



## **MyLife Digital Ltd (“MyLife Digital Group”) Privacy Policy**

**Effective Date: May 2018**

### **1 Introduction**

This privacy policy relates to how MyLife Digital Group uses your information that has been collected through a variety of mechanisms including the MyLife Digital website and its associated websites, events, client or partner referrals or publicly available information. This information is collected for various purposes including the promotion of MyLife Digital Group (including Wood for Trees, PGIR t/a Insight Analysis and Consentric) and its products and services.

Your privacy is important to us. This policy informs you what personal information we collect from you and how we use it.

### **2 Information We Collect**

MyLife Digital Group collects your information to provide you with the best experience of our products and services. Some of this data will be provided by you, for example, when you complete a website contact form or hand a business card to us at events and some will be collected about you, for example, via cookies, from third party public sources or when you open one of our emails.

#### Information you provide to us:

- information that you provide to us when contacting us through our websites (including name, address, email address, direct dial phone number, mobile phone number company/organisation name and job title);
- information that you provide to us for the purpose of requesting information, including sales and marketing communications, subscribing to our email notifications or newsletters (including name, address, email address, direct dial phone number, mobile phone number company/organisation name and job title);
- information contained in or relating to any communication that you send to us or send through our websites (including the communication content)
- information you provide to us when entering a contractual agreement (including billing details and signature)
- any other personal information that you choose to send to us.

#### Information that we collect about you:



- metadata information about your computer and your visits to and use of our websites (as per our cookie policy). For example, when someone visits our websites we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various pages on our sites. This general information is only processed in a way which does not identify anyone. If you book a demo or request we contact you via our websites it is possible to link the online identifier to you and we would only use this information to better understand the pages you viewed on our site and the campaign that referred you to our sites. If an individual does not want us to be able to link them back to this information they can contact us directly on [contact@mylifedigital.co.uk](mailto:contact@mylifedigital.co.uk) rather than completing the online form;
- information about you that we collect from other public sources such as your Twitter Handle or LinkedIn Profile. For example, Company Name, Company Address, Sector, Job Title, Company Size and Birthday;
- information provided to us by our email service provider which includes when you open one of our emails and the links you clicked on.

### **3 Use of Your Data**

We will use your data for the purposes specified in this policy or the relevant pages of the websites in order to provide you with information, products and services that you have requested of us. We may also use your personal information to comply with our legal obligations.

#### **3.1 We may use your personal information to:**

- (a) administer our websites, and business;
- (b) personalise our websites for you;
- (c) enable your use of the services available on our websites;
- (d) send you email notifications, newsletters and sales and marketing communications;
- (e) deliver a better or more tailored customer experience;
- (f) deal with enquiries and complaints made by or about you relating to our websites;
- (g) keep our websites secure and prevent fraud;
- (h) verify compliance with the terms and conditions governing the use of our websites;
- (i) to optimize our marketing campaigns;
- (j) to meet any contractual obligations that we have agreed with you;



- (k) to provide Customer Support, and the notification of any changes to MyLife Digital Group's products or services, solving issues via support portal, phone or email including any bug fixing.

#### **4. Our Legitimate Interests**

MyLife Digital has assessed that there is a legitimate interest to proactively share information on its products and services with you that are likely to benefit you and your organisation (of which you may not be aware in the absence of such communications).

MyLife Digital Group is a high growth technology and data analysis business with expertise in Personal Information Management. MyLife Digital Group also has specific domain expertise in the Not for Profit, Charities and Elite Sports sectors for providing Data Analysis and Performance Improvements. To grow and generate profits, MyLife Digital Group needs to sell and market its products and services to new potential customers (prospects), additional products and services to existing customers and attract partners who want to sell our products. Generating profits will enable MyLife Digital Group to contribute to the economy by paying taxes in the UK, pay its staff and reward them for the great work they do and reward its investors for having the confidence to invest.

To achieve these aims MyLife Digital Group has a legitimate interest to process personal data to identify potential customers and partners who are in job roles that are likely to require its products and services and communicate this to them, either by phone, email or post. We will share your personal information with our other group companies as referenced in Section 1, so that those companies may market their products and services to you. If you choose to object to these communications, we will update your permissions accordingly. To establish Legitimate Interest as a lawful basis for processing personal data for these purposes a Legitimate Interest Assessment was conducted and is available [here](#)

Subject to this, we will not, without your express consent, supply your personal information to any third party outside of the MyLife Digital Group for the purpose of their or any other third party's direct marketing.

#### **5. Disclosing Personal Information**

We may disclose your personal information to relevant parties as described in this policy.

- 5.1 We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this policy.
- 5.2 Where relevant, we may disclose your personal information to any member of our group of companies namely, MyLife Digital Limited (including Consentric as



a registered trademark and brand name), Wood for Trees Ltd and PGIR t/a Insight Analytics, insofar as reasonably necessary for the purposes set out in this policy.

5.3 We may disclose your personal information:

- (a) to the extent that we are required to do so by law;
- (b) in connection with any ongoing or prospective legal proceedings;
- (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
- (d) to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

5.4 Except as provided in this policy, we will not provide your personal information to third parties.

## **6 Data Storage**

6.1 MyLife Digital Group's products and services are hosted in highly secure UK data centres, which are subject to rigorous periodic inspection and independent validation of their security controls by the UK government's National Technical Authority for Information Assurance (CESG).

6.2 We also use a select number of suppliers to support the provision of our services. For example, data is processed using a customer relationship management provider, email service provider and website host provider. Where we use any such sub-processors, we undertake prior due diligence to confirm that they meet recognised adequacy standards for data protection; this includes any that are located outside of the European Union.

6.3 Personal information that you publish on our websites or submit for publication on our websites may be available, via the internet, around the world. We cannot prevent the use or misuse of such information by others.

6.4 You expressly agree to the transfers of personal information described in this Section.

## **7 Data Retention**

7.1 This Section sets out our approach to data retention, which is designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal information.



- 7.2 Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that specific purpose or those purposes.
- 7.3 Notwithstanding the other provisions of this Section, we will retain documents (including electronic documents) containing personal data:
- (a) to the extent that we are required to do so by law;
  - (b) if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and
  - (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

## **8 Security of Personal Information**

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

- 8.1 We will store all the personal information you provide on our secure (password- and firewall-protected) servers.
- 8.2 You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.
- 8.3 You are responsible for keeping the password you use for accessing our websites confidential; we will not ask you for your password (except when you log in to our websites).
- 8.4 MyLife Digital is certified to ISO27001, Cyber Essentials and IASME Governance information security standards.

## **9 Changes to This Policy**

This policy may change from time to time. The latest effective date will be highlighted at the top of the policy information.

We will update this privacy policy when necessary to reflect customer feedback, changes in our products and services or legal changes. When we post changes to this policy, we will revise the "Effective Date" at the top of the privacy policy and will describe the changes in the [Change History](#) page.

If there are material changes to the privacy policy or in how MyLife Digital Group will use your personal data, we will notify you either by prominently posting a notice of such changes before they take effect or by directly sending you a notification. We encourage



you to periodically review this privacy policy to learn how MyLife Digital Group is processing your information.

## **10 Your Control of Your Data**

### Managing how we contact you:

Your personal information belongs to you. You can adjust how we contact you for the purposes outlined in Section 3 by emailing us at [contact@mylifedigital.co.uk](mailto:contact@mylifedigital.co.uk) or by phoning us on 01225 636 280. You can also write to us at the address detailed in Section 12.

### Managing your data:

- 10.1 You may request from us, details of the personal information we hold about you and how we are processing it.
- 10.2 Where notified, we will amend your data, including where you provide us with additional information to complete your record.
- 10.3 Where you have previously consented to MyLife Digital Group using your data, you may withdraw this consent at any time.
- 10.4 You may request that we restrict the use of your data, where you believe:
  - (a) the data we hold about you is inaccurate;
  - (b) the processing of your data is not lawful;
  - (c) your data no longer needs to be used for the purpose that it was originally provided;
  - (d) where you object to the use of your data for specific purposes.
- 10.5 You may have the right to request to transfer your data in a machine-readable format to your own store or another provider.
- 10.6 Should you no longer wish to engage with MyLife Digital Group, you may have the right to request erasure of your details from our systems.

To submit any such request, please send your request by email to [dataprotection@mylifedigital.co.uk](mailto:dataprotection@mylifedigital.co.uk), or in writing to:

Holly Walker  
Data Protection Officer  
Citizen House  
Crescent Office Park  
Clarks Way  
Rush Hill  
BA2 2AF

## **11 Third Party Websites**



Our websites include hyperlinks to, and details of, third party websites.

We have no control over, and are not responsible for, the privacy policies and practices of third parties.

## **12 Data Protection Registration**

MyLife Digital Limited is registered as a data controller with the UK Information Commissioner's Office.

Our data protection registration number is ZA152609.

## **13 Our Details**

The My Life Digital Ltd website and its associated websites are owned and operated by MyLife Digital Ltd.

We are registered in England and Wales under registration number 09363196, and our registered head office is Citizen House, Crescent Office Park, Clarks Way, Rush Hill, Bath, BA2 2AF.

You can contact us by writing to the business address given above, by using our websites' contact forms, by email to [contact@mylifedigital.co.uk](mailto:contact@mylifedigital.co.uk) or by telephone on 01225 636 280.