

## **SYZYGY Internet Privacy Policy**

**May 2018**

This website is operated by SYZYGY UK LTD ("we" or "us").

We respect the privacy of users of our website(s) and recognise that when you choose to provide us with information about yourself, you trust us to act in a responsible manner with that information. This privacy policy contains important information about how we use your personal information. **If you just want to know about how we use cookies please refer below.**

### **What information do we collect?**

At times we may request that you voluntarily supply us with personal information. Generally we request this when you want us to provide you with information in return.

We may gather the following information about you when you use our website(s):

- Name
- Email address
- Telephone number
- IP address (a unique identifier for your computer or other device)
- Mobile device ID
- Information provided by you in relation to submitting a job application to us (this may include personal information on your CV)

### **How do we use it?**

We will use your personal information in the following ways. 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 also set out below:

<b>How we will use your personal information</b>	<b>Our legal basis for processing</b>
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to provide you with information that you have requested e.g. a newsletter, bulletins;	Consent – we only use your personal information for this purpose if you have asked us to do so. You can withdraw your consent at any time.
to respond to specific queries you may raise regarding SYZYGY Group, WPP and its operating companies;	Consent – we only use your personal information for this purpose if you have asked us to do so. You can withdraw your consent at any time.
to provide you with better ways of accessing information from our website(s);	Our legitimate interests – we use your personal information to help us to deliver the best online experience to you and other website users.
to process and consider your job application;	Our legitimate interests – we use your personal information to assess your job application, and to keep you updated throughout the application process.

For how we use your information that is collected using cookies and similar technologies please see the "Cookies" page [here](#).

### **Do we pass your information to third parties?**

We may send your personal information to other group companies, affiliates and third parties to help us process your personal information for the purposes set out in this policy. Further details of our group companies can be found [here](#).

We may disclose your personal information if we or any of our assets are the subject of a sale or similar corporate transaction. We will ensure that the third parties who receive your personal information are required to keep it confidential.

We may disclose personal information to third parties when we reasonably believe we are required by law, and in order to investigate, prevent, or take action regarding suspected or actual unlawful or otherwise prohibited activities, including, but not limited to, fraud.

### **How do we use your information for marketing?**

We will only provide information to you that you have asked for via the website.

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## **Where do we send your information?**

We are a global company and therefore we may transfer your personal information to countries around the world including the US and other countries outside Europe. We will, where the country to which your data is transferred has not been found to provide an adequate level of protection, put in place appropriate safeguards (we use standard contractual clauses) to ensure your information is protected.

## **How long do we keep your information?**

We will keep your information for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation). Data may be held for longer periods where required by law or regulation and to establish, exercise or defend our legal rights.

In addition, personal data may be securely archived with restricted access and other appropriate safeguards where there is a need to continue to retain it.

## **Cookies**

### **What are cookies?**

We may use information obtained from cookies or similar technology. Cookies are text files containing small amounts of information which we download onto your computer or device when you visit our website. Therefore, when we refer to "you" in this section we mean your computer. We can recognise these cookies on subsequent visits and they allow us to remember you.

Cookies come in many forms. We have set out below the main types and categories of cookies that are used. This section refers to all types and categories of cookies and not just those we use on our website.

First and third-party cookies - whether a cookie is first-party or third-party refers to the domain placing the cookie. First-party cookies are those set by a website that is being visited by the user, the website displayed in the URL window e.g. [www.SYZYGY.co.uk](http://www.SYZYGY.co.uk). Third-Party cookies are cookies that are set by a domain other than that of the website being visited by the user. If a user visits a website and another entity sets a cookie through that website this would be a third-party cookie.

Persistent cookies – these cookies remain on a user's device for the period of time specified in the cookie. They are activated each time that the user visits the website that created that particular cookie.

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Session cookie – these cookies allow website operators to link the actions of a user during a browser session. A browser session starts when a user opens the browser window and finishes when they close the browser window. Session cookies are created temporarily. Once you close the browser, all session cookies are deleted.

### **What do we use cookies for?**

Cookies fall into one or more of the categories set out below. This website uses cookies that fall into all the categories. Also we use data from targeting cookies placed on your computer by third parties when you have visited other websites.

#### **1. Strictly necessary cookies – These cookies enable services you have specifically asked for.**

These cookies are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website. Without these cookies certain services you have asked for cannot be provided. e.g. the ASP.NET cookie.

#### **2. Performance cookies – These cookies collect information on the pages visited.**

These cookies collect information about how users use a website, for instance which pages users go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. They are only used to improve how the website works.

#### **3. Functionality cookies – These cookies remember choices you make to improve your experience.**

These cookies allow the website to remember choices you make and provide enhanced, more personal features. This may also be used to help provide services you have asked for such as watching a video or commenting on a blog. The information these cookies collect may be anonymised and they cannot track your browsing activity to other websites

#### **4. Targeting cookies or advertising cookies – these cookies collect information about your browsing habits in order to make advertising relevant to you and your interests.**

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These cookies are used to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by advertising networks with the website operator's permission. They remember that you have visited a website and this information is shared with other organisation such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.

If you want to delete any cookies that may already be on your computer or device, please refer to the instructions for your file management software to locate the file or directory that stores cookies. If you want to stop cookies being stored on your computer in future, please refer to your browser manufacturer's instructions by clicking "Help" in your browser menu. Further information on cookies is available at [www.allaboutcookies.org](http://www.allaboutcookies.org). By deleting our cookies or disabling future cookies you may not be able to access certain areas or features of our website.

### **Third Party Websites**

Our website links to third party sites which we do not operate or endorse. These websites may use cookies and collect your personal information in accordance with their own privacy policies. This privacy policy does not apply to third party websites and we are not responsible for third party websites.

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## **How do we protect your information?**

We take appropriate measures to ensure that your personal information disclosed to us is kept secure, accurate and up to date and kept only for so long as is necessary for the purposes for which it is used.

## **Under 13 year olds**

This web site is not intended or designed to attract children under the age of 13. We do not knowingly collect personal information from or about any person under the age of 13. If you are under 13 years old and wish to ask a question or use this site in any way which requires you to submit your personal information, please get your parent or guardian to do so on your behalf.

## **Your rights**

You are entitled to ask:

1. for a copy of the personal information we hold about you, and details about how we are processing your personal information;
2. to have any inaccuracies in your personal information corrected;
3. if we are processing your personal information by automated means and on the basis of your consent (see "How do we use it?", above), for us to provide your personal information to you in a structured, commonly-used and machine-readable format. You can also ask us to provide your personal information directly to a third party in this format, and, if technically feasible, we will do so; and
4. 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).

Please contact us using the details set out below if you would like to exercise any of these rights.

You also have the right to make a complaint to the supervisory authority if you're not happy with how we've handled your personal information. In the UK, the supervisory authority is the Information Commissioner's Office (<http://www.ico.org.uk>).

## **How to contact us**

If you wish to exercise any of your rights in relation to your personal information or if you have any queries about how we use your personal information, please let us know by contacting us at the following address: [GDPR@SYZYG.Y.co.uk](mailto:GDPR@SYZYG.Y.co.uk)

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### **Changes to this privacy policy**

We review this privacy policy on a regular basis to ensure that it is up-to-date with our use of your personal information, and compliant with applicable data protection laws.

We reserve the right, at our discretion, to revise this privacy policy at any time. The updated privacy policy will be posted on our website. You are encouraged to review this privacy policy from time to time.

### **Data Protection Officer**

If you have any questions about this Privacy Policy, please contact our Data Protection Officer at [DPO@SYZYG.Y.co.uk](mailto:DPO@SYZYG.Y.co.uk)