

SPEY Media Ltd., Website Privacy Policy

Purpose of this Policy

SPEY respects your concerns about privacy. This privacy and cookie policy (“Privacy Policy”) applies to personal information we obtain from any person who visits our Website and who uses the services that we make available from any of our Sites (our “Services”).

This Privacy Policy describes the types of personal information that we might obtain through a Website, how we may use that information, with whom we may share it and the choices you may have regarding our use of the information. We also describe the measures we take to safeguard the information. Please take a moment to read and understand it.

Who are we and what do we do?

This privacy policy is issued on behalf of SPEY Media Ltd. who will be processing your data.

The terms ‘SPEY’, ‘SPEY Media Ltd’ or ‘us’ or ‘we’ refers to the owner of the website whose registered office is SPEY, Unit 14, Horizon Scotland, 2 Innovation Way, Forres Enterprise Park, Forres, IV36 2AB. We are incorporated and registered in Scotland with company number SC544857. The term ‘you’ refers to the user or viewer of our website.

How to contact us?

If you have any questions about this Privacy Policy or want to exercise any of your legal rights, please contact us using the form on our website.

What personal information do we collect?

The types of personal data that we collect and use will depend on various circumstances.

The data may include, for example:

- contact information, such as your name, postal address, email address and telephone number, the company you work for, your job title and department;
- personal information in content you provide on our Website;
- IP address (a unique identifier for your computer or other device);
- mobile device ID; and
- any other personal data we may obtain through you interacting with us.

If you apply to us for any employment, terms set out below will apply to your application.

We do not knowingly collect personal data from children under the age of 13 and we do not target our website to children under 13. If you are under 13 and want to ask us a question or

use a Website in any way that means you have to provide any personal information, please get your parent or guardian to contact us or provide the information instead.

How do we use your personal information?

We may use your personal information for a number of different purposes. In some countries, we are also required by law to state a “legal basis for processing” i.e. to tell you on what grounds we are allowed to use your information, and this is set out below:

How we will use your personal information?

Who do we share your information with?

Our legal basis for processing it.

Client services enquiries:

Our Websites allow you to contact us through an electronic enquiry form. If you submit your personal information through this form, we will use it to enable us to respond to your request. We do not share your personal information for this purpose.

It is in our legitimate interest to use your personal information in such a way to ensure that we can respond to your enquiry.

Marketing Communications:

To provide you with email marketing materials e.g. a newsletter, bulletins.

We may share your personal information with third party email marketing providers who assist us in delivering our email marketing campaigns (e.g. Mailchimp).

Where your personal information is completely anonymised, we do not require a legal basis to use it as the personal information will no longer constitute personal information that is regulated under data protection laws. However, our collection and use of such anonymised personal information may be subject to other laws where your consent is required. Please see Section 12 below for further details about cookies.

Where your personal information is not in an anonymous form, it is in our legitimate interest to use your personal information for marketing purposes.

We will only send you marketing communications via email where you have consented to receive such marketing communications, or where we have a lawful right to send this information.

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

We may share your personal information with professional advisers such as lawyers and accountants and/or governmental or regulatory authorities.

Where we use your personal information in connection with a business transition, enforce our legal rights, or to protect the rights of third parties it is in our legitimate interest to do so.

For all other purposes described in this section, it is our legal obligation to use your personal information to comply with any legal obligations imposed upon us such as a court order. Where we share your sensitive personal information, we shall obtain your consent to do so.

Our use of cookies and similar technologies

Our Website uses cookies and other technologies of which you should be aware. Please see section 12 below to find out more about the cookies we use and how to manage and delete cookies.

Third Party Links and Services

Our Websites may contain links to third party websites and services. Please remember that when you use a link to go from our Websites to another website or you request a service from a third party, this Privacy Policy no longer applies. Instead, your browsing and interaction on any other websites, or your dealings with any other third party service provider, is subject to that website's or third party service provider's own rules and policies. Please note that we do not monitor, control, or endorse the privacy practices of any third parties.

We encourage you to become familiar with the privacy practices of every website you visit or third party service provider that you deal with and to contact them if you have any questions about their respective privacy policies and practices.

How long do we keep your personal information for?

We do not keep your personal data for any specific period but will not keep it for longer than is necessary for our purposes.

Confidentiality and security of your personal information

We are committed to keeping the personal information you provide to us secure and we will take reasonable precautions 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 users of our Websites and Services.

Transfers of personal data outside the EEA

Some of the personal information we collect about you through a Website will be transferred to countries other than the country in which the information originally was collected. Those countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your personal information to other countries, we will ensure that the transfer is lawful and that there are appropriate security arrangements in place.

How to access your information and your other rights?

To the extent provided by the law of your jurisdiction, you may (i) have the right to access certain personal information we maintain about you and obtain a copy of that information, (ii) update or correct inaccuracies in that information, (iii) object to our use of your personal information, and (iv) delete your personal information from our database. To exercise these rights, please contact us using the details above. To help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to the information. A charge may be applicable before we provide you with a copy of any of your personal information that we maintain.

If you are located in the UK, EEA or Switzerland, 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.

Your right to rectification.

If the personal information we hold about you is inaccurate or incomplete, you're entitled to have it rectified. If we've shared your personal information with others, we'll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

Your right to erasure.

You can ask us to delete or remove your personal information in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable). If we've shared your personal information with others, we'll let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

Your right to restrict processing.

You can ask us to 'block' or suppress the processing of your personal information in certain circumstances such as where you contest the accuracy of that personal information or you object to us processing it. It won't stop us from storing your personal information though. We'll tell you before we lift any restriction. If we've shared your personal information with others, we'll let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

Your right to data portability.

You have the right, in certain circumstances, to obtain personal information you've provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.

Your right to object.

You can ask us to stop processing your personal information, and we will do so, if we are: (a) relying on our own or someone else's legitimate interests to process your personal information, except if we can demonstrate compelling legal grounds for the processing; or (b) processing your personal information for direct marketing.

Your rights in relation to automated decision-making and profiling.

You have the right not to be subject to a decision when it's based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for entering into, or the performance of, a contract between you and us.

Your right to withdraw consent.

If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.

Your right to lodge a complaint with the supervisory authority.

If you have a concern about any aspect of our privacy practices, you can report it to the UK Information Commissioner's Office (ICO) or any other supervisory authority or regulator responsible for data protection and privacy in your jurisdiction. If you are based in the UK, you can find details about the ICO on the ICO website at <https://ico.org.uk/concerns/> or by calling their helpline on 0303 123 1113.

About our Use of Cookies

“Cookies” are pieces of information that may be placed on your computer by a website for the purpose of collecting data to facilitate and enhance your communication and interaction with that website. Cookies contain information that is transferred to your computer’s hard drive. For more details on cookies and similar technologies please visit [All About Cookies](#).

Our Websites uses cookies to distinguish you from other users of our Website. This helps us to provide you with a good experience when you browse and also allows us to improve. By continuing to browse any of our Websites, you are agreeing to our use of cookies.

We use the following cookies:

Strictly necessary cookies.

These are cookies that are required for the operation of our Website. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

These cookies generally do not collect information that identifies a user. You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie	Domain	Purpose
_ga	.spey.scot	Google Analytics sets this cookie to calculate visitor, session and campaign data and track site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognise unique visitors.
_gid	.spey.scot	Google Analytics sets this cookie to store information on how visitors use a website while also creating an analytics report of the website's performance. Some of the collected data includes the number of visitors, their source, and the pages they visit anonymously.
_gat_UA-*	.spey.scot	Google Analytics sets this cookie for user behaviour tracking.
ga*	.spey.scot	Google Analytics sets this cookie to store and count page views.

Functional Cookies

From time to time we may also use functionality cookies. These are used to recognise you when you return to our Websites. This enables us to personalise our content for you and remember your preferences (for example, your choice of language or region).

Cookie	Domain	Purpose
__cf_bm	.vimeo.com	Cloudflare set the cookie to support Cloudflare Bot Management.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our Website.

Changes to this Privacy Policy

We may make changes to this Privacy Policy from time to time. We encourage you to review this Privacy Policy periodically to be informed of how we use your personal information.

Provisions Relating to Personal Information Supplied for Recruitment Purposes

Who will hold your data?

If you are applying to work with us we will be required to collect and process your personal data.

What will we hold and why?

When you make an application to work for us, we may collect the following information:

- contact information including name, address, email addresses and phone number;
- qualifications details e.g. skills, experience and employment history;
- current salary and benefits information;
- information about any disabilities which we need to make reasonable adjustments during the recruitment process; and/or
- information confirming your right to work in the UK.

We have a legitimate interest in processing personal data during the recruitment process and for keeping records of the process as this allows us to manage the recruitment process and assess and confirm a candidate's suitability for a role. We may also need to process data from job applicants to respond to and defend against legal claims.

In some cases, we need to process data to ensure that we are complying with our legal obligations such as checking a successful applicant's eligibility to work in the UK before employment starts.

Sensitive and special categories of data

If your application to work for us is successful, we may also obtain and process special categories of information such as ethnic origin, sexual orientation or religion/belief so that we can monitor the effectiveness of our non-discrimination and inclusivity policies.

We may also collect information regarding disabilities to make reasonable adjustments for candidates who require it. We process this information to carry out our obligations and exercise specific rights in relation to employment. This information will only be collected with your further consent.

Depending on the role, we may also need to obtain information concerning past criminal convictions or carry out financial checks to comply with contractual obligations to clients or regulatory requirements as an employer

What if I am not successful?

If your application is unsuccessful, we may keep your personal data on file in case there are future employment opportunities for which you may be suited. The organisation will ask for your consent before it keeps your data for this purpose and you are free to withdraw your consent at any time.

Where do you collect the data from?

We may collect your data from the following sources:

- your CV;
- recruitment agents you are using;
- identity documents you provide to us;
- interviews with you; and/or
- once you have been offered and accepted a role we may, with your consent, collect data from:
 - referees/previous employers
 - background checker providers/criminal records checks (if applicable).

Who will see the data?

Your information may be shared internally for the purposes of the recruitment process. This includes members of the team, interviewers and managers in the relevant business area.

We will not share your data with third parties, unless your application is successful and you are offered employment. We will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary

background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.

How will the data be stored and for how long?

Data will be stored in a range of different places, including our IT systems (including email) which includes the holding of emails on servers which may be outside the EEA.

If your application is unsuccessful, we will hold your data on file for 3 months after the end of the relevant recruitment process. If you agree to allow the organisation to keep your personal data on file, the organisations will hold your data on file for a further 12 months for consideration for future employment opportunities. At the end of that period or once you withdraw your consent, your data will be deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment in accordance with our internal retention policy, of which you will be notified.

What if I don't provide personal data?

You are under no statutory or contractual obligation to provide data to us during the recruitment process. However, if you do not provide the information, we may not be able to process your application properly or at all.

Access to your personal data and other rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the organisation to change incorrect or incomplete data;
- require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please use the contact details below. If you believe that we have not complied with your data protection rights, you have the right to complain to your local regulator responsible for data protection and privacy matters.

How to contact us

In processing your personal data we act as a data controller. If you have any questions or want to exercise any of your legal rights, please contact us using the form on the website.

Document Control

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