

## Total Politics Group Privacy Policy

Due to the recent acquisition of media, events and training services brands from Dods Group Ltd (a subsidiary of Merit Group plc), your data controller is now Political Engagement Ltd, a subsidiary of Political Holdings Limited and part of the Total Politics Group.

### ABOUT US

Political Engagement Ltd (“we”, “our”, “us”) respect the privacy of our website users, readers and customers (“you”) and we are committed to protecting the privacy and security of your personal information.

1. **PURPOSE** This Privacy Notice has been prepared to assist you in understanding what information we collect about you and how that information is used by us and by third parties.

### 2. KEY TERMS

2.1 When we refer to Data Protection Legislation we mean the United Kingdom General Data Protection Regulation (“UK-GDPR”); that took effect on January 31, 2020, and the Data Protection Act 2018 which has been amended to be read in conjunction with the UK-GDPR.

2.2 personal information is information that can be used to identify or contact a specific individual, such as a name, address, telephone number, email address, etc, and also online identifiers and location data such as IP addresses and mobile device IDs.

2.3 special category data means personal information revealing your racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; genetic data; biometric data; data related to your health or data concerning your sex life or sexual orientation; and criminal convictions or involvement in criminal proceedings.

2.4 A data controller is someone who decides why personal data is to be collected and how it will be used and treated.

### 3. CONTACT US

3.1 If you have any questions regarding this Privacy Notice you can contact us at: Political Engagement Ltd, [customer.service@totalpolitics.com](mailto:customer.service@totalpolitics.com)

3.2 If you are unhappy with how we handle your personal information you can write to us using the contact details noted above; and/or notify the Information Commissioner’s Office (ICO) (please see: <https://ico.org.uk/concerns/> for more information).

### 4. HOW DO WE USE YOUR PERSONAL INFORMATION?

<b>Method of Collection</b>	<b>Type of Information</b>	<b>Lawful Basis for Processing</b>
Website registration	Personal information, for example, your: - name, - username, - job title, - work address,	Legitimate interest or consent

	<ul style="list-style-type: none"> <li>- employer,</li> <li>- phone number,</li> <li>- payment details, and</li> <li>- email address</li> </ul>	
Website interfacing (i.e. posting comments on articles/group discussions)	Details such as your name and username	Legitimate interest or consent
Website usage including for monitoring and improving our websites	Information transmitted by your computer, including your <ul style="list-style-type: none"> <li>- IP address,</li> <li>- browser data,</li> <li>- traffic and location data, and</li> <li>- information we receive from cookies or from our use of website analytics services.</li> </ul>	Legitimate interest
Contacting us through the website (emailing us or commenting through website)	Record of your email/comment, name, and email address	Legitimate interest
Surveys	Information included in survey answers and your name, email address, employer and job title and any other information that you provide.	Consent
Whitepapers, research, and webinars	Your name, job title, phone number, employer, and any other information that you provide.	Consent or fulfilment of a contract
Newsletters and bulletins or updates on our products and services	Your name, job title, phone number, employer, and any other information that you provide.	Consent or legitimate interest
Phone	Recording and details of your call, name, email address, phone number, gender, address, employer, job title and any other information you provide.	Consent or fulfilment of a contract or legitimate interest
Email or social media correspondence	Records of all information you provide in email or social media contact, including your: <ul style="list-style-type: none"> <li>- name,</li> <li>- email address,</li> <li>- phone number,</li> <li>- gender,</li> <li>- address,</li> </ul>	Consent or fulfilment of a contract or legitimate interest

	<ul style="list-style-type: none"> <li>- employer,</li> <li>- job title, and</li> <li>- any other information you provide/requested in the events registration form.</li> </ul>	
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4.1 We may receive information about you from third party sources including customers, business partners, sub-contractors in technical services, advertising networks, marketing list brokers and information available online in the public domain. We use reasonable endeavours to ensure that the third party has a lawful basis for the processing of such information in accordance with the terms of this Privacy Policy.

4.2 We collect publicly available information including names, job title, employer, telephone, social media and business email address contact details to allow us or third parties to send you information about our goods and services. We may also use our legitimate interest to provide this information to third parties. You can request to stop receiving such communications at any moment pursuant to relevant Data Protection Legislation by using the unsubscribe links in the footer of the email or by contacting us directly.

4.3 We may process personal data on behalf of certain events partners or clients. In such cases this should be made apparent to you in the event’s Privacy Notice.

## 5. HOW WE MAY USE YOUR INFORMATION

5.1 As a group company we share centralised systems and platforms within the Total Politics Group. Unless you object to such processing, or request us not to, the below table describes (i) the information shared with our group companies; and (ii) the type of commercial communications you may receive from our group companies.

<b>Total Politics Group Company</b>	<b>Commercial Communication</b>	<b>Group Companies information shared with</b>
Political Engagement Limited	Email sales and marketing, Telephone sales and marketing, PPC advertising, Print advertising, Display advertising, Direct marketing (e.g. printed invitations), and Social media.	Holyrood Communications Limited

5.2 We may use, process and share your personal data:

5.2.1 where we have your consent;

5.2.2 where necessary for:

5.2.2.1 performance of any contract to which the data subject is party (and taking steps at the data subject’s request with a view to entering a contract);

5.2.2.2 compliance with any legal obligation;

5.2.2.4 administration of justice or performance of a task carried out in the public interest or in the exercise of our official authority; and/or

5.2.2.5 our legitimate interests, including but not limited commercial, marketing, intragroup transfers or IT security. We will only use this legal basis to process your data in ways that you would reasonably expect and have a minimal privacy impact.

5.2.3 in respect of special categories of personal data:

5.2.3.1 where we have your consent;

5.2.3.2 where necessary for protection of vital interest (where consent cannot be given or where it is not reasonable to expect consent to be obtained or where consent is unreasonable withheld);

5.2.3.3 where necessary for, or in connection with, legal proceedings, obtaining legal advice or establishing, exercising or defending legal rights; and/or

5.2.3.4 where the data has been manifestly made public as result of steps deliberately taken by the applicable individual.

## 6. WHO WE SHARE YOUR INFORMATION WITH

6.1 We may disclose your personal information to third parties in the following circumstances:

6.1.1 in accordance with sections 4.2 and 5.2 above;

6.1.2 to service providers who manage aspects of our operations (e.g. technical services for our Websites, or those that assist us in providing services to you);

6.1.3 in order to investigate or respond to problems or inquiries or defend our interests, to our auditors, brokers, legal advisors, professional indemnity insurers, and other professional advisors;

6.1.4 in the event of a sale, merger, acquisition, partnership or joint venture;

6.1.5 in order to comply with any legal obligation, or where it is required by order of a court or other judicial, regulatory or law enforcement body or in order to enforce or apply the Websites' terms of use and/or other agreements between you and us; or

6.1.6 to protect our or a third party's rights, property or safety.

6.2 We may also pass aggregated information on the use of the Websites to our group companies or third parties but this will not include information which could be used to identify you.

6.3 If you (i) register to attend an event we organise; and/or (ii) sign up for a webinar, whitepaper or bulletin, we may provide the contact information you provide to sponsors, event partners, exhibitors and/or a venue for an event who may contact you from time to time for their marketing purposes. A list of event sponsors will be available on each event website. Further details of how we hold and use personal data for our events are provided in a Privacy Notice, which is available on each events registration page.

## 7. DIRECT MARKETING COMMUNICATIONS

7.1 We may use our legitimate interests to contact relevant business addresses (e.g. [firstname.surname@business.co.uk](mailto:firstname.surname@business.co.uk)) for marketing purposes without prior agreement, provided we believe the messages will be of interest and relevance to you.

7.2 You have the right at any time to ask us not to use your personal data for marketing purposes (including the disclosure of personal data to third parties for marketing purposes). If you do not wish to receive such communications or wish to object to such transfer to third parties for marketing purposes or to our direct marketing, please contact us at [customer.service@totalpolitics.com](mailto:customer.service@totalpolitics.com)

8. INTERNATIONAL TRANSFERS OF DATA Political Engagement Limited as part of the Total Politics Group is a global business which means personal information may be accessed by our group companies or certain service providers from locations outside the European Economic Area (EEA). To ensure your information is given substantially similar protection as are provided in the EEA we use safeguards approved by the European Commission and have in place international data transfer agreements between our companies and our service providers where data is transferred outside the EEA.

## 9. STORAGE AND SECURITY OF YOUR INFORMATION

9.1 Once we have received your information, we will use, and keep up to date, strict and appropriate measures, procedures and security features (technical or otherwise) to ensure the security of personal information and to try to prevent access by unauthorised persons and any unlawful processing, accidental loss, destruction or damage, including the implementation of an appropriate system security policy.

9.2 We retain the information you provide us for marketing purposes for three years from last contact. For all other personal information provided, we retain it for the length necessary for the purposes for which the information was provided and as permitted by applicable laws. Where the information relates to a contract or our legal obligations it is retained for 6 years. We may retain the information once the purpose expired where we have a legitimate business ground to do so. The length of retention will depend on the purposes for which it is retained, though we will endeavour to delete or securely destroy your personal information where we no longer require it.

9.3 Although we take reasonable measures to protect your personal information, we cannot guarantee the security of your data transmitted to the Websites because this transmission is not under our control.

## 10. LINKS TO OTHER WEBSITES

The Websites may contain links to other websites owned and operated by third parties. These third-party websites will have their own privacy and cookie policies that will govern the use of information you submit whilst visiting them. We do not accept any responsibility or liability for these policies or the privacy practices of such third-party websites. Please check the policies before submitting any personal information to these websites. Your use of third-party websites is at your own risk.

## 11. UPDATING YOUR PERSONAL INFORMATION

Please contact us at [customer.service@totalpolitics.com](mailto:customer.service@totalpolitics.com) as soon as possible after there is any change to your personal details. Where possible, we aim to contact you on a regular basis to ensure the personal details we hold about you are accurate.

## 12. UPDATING OUR PRIVACY POLICY

We may update or amend this Privacy Notice from time to time, including in order to make clarifications or modifications to it or to reflect changes to legislation. Any changes to this Privacy Notice will be posted here and such changes will become effective as soon as they are posted.

## 13. YOUR RIGHTS

You have certain rights under the Data Protection Legislation which can be exercised by contacting us at: [customer.Service@totalpolitics.com](mailto:customer.Service@totalpolitics.com) including:

13.1 The right to access the personal information held about you by making a subject access request;

13.2 To have any inaccuracies in your personal information corrected;

13.3 To have your personal information erased, or for our use of it to be restricted (for example, if your preferences change, or if you don't want us to send you the information you have requested);

13.4 Where you have provided consent, to request to withdraw such consent at any time;

13.5 If you wish to exercise your right to object to all processing for the purposes of direct marketing;

13.6 Please contact us using the details set out above if you would like exercise any of these rights.  
This Privacy Policy was last updated in May 2023