and details about your device, including type (e.g. mobile or tablet), brand, model, operating system name and version, browser name, version, language and protocol, and other unique numbers assigned to a device (e.g. IDFA on iPhone, Google adID on Android);
 - details about the pages of Client Sites visited and activities on Client Sites (e.g. products viewed and the time and duration of visits to

pages of the Client's Site), page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page;

- using your IP address, your geolocation (e.g. postcode); and
- mailing address, age and/or date of birth, gender, marital status, number of children, nationality and/or country or city of residency, telephone number and first name, in each case if input into a Client Site by you ("**Profile Data**").

For more information about the technology that we use to collect Behavioural Data, please see our [Cookie Policy](#).

We share personal information about you (including Behavioural Data and Profile Data) within the Recognite group of companies to enable us to provide and improve our Services. A list of our group companies is available [here](#).

We do not collect sensitive information from you (such as data relating to health or religious beliefs). Recognite does NOT share any data collected with third party companies or sites.

How do we use the information we collect?

The primary purpose for which we collect personal information from you is a) to help our Clients to market, and facilitate the sale of, their products and services more effectively and/or efficiently and b) to provide a more personalised online experience for you. We achieve this by using information that we have collected to create inferences about your personal preferences, interests and behaviour.

Recognite combines information that it collects from you across all Client Sites and uses that personal information for the benefit of each of its Clients. By way of example:

- if Recognite collects personal information when you visit Client Site A, that personal information may be used to display an ad to you for products available on Client Site B.
- if Recognite collects personal information when you visit Client Site A, and you subsequently visit Client Site B and provide Client B with permission to send you marketing, Recognite may use the information collected on Client Site A to personalise the content of Client B's marketing communications that are then sent to you.

To serve you our personalised advertisements on Clients websites and provide you with a seamless online experience, we may link your identifiers on the different browsers and environments you are using ("ID Syncing"). Thanks to its ID-syncing technology, Recognite is able to serve you the most relevant ads on whichever device or browser you are currently using.

Help our Clients analyse the effectiveness of their ad campaigns and to improve the Services we provide to Clients.

We use the information we collect to operate, manage, maintain and improve our Services and to help our Clients analyse the effectiveness of their ad campaigns.

Clients are able to access reports through Ve's reporting platform that help them to analyse the effectiveness of their ad campaigns.

Who do we share your personal information with for this purpose?

Recognite provides Clients with personal information, and analysis of that personal information where the activity is attributed to advertisements served by Recognite, or emails viewed and clicked on, as well as details of resulting conversions or browsing activity on that website. This may include the sharing of personal data of the user's activity on that specific client's site.

We also provide Clients with aggregated information about you and others across different websites (for example, we may inform Clients that 500 men aged under 30 have purchased a particular brand in the last 6 months).

What is our legal basis?

Recognite has historically relied upon Legitimate Interest for processing of data for personalised advertising via cookies. However, having continually evaluated this basis through the mandatory Legitimate Interest Assessment, Recognite has decided to transition to Consent as the lawful basis of processing. Your Consent will be requested for any new cookies that may be deposited on your browser on subsequent visits to the websites of advertising clients with whom we are a Joint Controller.

Email and SMS marketing and other communications sent by Clients using Recognite Services.

Where you provide your [Contact Details](#) on Client Sites and, in doing so, provide Clients with permission to send marketing communications to you, Recognite may use the personal information about you that it has collected (from any Client Site) to create personalised marketing communications which are then sent by Recognite on behalf of Clients who hold a valid permission to market to you. These marketing communications may be sent by email, text message and in-app push notifications, or similar methods, and will always be sent from Recognite on behalf of Clients.

Who do we share your personal information with for this purpose?

We do not share your personal information with third parties outside of the Recognite group for this purpose.

Marketing communications may be sent by Recognite on behalf of Clients to you by email or text message where you have consented to receive such communications from the relevant Client or where our Client has a lawful right to send the communication.

Providing you with a customised experience when you visit Client Sites.

Recognite uses the personal information that it collects on behalf of clients, as a Processor to provide you with a personalised and unique browsing experience when you visit a Client Site. For example, Clients may, using our Services, wish to display personalised offers, messages, content and/or product recommendations on Client Sites, based on the personal information collected about you on that website.

Providing Clients with market insight and analysis. Business administration and legal compliance.

We use your personal information for the following business administration and legal compliance purposes:

- to comply with our legal obligations;
- to enforce our legal rights;
- protect rights of third parties; and
- in connection with a business transaction such as a merger, acquisition by another company, or sale of all or a portion of our assets.

Who do we share your personal information with for these purposes?

We may share your personal information with professional advisers and/or governmental or regulatory authorities or any of our group members.

What is our legal basis?

Where we use your personal information in connection with a business transaction, enforce our legal rights or to protect the rights of third parties, it is in our legitimate interest to do so and we will use either legitimate Interest, or legal obligation depending on the exact circumstances.

For all other purposes described in this section, it is our right to use your personal information to comply with any legal obligations to which we are subject.

If we wish to use your personal information for any new purpose that is not listed above, we will, prior to using such personal information, evaluate whether it is in our legitimate interest to use the personal information for that purpose. If we determine that it is in Recognite's legitimate interest to do so, we will update this Privacy Policy to explain the new purpose. Please check back frequently to see any updates or changes to this Privacy Policy.

Part II – Information for Clients and other visitors to our own Site

What personal information do we collect from Clients (and other people who visit Our Site) and how do we collect it?

We may collect the following categories of personal information from you:

- name, address, e-mail address, telephone numbers, and any other personal information voluntarily submitted by you when you subscribe, register, complete forms or purchase products on Our Site, or correspond with us (via Our Site or otherwise) ("**Voluntary Data**"); and
- data relating to your browsing activity through the use of cookies, web beacons and pixel tags and similar technologies ("**Tags**") deployed on Our Site or emails sent by us to you, ("**Behavioural Data**"), including:
 - - IP (internet protocol) address; referring site URL (website address) where your session started, and details about your device, including type (e.g. mobile or tablet), brand, model, operating system name and version, browser name, version, language and protocol, and other unique numbers assigned to a device (e.g. IDFA on iPhone, Google adID on Android);
 - details about the pages of Our Site visited and activities on Our Site (e.g. the time and duration of visits to pages of Our Site), page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page;
 - using your IP address, your geolocation (e.g. postcode);

How do we use the information we collect from Clients (and other people who visit Our Site)?

The primary purpose for which we collect the personal information from you is to: (i) verify your identity; (ii) help us improve our Services and develop and market new products and services; (iii) carry out requests made by you on Our Sites; (iv) investigate or deal with enquiries or disputes; (v) comply with applicable laws or the requirements of a court or regulator; (vi) enforce our agreements with

Clients and vendors; (vii) protect the rights, property or safety of us or third parties, including our Clients and those who visit Our Site; (viii) provide support for the provision of our Services; and (ix) use as otherwise permitted by law.

Part III – Miscellaneous

Our use of cookies and similar technologies

Recognite makes use of certain cookies, pixels, beacons, log files and other technologies used on Client Sites and Our Site.

Our Cookie Policy explains how you can manage and delete cookies which relate to Our Site.

How to opt-out of our use of your personal information

This section explains how you can opt-out of our use of your personal information collected in relation to your interactions with Client Sites, including how you can opt-out of us displaying personalised ads to you when you visit third party websites and platforms.

We explain below various mechanisms which you can use to opt-out of our use of your personal information in respect of Services that we provide in relation to Client Sites.

Note that some of these mechanisms are subject to various limitations and conditions. In particular some of the mechanisms require that we place a cookie on your browser in order to identify you as a person who has opted-out of our use of your personal information. If you clear cookies or reset your device settings, we will not be able to identify you as a person who has opted-out of our use of your personal information.

Retention of opt-out lists: Where you exercise your right to opt-out of receiving adverts or any personalised form of marketing, we will need to retain enough information (such as a cookie id, advertising id, or email address) in a suppression list to ensure that you do not received further marketing from us or sent by us on behalf of our Clients. This retention period will not expire, unless you contact us to advise that you would like us to, once again, send you marketing communications.

Where you opt-out using the below mechanisms, we will restrict our use of your personal information according to the opt-out that you have chosen, but we may retain your personal data as described in this Privacy Policy (for further information please see [How long do we keep your personal information for?](#)):

Deleting cookies on your device or browser.

We rely on cookies and other online identifiers to collect and use your personal information. You can delete cookies from your devices and browsers to prevent us from collecting data about you and identifying you.

If you opt-out of our use of your personal information using this method, we would still use personal data that we hold and collect about you from other devices and/or browsers, unless you also delete the cookies from all of the other devices and/or browsers that you use. Accordingly, you may wish to opt-out of the relevant use by using the other toggle buttons above.

Native apps – Apple/iOS and Android.

If you have an Apple device, you can opt out of targeted advertising services by updating to iOS 6.0 or higher and setting Limit Ad Tracking to 'ON'. You can do this by clicking on Settings -> Privacy -> Advertising -> Toggle Limit Ad Tracking to 'ON'. Our systems are designed to respect your choice and not use information to provide targeted advertising when this setting is ON. Again, you should consult Apple's support web pages and instructions for the most current applicable settings.

If you have an Android device, you can opt out of targeted advertising services by clicking on Settings -> Google -> Ads -> Toggle Opt Out of Ads Personalization to 'ON'.

How to access your information and your other rights

In addition to your right to opt-out of our use of your personal information in respect of Services which we provide in relation to Client Sites (please see [How to opt-out of our use of your personal information](#)), you have the following rights in relation to the personal information we hold about you:

Your right of access.

If you ask us, we'll confirm whether we're processing your personal information and, if so, provide you with a copy of that personal information (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.

How long do we keep your personal information for?

In relation to personal information that we obtain in relation to your use of Client Sites, as described in Part I of this Privacy Policy.

We retain your Contact Details, Behavioural Data relating to you and Profile Data (for further information see Part I of this Privacy Policy - [What personal information do we collect and how do we collect it?](#)) for a period of **thirteen months** from the date we collect your data via our cookies.

Confidentiality and security of your personal information

We are committed to keeping secure the personal information that you provide to us and we will take reasonable precautions to protect your personal information from loss, misuse or alteration.

We have implemented information security policies, rules and technical measures to protect the personal information that we have under our control from:

- unauthorised access;
- improper use or disclosure;
- unauthorised modification; and
- unlawful destruction or accidental loss.

All of our employees and data processors (i.e. those who process your personal information on our behalf, for the purposes listed above), who have access to, and are associated with the processing of personal information, are obliged to respect the confidentiality of the personal information of all persons who use our Services.

Changes to this Privacy Policy

We may make changes to this Privacy Policy from time to time.

To ensure that you are always aware of how we use your personal information we will update this Privacy Policy from time to time to reflect any changes to our use of your personal information. We may also make changes as required to comply with changes in applicable law or regulatory requirements. We will notify you by e-mail of any significant changes. However, we encourage you to review this Privacy Policy periodically to be informed of how we use your personal information.