

Privacy Policy

Updated 14th September 2018

1. Introduction

Welcome to Releasd. This policy explains how we handle and use your personal information in connection with our website and your rights in relation to it. Under data protection law, Releasd Limited is the controller of that information. Users of the subscription service we provide to our clients produce pages which may contain personal information. Those clients will be the controllers of any personal information that appears on those pages.

Releasd Limited (**we, our or us**) is committed to protecting and respecting your privacy.

This Privacy Policy explains why and how we will use the personal information that we have obtained from you or others in connection with your use of our websites, with whom we share it and the rights you have in connection with the information we use. Please read the following carefully.

This policy applies to our website located at www.releasd.com and related websites (together, the **Site**) and the services you can access through them.

Releasd Limited is the controller in relation to the processing activities described below. This means that Releasd Limited decides why and how your personal information is processed in connection with those activities. Please see the section at the end of this policy for our contact and legal information.

This policy does not apply to personal information that appears within the content of pages produced by users of clients that subscribe to our service. We process that information for our clients who are the controllers of that information, not us.

The Site is intended for use by individuals aged 18 and over. We do not knowingly collect personal information about children. If you are under the age of 18, please do not use the Site.

2. Information we collect about you

We receive personal information about you that you give to us (i.e. contact details and correspondence), that we collect from your use of the Site (i.e. device and Site activity data) and that we obtain from other sources (i.e. account setup details). We only collect personal information that we need and that is relevant for the purposes for which we intend to use it.

Personal Information you give us

This is information about you that you give to us by entering information via the Site or our social media pages or by corresponding with us by phone, email or other means and is provided by you entirely voluntarily. The information you give to us can include your name, contact details (such as phone number, email address and postal address), job title, employer's name, enquiry details, your opinion of our products and services and certain marketing preferences.



If you do not provide this information to us we may not be able to contact you and/or resolve your queries effectively.

Information we collect about you from your use of the Site

Each time you use the Site we automatically collect the following information:

- the following technical information: a unique identification code for our authentication system, the internet protocol (IP) address of your device and details regarding the type of browser software you use to access the Site;
- details of your use of the Site, namely traffic data, weblogs and other communication data, including where and when you clicked on certain parts of the Site and details of the webpage from which you visited it; and
- cookie, pixel and beacon identification information (for more information about these, please see our [Cookie Policy](#)).

We record telephone conversations when you call us for training and monitoring purposes.

If you do not provide this information, you may be unable to access some or all of the Site or its features.

Information we collect about you from other sources

We obtain certain personal information about you from sources outside of our business, as follows:

- If an organisation for whom you work subscribes with us, we will receive your name, job title, work location/address, email address and telephone number from them. We require this information to set up your account, which is a requirement of our contract with our client whose subscription you use. If you do not provide this information, we will be unable to provide you with access to our subscription service.
- We may obtain certain information about you that is available publically. We obtain this either directly from websites published online (e.g. [LinkedIn](#) and other social media sites or your organisation's website) or from third party data brokers (e.g. [Cognism](#)) who have themselves obtained your personal information from publically available sources. The categories of personal information we collect from these sources including your name, company, job title, industry, location, email address, email verification status, work/personal phone number, work/personal business URL and professional/business information relating to your work role. We use this information to ascertain whether our products and services will be of interest to you or your organisation, to contact you with marketing information, to discuss business opportunities and to improve our understanding of our market, the industry we operate in and the behaviours of decision-makers within it, but in each case, only to the extent permitted by data protection law. Where applicable, we may combine this personal information with details of your past interactions with us or our Site and create a score to measure your likely level of interest in our products and services.

3. Use of your personal information

We use your personal information for a variety of reasons. We rely on different legal grounds to process your personal information, depending on the purposes of our use and the risks to your privacy. You will always have the option not to receive marketing communications from us and can opt-out at any time. We do not share your personal information with companies that would send their marketing to you.

We use your personal information in the following ways:

3.1 Where you have provided CONSENT

We may use and process your personal information where you have **consented** for us to do so for the following purposes to supply marketing or other material you have specifically requested from us.

You may withdraw your consent for us to use your information in any of these ways at any time. Please see [Your rights over your personal information](#) for further details.

3.2 Where required to comply with our LEGAL OBLIGATIONS

We will use your personal information to comply with our legal obligation to keep a record relating to the rights you exercise in connection with our processing of your personal information.

3.3 Where processing is necessary for us to pursue a LEGITIMATE INTEREST

We may use and process your personal information where it is necessary for us to pursue our **legitimate interests** as a business for the following purposes:

Processing necessary for us to promote our business, brands and products

- if you are a corporate subscriber, to contact you by email or by telephone with marketing information about our products and services (other than where we have asked you for your consent). We will use your personal information to tailor or personalise the marketing communications you receive to make them relevant to you and also to send targeted marketing messages via social media and other third party platforms, which may involve sharing your personal information with those platforms. Please see further the [Marketing](#) section below; and
- to create a profile of you and analyse this to obtain insight about market or industry trends, client behaviours which inform our marketing strategy, and to enhance and personalise your experience as a visitor (as well as the marketing information we contact you with in the ways described in the paragraph above).

Processing necessary for us to support customers and users with sales and other enquiries

- to correspond and communicate with you in connection with the services we offer;
- to train and monitor our staff and to identify ways of improving your customer service experience;

Processing necessary for us to respond to changing market conditions and our customers' needs

- for market research, insight and intelligence in order to improve our understanding of our market and industry and, as a result, the products and services that we deliver to you.

Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively

- to administer the Site and our social media pages and for internal operations, including troubleshooting, testing and statistical reporting purposes;
- for the prevention of fraud and other criminal activities;
- to verify the accuracy of information we hold about you and create a better understanding of you as an account holder or visitor;
- for network and information security purposes in order for us to take steps to protect your information against loss or damage, theft or unauthorised access;
- to comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request);
- for the purposes of a corporate restructure or reorganisation or sale of our business or assets;
- for efficiency, accuracy or other improvements of our databases and systems e.g. by combining systems or consolidating records we hold about you;
- to enforce or protect our contractual or other legal rights or to bring or defend legal proceedings; and
- for general administration including managing your queries, complaints, or claims, to send service messages and to provide you with important information about our business.

Marketing: As described above, if we specifically request your permission to send (or you specifically ask us to send) to you news and marketing material by email, we rely on your consent to do so. Otherwise we process your personal information for direct marketing purposes on the basis that it is necessary for us to pursue our legitimate interests as a business (see above in this section for further details). We try to tailor and personalise any marketing communications that we send to you, for example, by notifying you of products, services, offers or promotions that apply to your interests, location, industry sector, employer or job role. If you do not wish to receive marketing communications from us, you can opt-out at any time by using the unsubscribe link inside the email (to unsubscribe from marketing emails) or by sending an email to privacy@releasd.com (to unsubscribe from marketing emails or calls). Our webforms are intended for use by corporate users only. Whilst we try our best to prevent non-corporate users from submitting their details via these webforms (e.g. by using filters), the technology we use is not faultless. If you are not a corporate subscriber, please do not use our webforms to make requests and instead contact us directly using the contact information at the end of this policy.

4. Disclosure of your personal information by us

We only disclose your personal information outside our business in limited circumstances. If we do, we will put in place a contract that requires recipients to protect your personal information, unless we are legally required to share that information. Any suppliers or other recipients that work for us will be obliged to follow our instructions.

We may disclose your information to our third party service providers, agents, subcontractors and other suppliers for the purposes of providing services to us or directly to you on our behalf, including the operation and maintenance of the Site. Please see the table below in this section for further details regarding the personal information we disclose and our reasons for doing so.

When we use suppliers, we only disclose to them any personal information that is necessary for them to provide their services and only where we have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions.



We disclose your personal information to the following third parties for the purposes listed below:

Category of personal information	Recipient/industry (& subsector)	Purpose of disclosure
All personal information collected	IT service providers (support & cloud services), including hosting services provided by Amazon Web Services UK Limited	To support, maintain and host the Site, including the software and hardware infrastructure required for it to operate/be accessible online and to keep a backup of your personal information. We also use online IT service providers to provide contract execution services
Website traffic data, IP address and browser details.	Google, Inc. and its group companies (cloud – analytics services)	To assist with statistics and provide us with basic analytical tools for search engine optimisation and marketing purposes in order to improve our services
All personal information collected (not including Site traffic data or IP address).	Salesforce.com Inc and its group companies (cloud – CRM services), Google, Inc. and its group companies (cloud - Professional email, online storage, shared calendars and more)	To assist with our customer relationship management and to store details of our communications and interactions with you
All personal information collected (not including Site traffic data).	Act-On Inc and its group companies and Campaign Monitor and its group companies (cloud – email/campaign management)	To manage outbound email marketing communications we send to you and their associated campaigns. Some of the webpages you access on the Site are provided by Salesforce.com Inc and hosted on the servers that operate their website
All personal information collected	Our legal, accountancy and other professional advisers (consultancy – professional services)	To provide us with advice in relation to our business, including our legal, financial and other obligations and claims

The recipients listed in the table above are located in the European Economic Area and the USA.

We may disclose your personal information to other third parties as follows:

- any third party who is restructuring, selling, buying or acquiring some or all of our business or assets (or contemplating doing so) or in the event of a merger, bankruptcy, dissolution, reorganisation or similar event to with any parties involved in those processes or transactions; and
- if we are under a duty to disclose or share your information in order to comply with any legal or regulatory obligation or police, court or government request.

5. Transfers of your personal information outside of the European Economic Area

We may transfer your personal information outside of the European Economic Area (EEA). We take measures to protect your personal information when it is transferred to a country which does not have similar data protection laws to the UK.

All the personal information collected about you by us or on our behalf may be transferred to countries outside the EEA. By way of example, this may happen if any of our servers or those of our third party service providers are from time to time located in a country outside of the EEA. These countries may not have similar data protection laws to the UK and so they may not protect the use of your personal information to the same extent. See [Disclosure of your personal information by us](#) for details of the non-EEA countries to which we may transfer your personal information.

If we transfer your information outside of the EEA in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this policy. These steps include imposing contractual obligations on the recipients of your personal information or ensuring that the recipients are subscribed to 'international frameworks' that aim to ensure adequate protection. For example, those of our third party service providers who receive your personal information in the USA may subscribe to the "Privacy Shield" framework. Where they do not, we ensure that we impose contractual obligations on them that are broadly equivalent as required by UK data protection law. Please contact us using the details at the end of this policy for more information about the protections that we put in place and to obtain a copy of the relevant documents.

If you use our Site or services whilst you are outside the EEA, your information may be transferred outside the EEA in order to provide you with those services.

6. Security and links to other websites

We take the security of your personal information seriously and use a variety of measures based on good industry practice to keep it secure. Nonetheless, transmissions over the internet and to the Site may not be completely secure, so please exercise caution. When accessing links to other websites, their privacy policies, not ours, will apply to your personal information.

We employ security measures to protect the information you provide to us, to prevent access by unauthorised persons and unlawful processing, accidental loss, destruction and damage. When we have provided (or you have chosen) a password allowing you access to certain benefits of the Site, you are responsible for safeguarding it and keeping it confidential and you promise not to allow it to be used by third parties. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do everything possible to protect your personal information, we cannot guarantee the security of any personal information you disclose online. You accept the inherent security implications of using the internet and will not hold us responsible for any breach of security unless we are at fault.

The Site may contain links to other websites run by other organisations which we do not control. This policy does not apply to those other websites, so we encourage you to read their privacy policies. We are not responsible for the privacy policies and practices of other websites (even if you access them using links that we provide) and we provide links to those websites solely for your information and convenience. We specifically disclaim responsibility for their content, privacy practices and terms of use, and we make no endorsements, representations or promises about their accuracy, content or thoroughness. Your disclosure of personal information to third party websites is at your own risk.

In addition, if you linked to the Site from a third party website, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party website and recommend that you check the policy of that third party website.

7. The periods for which we retain your personal information

We will not hold your personal information in an identifiable format for any longer than is necessary for the purposes for which we collected it. The periods for which we hold your personal information will depend on the type of personal information and whether you are a user of the subscription services we provide to a subscribing client or of a prospective/trialling client, or a visitor to the Site. These periods also apply where we share your information with suppliers who process your personal information on our behalf.

We (and the suppliers we instruct) retain your personal information for the following periods:

If you are a **user of the subscription services** we provide to our client:

Type of personal information	How long we keep your personal information after we receive it
Account setup information and preferences	7 years after the expiry date of your organisation's last subscription
Device and Site activity information	7 years after the date of the Site activity
Correspondence and call recordings	7 years after the date of the correspondence however, we may selectively delete/destroy correspondence sooner on a case by case basis if we identify there is no longer a business purpose for keeping it.

If you work for a **client, prospective client**, are **participating in trial access** to our services or are **just visiting** the Site:

Type of personal information	How long we keep your personal information after we receive it
Contact details, business information and preferences (other than in correspondence)	Indefinitely – we retain these details to track trends and movements within our industry at an individual and overall market level
Device and Site activity information	Indefinitely – we retain these details to identify our contacts' previous interest in our products and services
Correspondence and call recordings	2 years after the date you last contact us

In relation to any period mentioned above, we will retain your personal information from the expiry of that period until the start date of our next financial year (31st January each year) to allow us to manage the deletion/destruction process efficiently.

The only exceptions to the periods mentioned above are where:

- you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law (see further [Your rights over your personal information](#));

- you exercise your right to require us to retain your personal information for a period longer than our stated retention period (see further [Your rights over your personal information](#));
- we bring or defend a legal claim or other proceedings during the period we retain your personal information, in which case we will retain your personal information until those proceedings have concluded and no further appeals are possible;
- the terms of our contract with our client under which you access our subscription services require that we delete, destroy or return your personal information sooner; or
- in limited cases, existing or future law or a court or regulator requires us to keep your personal information for a longer or shorter period.

We retain an anonymised version of the submitted personal information for as long as we require it for reporting and other statistical and analytical purposes. Such anonymised information will not identify you and may be derived from personal information that was contained within accounts that have subsequently been deleted.

8. Your rights over your personal information

You have a number of rights in relation to your personal information under data protection law. In relation to certain rights, we may ask you for information to verify your identity and, where applicable, to help us to search for your personal information. Except in rare cases, we will respond to you within one month after we have received this information or, where no such information is required, after we have received full details of your request.

You have the following rights, some of which may only apply in certain circumstances:

- to **be informed** about the processing of your personal information (this is what this statement sets out to do);
- to have your personal information **corrected if it is inaccurate** and to have **incomplete personal information completed**;

The accuracy of your information is important to us and we are working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change your name or address/email address, or you discover that any of the other information we hold is inaccurate or out of date, please let us know by contacting us in any of the details described at the end of this policy.

- to **object to processing** of your personal information;

Where we rely on our legitimate interests as the legal basis for processing your personal information for particular purposes, you may object to us using your personal information for these purposes by emailing or writing to us at the address at the end of this policy. Except for the purposes for which we are sure we can continue to process your personal information, we will temporarily stop processing your personal information in line with your objection until we have investigated the matter. If we agree that your objection is justified in accordance with your rights under data protection laws, we will permanently stop using your data for those purposes. Otherwise we will provide you with our justification as to why we need to continue using your data.



You may object to us using your personal information for direct marketing purposes and we will automatically comply with your request. If you would like to do so, please use our unsubscribe tool.

- to **withdraw your consent** to processing your personal information;

Where we rely on your consent as the legal basis for processing your personal information, you may withdraw your consent at any time by contacting us using the details at the end of this policy. If you would like to withdraw your consent to receiving any direct marketing to which you previously opted-in, you can also do so using our unsubscribe tool. If you withdraw your consent, our use of your personal information before you withdraw is still lawful.

- to **restrict processing** of your personal information;

You may ask us to restrict the processing your personal information in the following situations:

where you believe it is unlawful for us to do so, you have objected to its use and our investigation is pending or you require us to keep it in connection with legal proceedings.

In these situations, we may only process your personal information whilst its processing is restricted if we have your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.

- to have your personal information **erased**;

In certain circumstances, you may ask for your personal information to be removed from our systems by emailing or writing to us at the address at the end of this policy. Unless there is a reason that the law allows us to use your personal information for longer, we will make reasonable efforts to comply with your request.

- to **request access** to your personal information and information about how we process it;

You have the right to ask for a copy of the information that we hold about you by emailing or writing to us at the address at the end of this policy. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.

- to **electronically move, copy or transfer** your personal information in a standard form (*data portability*); and

Where we rely on your consent as the legal basis for processing your personal information or need to process it in connection with a contract in place directly with you, you may ask us to provide you with a copy of that information in a structured data file. We will provide this to you electronically in a structured, commonly used and machine readable form, such as a CSV file.

You can ask us to send your personal information directly to another service provider, and we will do so if this is technically possible. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.

- rights relating to **automated decision making**, including profiling.



We do not envisage that any decisions will be taken about you using purely automated means, however we will update this policy if this position changes.

To exercise these rights, please contact us using the details at the end of this policy.

You have the right to lodge a complaint with a data protection regulator in Europe, in particular in a country you work or live or where your legal rights have been infringed. The contact details for the Information Commissioner's Office (**ICO**), the data protection regulator in the UK, are available on the [ICO website](#), where your personal information has or is being used in a way that you believe does not comply with data, however, we encourage you to contact us before making any complaint and we will seek to resolve any issues or concerns you may have.

9. Changes to our Privacy Policy

Please check this page regularly for changes to this policy. We will notify you of changes via your account and/or by email (if we hold a valid email address for you).

We may review this policy from time to time and any changes will be notified to you by posting an updated version on this Site and/or by contacting you by email or via your account. Any changes will take effect 7 days after we post the modified terms on our website or after the date we notify by email or via your account. We recommend you regularly check for changes and review this policy when you visit this Site. If you do not agree with any aspect of the updated policy, you must promptly notify us and cease using this Site.

10. Contact and legal information

You can contact us with your queries in relation to this policy or for any other reason at any time.

To contact us for any reason, including to exercise any of your rights in relation to your personal information, please write to the Data Protection Manager at the address below or email us at privacy@releasd.com.

Releasd Limited is a company incorporated in England under company registration number is 06671075 and registered office address at 5 Jardine House, Harrovian Business Village, Bessborough Road, Harrow, Middlesex, HA1 3EX. You can write to us at our office address at: Labs, 407 Chalk Farm Road, London, NW1 8AH.