



Privacy Policy

1. Introduction

This Privacy Policy explains how we use any personal data (also referred to as 'information' or 'data') we collect about you. We are the data controller in respect of any data we collect about you.

This Policy describes:

- what information we collect
- how we use information
- who we share information with
- your rights regarding our use of your information
- how long we keep information
- how to contact us.

2. What information do we collect about you?

We collect information about you:

- when you register with us
- if you are a client
- if you make an enquiry about our services
- if you apply to us for a job or are employed by us
- if we have or are about to enter a commercial arrangement or relationship with you
- when you voluntarily agree to be on our contact lists in relation to our client communications
- when you complete customer surveys, provide feedback and participate in competitions for our clients
- when we use cookies to collect information about your use of our website. For more information about how we use cookies please see Appendix A below.
- when we use a third-party service (e.g. Google Analytics) to collect information about how visitors to our website use the site, including collecting information about what country you logged on from, which pages you visited and how long you were on our site.
- When you access any of our social media platforms.

3. How do we use your information?

We use your information to:

- process your request for information about our company and, if you agree, to email you about other services we think may be of interest to you
- if you make an employment enquiry
- if you make an enquiry about our services
- email you about similar goods and services to those you've purchased from us which you may be interested in
- enter and perform a contract with you or to perform any steps you require from us before entering into a contract. If you do not provide information required by us to enter into a contract with you, we will not be able to enter into that agreement with you or provide you the services you require.

We will rely on one of the following legal grounds (as appropriate) to process your personal data:

- to enter and perform a contract with you or to perform any steps you require from us before entering into a contract
- to pursue our legitimate business interests in providing and marketing our products and services
- your specific consent to us using your information, which you can withdraw at any time
- to comply with our legal obligations and establish, exercise or defend our legal rights
- those other purposes that you have agreed with us.

4. Who do we share information with?

We sometimes need to share the personal information we process with other organisations and, where necessary or required, we may share your personal data with the following categories of third parties:

- data processors, who are our suppliers who provide us services
- service providers and suppliers assisting with our business activities, business associates, customers, payment services providers, hosting providers, providers of IT support, providers of cloud-based software or services used by us, accounting firms and law firms
- if you become an employee or freelancer current, past and prospective employers, recruitment and employment agencies, trade and employer associations and professional bodies and educators and examining bodies information in relation to payroll and ancillary matters.
- persons connected with any sale, merger, acquisition, disposal, reorganisation or similar change of our business (including any potential or actual purchaser of that business and that purchaser's advisors)
- ombudsman, regulators, public authorities and security organisations such as the police, HM Revenue & Customs and the Information Commissioner's Office to the extent required by law, regulation, court order or if necessary to establish, exercise or defend our legal rights, including if we suspect fraud or attempted fraud local and foreign regulators, governments, law enforcement authorities, advisors, courts, tribunals and arbitrators
- financial organisations and advisors, credit reference agencies, debt collection and tracing agencies
- staff including, agents and consultants
- other third parties, with your consent.

At this time none of these third parties are based outside the European Economic Area (**EEA**) in, for example, the following countries: the United States of America, China, Hong Kong, Singapore, the United Arab Emirates, Qatar, Kenya and Russia.

If in the future we do need to transfer your information from the EEA to a jurisdiction outside the EEA, we will take appropriate steps to protect that information which includes: (i) entering into an agreement with the third party which includes clauses that the EU Commission has determined offers adequate protection for your information, a template copy of which is available at https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en or (ii) otherwise ensuring that information would only be transferred to third parties in jurisdictions that the EU Commission has determined offers adequate protection for your personal information.

5. What are your rights in relation to our use of your information?

You have rights under data protection law in relation to our use of your personal data, including to:

- request access to your information by submitting a request to [**reception@rochecom.com**](mailto:reception@rochecom.com)
- update or amend your information if inaccurate or incomplete
- object to certain uses of your personal data including direct marketing and processing based on legitimate interests and processing for purposes of scientific or historical research and statistics on grounds relating to your particular situation
- request the deletion of your information, or restrict its use, in certain circumstances (for example, subject to lawful exceptions applying, you can request that we erase your information where the information is no longer necessary for the purpose for which it was collected)
- to withdraw any consents you have provided in respect of our use of your information
- to request a copy of the information you have provided to us, to use for your own purposes (often called your right to data portability) and
- to lodge a complaint with the relevant data protection supervisory authority in your jurisdiction.

If you have subscribed to us or agreed to be on a contact list to receive information from us, you can ask to be removed at any time by using the unsubscribe link included in any e-communications or by emailing reception@rochecom.com

If you have any questions about these rights, or you would like to exercise any of them, please contact us *by submitting a request to* [**reception@rochecom.com**](mailto:reception@rochecom.com) . Additional details of how to get in touch can be found on our website.

6. How long do we keep your information?

Data will generally be stored for up to 6 years.

We may, however, keep personal data for longer than 6 years if we need it to fulfil our contractual obligations to you, the law requires us to maintain it for a longer period or you have not withdrawn your consent. Personal data of employees and freelancers will be kept for no longer than is necessary, and that period of time will be determined with reference to applicable statutory limitation periods.

Any other information will be kept for no longer than is necessary and will be determined with reference to applicable statutory limitation periods in your jurisdiction, or otherwise as agreed between us.

We will keep our retention policies under review to ensure that data is not stored for longer than is strictly necessary.

7. Protection of Data

We are committed to protecting your personal data and to keeping it safe and confidential. We will therefore ensure that appropriate technical and organisational physical, electronic and procedural safeguards are implemented to protect it. Access to your personal data will also be limited to our employees and certain third parties who process it on our behalf.

How to contact us?

If you have any questions about this Privacy Notice or the information we hold about you, you can contact us:

by email: **reception@rochecom.com**

by Post

Roche Communications
5th Floor (North) Tennyson House
159-165 Great Portland Street
London, England W1W 5PA
United Kingdom

8. Changes to this Privacy Notice

We keep this Privacy Notice under regular review and we will place any updates on this webpage.

We maintain a licence with the ICO (Information Commissioners Office) ZA 339892 and are committed to appropriate actions and good practise in all aspects of data protection and compliance

This Privacy Notice was last updated on 14th May 2018.

Appendix A

We collect data about how you interact with our Digital Applications through the use of cookies and other similar technology.

What is a cookie?

Cookies are small text files containing small amounts of information which are downloaded to your computer or mobile device when you access our Digital Applications. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie.

Why do we use cookies?

Cookies are useful because they allow our Digital Applications to recognise your device. We use them to make our Digital Applications work, or work more efficiently, as well as to store information about your preferences or past actions. You can find out more information about cookies at www.allaboutcookies.org.

We also use cookies to enhance and improve your online experience (for example, by remembering your language and/or preferences) and to understand better how our Digital Applications are used. Cookies may tell us, for example, whether you have visited our Digital Applications before or whether you are a new visitor. They can also help to ensure that adverts seen online are more relevant to you and your interests. They cannot be used to identify you personally.

What types of cookies do we use and how?

We use the following types of cookies:

- 'session cookies': these are allocated to your device only for the duration of your visit to our Digital Applications – they are deleted automatically once you close your browser and
- 'permanent cookies': these survive after your browser is closed and can remain on your device for a period of time – they can be used by our Digital Applications to recognise your computer or mobile device when you open your browser and browse the internet again.

These cookies may be served directly by us to your computer or mobile device (so-called 'first-party cookies') or by one of our service providers (so-called 'third-party cookies'). A first-party cookie is only used by us to recognise your computer or mobile device when you revisit, or access content via, our Digital Applications. Third-party cookies can be used to recognise your computer or mobile device across different websites (and are most often used for analytical and advertising purposes).

What purposes do we use cookies for?

We use cookies for the purposes stated below:

- essential cookies: these are essential to provide you with services available through our Digital Applications and to use some of their features, such as access to secure areas – without these, providing core functionality, such as transactional pages and secure login accounts, would not be possible
- analytics cookies: these are used to collect information about how you and others use our Digital Applications – the information gathered does not identify you and is aggregated – this includes the number of visitors to our Digital Applications, the websites or other applications that referred them to our Digital Applications and the pages that they visited on our Digital Applications – we use this information to help operate our Digital Applications more efficiently, to gather broad demographic information and to monitor the level of activity on our Digital Applications
- functionality cookies: these allow our Digital Applications to remember choices you make (such as your user name or the region you are in) and provide enhanced, more personal features – they can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customize – they may also be used to provide services you have asked for, such as watching a video or commenting on a blog – the information these cookies collect may be anonymised and they cannot track your browsing activity on other websites
- performance cookies: these collect information about how you and others use our Digital Applications, for example, which pages are most visited, if error messages come up and how effective our online promotions are – they are only used to help us improve how our Digital Applications work and to ensure ease and speed of use
- marketing cookies: these facilitate online advertising – our Digital Applications, for instance, may use remarketing with Google – third-party vendors, including Google, use these cookies to tailor adverts based on someone's past visits to our Digital Applications and serve these across the web – you can set preferences for how Google advertises to you using the Google Ads Settings and
- social media cookies: these are used when you share information using a social media sharing button or "like" button on our Digital Applications or you link your account or engage with our content on or through a social networking site such as Facebook, Instagram, Twitter or Google+ – the social network will then record that you have done this and the information may be linked to advertising activities such as targeted banners.