



Document Control

Contents	Details
Title	SAMGarde Privacy Policy
Customer	Operational
Document Name	SAMGarde Privacy Policy
Document Version No.	v2.2
Author	(Group Counsel)
Document Version Date	August 1 st 2018
Classification	External
Engagement Reference number:	Na

COPYRIGHT NOTICE.....	3
PRIVACY POLICY.....	3
WHAT THIS POLICY COVERS.....	4
COLLECTION AND USE OF PERSONAL INFORMATION.....	5
WEBSITE REGISTRATION.....	6
COOKIES	7
EVENTS, SURVEYS AND PROMOTIONS	8
JOB APPLICATIONS.....	9
USER DATA SUPPLEMENTATION	10
SOCIAL MEDIA	11
NEWSLETTERS, REQUESTED GUIDES AND WHITEPAPERS	12
LOG DATA.....	13
DEVICE INFORMATION	14
LOCATION INFORMATION	15
CRM (CUSTOMER RELATIONSHIP MANAGEMENT).....	16
HOW WE USE INFORMATION	17
THIRD PARTY DATA	18
ADDITIONAL INFORMATION PROVIDED TO SAMGARDE	19
OPTING-OUT OF EMAIL AND SELECTING EMAIL PREFERENCES.....	20
TESTIMONIALS.....	21
DATA RETENTION.....	22
HOW WE SHARE & DISCLOSE INFORMATION	23
THIRD PARTY WEBSITES	24
SURVEYS.....	25
CONSENT	26
LEGAL DISCLAIMER.....	26
INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION.....	27
SECURITY	28
AGE LIMITATIONS	29
CHANGES TO THIS PRIVACY POLICY	30
YOUR RIGHTS.....	31
DATA PROTECTION AUTHORITY.....	32
CONTACT SAMGARDE	33

Copyright Notice

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PRIVACY POLICY

Effective: August 1, 2018

This Privacy Policy describes what data SAMGarde collects from you, how we use it and what choices you have with respect to the information we hold on you.

This Privacy Policy reflects changes in data protection law – the General Data Protection Regulation (GDPR), which takes effect across the European Union from 25 May 2018.

To help make our policy clear we have done the following:

organised the policy into the sections listed in the Table of Contents below and provided a series of examples that help illustrate how the policies may be implemented by SAMGarde.

When we refer to “SAMGarde”, we mean the SAMGarde entity that acts as the controller or processor of your information.

What this Policy Covers

Please read this Policy carefully as by accessing SAMGarde's website and sub-domains you agree with this policy. This policy governs any details voluntarily provided by users through the website and by other means (e.g. conference and events, etc.) and how we treat personally identifiable information collected from our visitors and users. It also describes the choices available to you regarding our use of your personal information and how you can access and update this information.

SAMGarde respects your privacy and is committed to protecting the personal information that you share with us. This policy describes how we collect use and share your personal information.

Collection and Use of Personal Information

Personal information means any information that may be used to identify an individual, including, but not limited to, a first and last name, email address, a company or home postal or other physical address, other contact information, title, gender, occupation, industry, personal or product interests, other information when needed to provide a service you requested.

Generally, you can visit SAMGarde's website and sub-domains without revealing any personal information about yourself. However, if you choose not to register on the website you may not be able to utilise all of the website's functionality. For example, you may not be able to download or request information or receive our regular newsletter "Independent SAM". Where required, any personal information we collect from you that is voluntarily provided, may include your personal contact information and/or your company contact information.

SAMGarde will use this information to reply to your enquiries, to provide you with requested products and services, to set up your subscription to the SAMGarde Foresight newsletter, and to contact you regarding new products and services. By accessing information from SAMGarde and voluntarily providing us with the requested personal information, you consent to the collection and use of the information in accordance with this privacy policy.

SAMGarde does not share personal information with unrelated companies except as provided for in this Policy, as necessary in connection with internal information processing activities, or to comply with applicable law. SAMGarde recognises that your personal information is confidential and takes reasonable measures to protect your personal information while it is in SAMGarde's possession.

SAMGarde collects and receives personal and company information and data on prospective, current and lapsed customers for legitimate business purposes only. This data is held in SAMGarde's customer relationship management system (CRM). The data is collected in a variety of ways:

Website Registration

When you browse our website, you do so anonymously. We log your IP address (your computer's internet address) to give us an idea of which part of our website you visit and how long you spend there. We do not link your IP address to any personal information unless you have provided your details through registering for information or requesting information. As with other commercial websites, SAMGarde's website may use a "cookie" to collect information about how you use the site (see section on 'Cookies' for further information).

Cookies

SAMGarde uses 'Cookies' and similar technologies which are small text files placed on your computer or device when you visit a website. SAMGarde uses cookies to gather demographic information about its users, track website traffic trends and analyse users' navigation around the website so that SAMGarde can improve the website and provide a better and personalised service according to your personal preferences and interests. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our website or service.

Events, Surveys and Promotions

SAMGarde collects personal information when you:

- register with SAMGarde and request information e.g. whitepapers, guides, newsletters, etc. or on SAMGarde's products or services,
- register to attend an event/webinar/conference via SAMGarde and ask to be included in an email or give your consent to SAMGarde to provide you with further information at an event or conference where SAMGarde is exhibiting or sponsoring,
- participate in an online survey or prize draw and other product/service promotions, or submit your information to SAMGarde for any other reason.

From time to time, SAMGarde receives personal information from business partners and vendors. SAMGarde only uses such information if it has been collected in accordance with acceptable privacy practices consistent with this policy and applicable laws.

Job Applications

If you are applying for a position with SAMGarde via our website, you may be asked to upload and submit your Curriculum Vitae (CV), contact details and any other relevant information related to your educational background and employment history for the position. This information will be used solely to inform the recruitment process and will not be disclosed or shared with third parties that are not involved in the recruitment process. SAMGarde disclaims any legal duty to verify the accuracy of any personal information that you provide.

User Data Supplementation

We may receive information about you from other sources, including publicly available databases or third parties from whom we have purchased data, and combine this data with information we already have about you. This helps us to send you information on our services based on your interests and preferences, update, expand and analyse our records and identify new customers.

Examples of personal information that may be obtained from public sources or purchased from third parties and combined with information we already have about you, may include information on your company address and about you from a third-party source, to append missing information to existing leads from website lead registration forms and new leads from purchased marketing data from third parties.

If you have questions about this practice, please contact us at marketing@samgarde.com

Social Media

The SAMGarde Website includes Social Media features, such as the LinkedIn and Twitter like/share buttons. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our website. Your interactions with these features are governed by the privacy policy of the company providing it.

Newsletters, Requested Guides and Whitepapers

If you wish to subscribe to SAMGarde newsletters and receive guides and whitepapers, we will use your name and email address to send these to you. Out of respect for your privacy, we provide you a way to unsubscribe and change your email preferences for information you receive from SAMGarde in each newsletter and email we send to you. Please see the 'unsubscribe' and the 'update your email preferences' link at the bottom of each newsletter and email you receive from SAMGarde. Your email address and registration details are managed and stored in a third-party system (see CRM section).

Log Data

As with most websites and technology services delivered over the Internet, our servers automatically collect information when you access or use our website and record it in log files. This log data may include the Internet Protocol (IP) address, entry, exit and other web pages visited on the website, click data, browser type and settings, the date and time stamp, information about browser configuration and plugins, language preferences and cookie data.

Device Information

SAMGarde collects information about devices accessing the website including type of device, what operating system is used in accordance with the consent process provided by your device. Whether we collect some or all of this other Information often depends on the type of device used and its settings. This information may be used to improve on the way SAMGarde presents and delivers information through different devices.

Location Information

We receive information from you and other third-parties that helps us approximate your location. We may, for example, use an IP address received from your browser or device to determine approximate location.

CRM (Customer Relationship Management)

Personal information used for marketing purposes is held in our CRM (Customer Relationship Management) system. Only a limited number of individuals in SAMGarde have access to the CRM. This restricted access allows SAMGarde to control how data is collected, used and shared. We only use third-party systems whose privacy policies are consistent with ours or who agree to abide by our policies with respect to personal information.

How We Use Information

SAMGarde uses your personal information for several general purposes to:

- fulfil your requests for certain products and services, personalise your experience on our website,
- keep you up to date on the latest news, product and services, special offers, or any other relevant information we think you'd like to hear about either from us, our partners or the industry,
- better understand your needs and provide you with better services, contact you for market research,
- track the impact of some of our marketing programs, and investigate and help prevent security issues and abuse.

Third Party Data

SAMGarde may receive data about organisations, industries, website visitors, marketing campaigns and other matters related to our business from partners or others that we use to make our own information better or more useful. This data may be aggregated with our own data to append personal information we hold and use for legitimate business purposes, for example, how well an online marketing or email campaign performed.

Additional Information Provided to SAMGarde

We receive personal information when you have submitted to our website or if you request information from SAMGarde, participate in an event, survey or other marketing activity, apply for a job, request support, interact with our social media accounts or otherwise communicate with SAMGarde.

SAMGarde uses other Information in furtherance of our legitimate interests in operating our services, websites and business.

Opting-out of Email and Selecting Email Preferences

If you would like to be removed from our database, please contact marketing@samgarde.com and we will ensure that you are opted out of receiving future mailings from our mailing lists at any time. Alternatively, you can 'unsubscribe from all future emails' via the link found in the footer of all marketing emails that have been sent to you.

If you would like to select the type of information you receive from marketing, you can do so by the link to update your 'email preferences', found in the footer of marketing emails that have been sent to you.

Testimonials

We may display personal testimonials of satisfied customers on our site in addition to other endorsements. With your consent we may post your testimonial along with your name. If you wish to update or delete your testimonial, you can contact us at: marketing@samgarde.com

Data Retention

SAMGarde does not retain all of the personal information that SAMGarde receives. SAMGarde will only retain personal information in accordance with applicable law and for legitimate business use. Your personal information will be retained for as long as the information is required by SAMGarde for SAMGarde's legitimate business purposes or to comply with legal requirements. When required by law, SAMGarde will also take reasonable steps to rectify, anonymise or delete personal information that is inaccurate or incomplete, or which is no longer required to be retained by SAMGarde.

How We Share & Disclose Information

Your personal information is never shared outside SAMGarde without your permission, except under conditions explained below. Inside SAMGarde your data is stored in controlled servers with limited access and hosted with secure third-party cloud service providers.

In these circumstances, access to your personal information is restricted to SAMGarde and companies who provide support and work on behalf of SAMGarde. Your personal information may be stored and processed in the United States or any other country where SAMGarde and its partners are located. Your personal information is governed by this policy and is bound by the appropriate confidentiality and data transfer agreements and applicable laws.

SAMGarde may otherwise disclose your personal information when:

- SAMGarde business partners who work on behalf of or with SAMGarde require your personal information to deliver a product or service; they are prohibited from using that information for any other purpose.
- Third parties who work on behalf of SAMGarde provide products and services requested by you. We will share personal information for these purposes only with third parties whose privacy policies are consistent with ours or who agree to abide by our policies with respect to personal information.
- We have your express consent to share the information for a specified purpose. We need to respond to court orders or such other legal process.
- We need to protect the personal safety of the users of our websites or defend the rights or property of SAMGarde.

Third Party Websites

SAMGarde's website contains links to other sites. SAMGarde does not share your personal information with external websites and is not responsible for their privacy practices. You may want to refer to the privacy policies of those companies for further detail.

Surveys

SAMGarde may use a third-party service provider to conduct surveys or contests; that company will be prohibited from using our users' personal information for any other purpose. We will not share the personal information you provide through a contest or survey with other third parties unless we give you prior notice and the choice to do so.

Consent

If you do not consent to the collection, use or disclosure of your personal information as outlined in this policy, please do not provide any personal information to SAMGarde. If you have provided personal information to SAMGarde and no longer consent to its use or disclosure as outlined herein, please notify SAMGarde at: marketing@samgarde.com

Legal Disclaimer

There may be circumstances under which SAMGarde may be legally compelled to disclose your personal information. These circumstances may include, among others, situations where disclosure is required by law applicable to SAMGarde, or necessary to comply with an order of a court or governmental agency or similar legal process, or necessary for matters of safety and security. In such cases, SAMGarde will make good faith efforts to provide only the information which is the subject of the official order or request.

If SAMGarde is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our website of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

International Transfers of Personal information

Personal information collected by SAMGarde may be transferred to SAMGarde offices, business partners or third-party service providers who are established in jurisdictions without comprehensive data protection laws. If you do not want your personal information to leave your home country, please do not use the website and do not provide your information to SAMGarde.

BY PROVIDING YOUR PERSONAL INFORMATION TO SAMGARDE, YOU EXPLICITLY CONSENT TO THE TRANSFER OF YOUR INFORMATION OUTSIDE OF YOUR COUNTRY OF RESIDENCE.

Security

SAMGarde takes security of data very seriously. SAMGarde works hard to protect the information you provide from loss, misuse, and unauthorised access or disclosure. These steps take into account the sensitivity of the Information we collect, process and store, and the current state of technology. Given the nature of communications and information processing technology, SAMGarde cannot guarantee that Information, during transmission through the internet or while stored on our systems or otherwise in our care, will be absolutely safe from intrusion by others. In certain areas of our websites, as identified on the site, SAMGarde uses industry-standard SSL- encryption to protect data transmissions. Once the data has been transmitted, the services that utilise the data also use encryption technologies to ensure the data is secure. Your personal information is safeguarded from unauthorised access, through access control procedures, network firewalls and physical security measures on-premise and in the cloud.

Age Limitations

To the extent prohibited by applicable law. If you learn that anyone younger than 16 has unlawfully provided us with personal information, please contact us and we will take steps to delete such information.

Changes to This Privacy Policy

SAMGarde may change this policy from time to time. Laws, regulations and industry standards evolve, which may make those changes necessary, or we may make changes to our business. We will post the changes to this page and encourage you to review our policy to stay informed. If we make changes that materially alter your privacy rights, SAMGarde will provide additional notice, such as via email or through the services we provide. If you disagree with the changes to this policy or wish to request the removal of personal information then please contact: marketing@samgarde.com

Your Rights

Individuals located in certain countries, including the European Economic Area, have certain statutory rights in relation to their personal information. Subject to any exemptions provided by law, you may have the right to request access to Information, as well as to seek to update, delete or correct this Information.

To the extent that SAMGarde's processing of your personal information is subject to the General Data Protection Regulation, SAMGarde relies on its legitimate interests, described above, to process your data. SAMGarde may also process any other Information that constitutes your personal information for direct marketing purposes and you have a right to object to SAMGarde's use of your personal information for this purpose at any time. SAMGarde takes your right to be forgotten very seriously. If you would like to be removed from our mailing lists then please contact: marketing@samgarde.com

Data Protection Authority

Subject to applicable law, you also have the right to:

1. restrict SAMGarde's use of information that constitutes your personal information and,
2. lodge a complaint with your local data protection authority.

If you are a resident of the European Economic Area and believe we maintain your personal information within the scope of the General Data Protection Regulation (GDPR), you may direct questions or complaints to our lead supervisory authority. In the UK this is the Information Commissioners Office (ICO). It is the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

More information can be found here: <https://ico.org.uk/> (<https://ico.org.uk/>)

Contact SAMGarde

Please feel free to contact SAMGarde if you have any questions about this Privacy Policy or SAMGarde's practices, or if you are seeking to exercise any of your statutory rights. You may contact us at marketing@SAMGarde.com.

Alternatively contact us in writing to:

SAMGarde (Holdings) Limited.
C/O Womble Bond Dickinson (UK) LLP
4 More London Riverside
London
SE1 2AU
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