

Data Privacy Notice

Customers and Enquirers

1. Introduction

Pythagoras is “data controller”, this means we are responsible for deciding how we hold and use personal information about you. This privacy notice is to make you aware of how and why your personal data will be used and how long it will be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation (EU 2016/679 GDPR).

2. Data Protection Principles

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way which is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as is necessary for the purposes we have told you about.
- Kept securely.

The General Data Protection Regulations (GDPR) will apply in the UK from 25 May 2018 and will replace the Data Protection Act 1998. Pythagoras aims to remain fully compliant with the Data Protection Act until it is replaced, and will be ready for the GDPR changes in May 2018.

Pythagoras recognises that under the Act it may have responsibilities as a Data Processor for some client services and the specific obligations that apply in these circumstances.

Pythagoras will:

- Clearly communicate policies and procedures to staff.
- Deliver training and run regular general awareness campaigns to educate staff on their data protection and security responsibilities.
- Designate responsibility for data protection compliance to a suitable individual within the UK.
- Review and maintain appropriate records of processing activities and manage any identified risks.
- Implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk involved with the data processing.
- Ensure processes are in place to respond to the data controllers request; for information (in relation to subject access requests); to correct inaccurate records; restrict the processing of

an individual's personal data, the provision of data in a structured, commonly used and machine readable form.

- Seek written authorisation from the data controller before engaging the services of a sub-processor.
- Ensure client agreements contain standard contract clauses covering data erasure, retention and disposal.
- Pythagoras will review Information Commissioner Office guidance to ensure ongoing compliance with the General Data Protection Regulations.

3. What information do we hold about you?

Depending on the relevant circumstances, we may collect some or all of the information listed below to enable us to share marketing communications such as news or upcoming events, or deliver a service as part of a contract with Pythagoras.

- Name;
- Business telephone number(s)
- Business email(s)
- Job title(s)
- Company name
- Company address(s)
- IP address;

Please note that the above list of categories of personal data we may collect is not exhaustive.

4. How do we collect your personal data?

We collect personal data from enquirers and customers in three primary ways:

- Personal data that you, the customer or enquirer, give to us;
- Personal data that we receive from other sources; and
- Personal data that we collect automatically.

4.1. Personal data you give to us

Pythagoras needs to know certain information about you in order to communicate marketing messaging to you or to deliver a service as part of a contract with Pythagoras.

There are numerous ways you can share your information with us. It all depends on what suits you. These may include:

- Entering your details on the Pythagoras or Evolve LRG website via a web form;
- Giving your details or a business card to Pythagoras employee;
- Emailing or phoning Pythagoras;

4.2. Personal data we receive from other sources

We may, on occasion receive personal data from other sources, for example:

- If you attend an event at which Pythagoras are exhibiting, where you have agreed for the event organisers to share delegate lists with exhibitors;
- If you register for an event that Pythagoras is hosting via one of our partner organisations;
- If you 'like' our page on Facebook, LinkedIn or Instagram or 'follow' us on Twitter we will receive your personal information from those sites;
- Data provided to us from your colleagues;
- If you are referred to us via one of our partner organisations.

4.3. Personal data we collect automatically

- Analytics on interaction with our website via Google Analytics, as detailed at <https://policies.google.com/privacy/partners>
- Analytics on interaction with our marketing messaging via ClickDimensions. This will show whether you have received, opened, or clicked on any links in any given email sent to you from us via ClickDimensions.

5. How do we use your personal data?

We generally use enquirer or customer data in three ways:

- Marketing activities;
- Delivering services as part of a contract with Pythagoras; and
- To help us to establish, exercise or defend legal claims.

Here are some more details about each:

5.1. Marketing Activities

We've listed below various ways in which we may use and process your personal data for this purpose, where appropriate. Please note that this list is not exhaustive.

- Storing and maintaining your details on our internal database in order to communicate with you about upcoming events or news.
- Storing and maintaining your details on our internal database in order to follow up from enquiries or specific interactions with our website(s).
- Storing analytical data based on your interaction with our website(s) and emails.
- Retaining details about documents you may have downloaded or Pythagoras events you may have registered for.

5.2. Delivering services as part of a contract with Pythagoras

- Carrying out our obligations arising from any contracts entered into between us;
- Facilitating internal discussions about future service requirements;

- Facilitating our sales order and invoicing processes;

We may use your personal data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not happy about this, in certain circumstances you have the right to object.

5.3. To help us to establish, exercise or defend legal claims

In more unusual circumstances, we may use your personal data to help us to establish, exercise or defend legal claims.

6. Who do we share your personal data with?

Where appropriate and in accordance with local laws and requirements, we may share your personal data, in various ways and for various reasons, with the following categories of people:

- When you register for a Pythagoras event, we may share your details with the event organiser or venue for event planning purposes;
- If you register for an event with Pythagoras is holding in partnership with another organisation, we may share some basic contact information with the partner for event planning purposes;
- Basic contact information may be shared with vendors/third parties for the purposes of issue escalation and resolution;
- If Pythagoras merges with or is acquired by another business or company in the future, (or is in meaningful discussions about such a possibility) we may share your personal data with the (prospective) new owners of the business or company;
- We may share your contact details with other customers for reference purposes, only in the event that you have given us consent to do so;
- Third party storage providers where we have an appropriate processing agreement (or similar protections) in place.

7. How do we safeguard your personal data?

We are committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures. These include measures to deal with any suspected data breach.

If you suspect any misuse or loss of or unauthorised access to your personal information please let us know immediately.

8. How long do we keep your personal data for?

Any contacts that have not been modified or updated (eg tracked correspondence with an individual or, where appropriate, the organisation the individual is working for) for 2 years will be deleted from our systems (or for such longer period as we believe in good faith that the law or relevant regulators require us to preserve your data). After this period, it is likely your data will no longer be relevant for the purposes for which it was collected.

Customer records are maintained for the duration of agreed service delivery, and will be retained for seven years from the date of their last transaction with Pythagoras.

9. How can you access, amend or take back the personal data that you have given to us?

One of the GDPR's main objectives is to protect and clarify the rights of EU citizens and individuals in the EU with regards to data privacy. This means that you retain various rights in respect of your data, even once you have given it to us. These are described in more detail below.

To get in touch about these rights, please contact us. We will seek to deal with your request without undue delay, and in any event within one month (subject to any extensions to which we are lawfully entitled). Please note that we may keep a record of your communications to help us resolve any issues which you raise.

Right to object: this right enables you to object to us processing your personal data where we do so for one of the following four reasons: (i) our legitimate interests; (ii) to enable us to perform a task in the public interest or exercise official authority; (iii) to send you direct marketing materials; and (iv) for scientific, historical, research, or statistical purposes.

The "legitimate interests" and "direct marketing" categories above are the ones most likely to apply to our enquirers or customers of Pythagoras. If your objection relates to us processing your personal data because we deem it necessary for your legitimate interests, we must act on your objection by ceasing the activity in question unless:

- we can show that we have compelling legitimate grounds for processing which overrides your interests; or
- we are processing your data for the establishment, exercise or defence of a legal claim.

If your objection relates to direct marketing, we must act on your objection by ceasing this activity.

Right to withdraw consent: Where we have obtained your consent to process your personal data for certain activities, you may withdraw this consent at any time and we will cease to carry out the particular activity that you previously consented to unless we consider that there is an alternative reason to justify our continued processing of your data for this purpose in which case we will inform you of this condition.

Data Subject Access Requests (DSAR): You may ask us to confirm what information we hold about you at any time, and request us to modify, update or Delete such information. We may ask you to verify your identity and for more information about your request. If we provide you with access to the information we hold about you, we will not charge you for this unless your request is "manifestly unfounded or excessive". If you request further copies of this information from us, we may charge you a reasonable administrative cost where legally permissible. Where we are legally permitted to

do so, we may refuse your request. If we refuse your request we will always tell you the reasons for doing so.

Right to erasure: You have the right to request that we erase your personal data in certain circumstances. Normally, the information must meet one of the following criteria:

- the data are no longer necessary for the purpose for which we originally collected and/or processed them;
- where previously given, you have withdrawn your consent to us processing your data, and there is no other valid reason for us to continue processing;
- the data has been processed unlawfully (i.e. in a manner which does not comply with the GDPR);
- it is necessary for the data to be erased in order for us to comply with our legal obligations as a data controller; or
- if we process the data because we believe it necessary to do so for our legitimate interests, you object to the processing and we are unable to demonstrate overriding legitimate grounds for our continued processing.

We would only be entitled to refuse to comply with your request for one of the following reasons:

- to exercise the right of freedom of expression and information;
- to comply with legal obligations or for the performance of a public interest task or exercise of official authority;
- for public health reasons in the public interest;
- for archival, research or statistical purposes; or
- to exercise or defend a legal claim.

When complying with a valid request for the erasure of data we will take all reasonably practicable steps to delete the relevant data.

Right to restrict processing: You have the right to request that we restrict our processing of your personal data in certain circumstances. This means that we can only continue to store your data and will not be able to carry out any further processing activities with it until either: (i) one of the circumstances listed below is resolved; (ii) you consent; or (iii) further processing is necessary for either the establishment, exercise or defence of legal claims, the protection of the rights of another individual, or reasons of important EU or Member State public interest.

The circumstances in which you are entitled to request that we restrict the processing of your personal data are:

- where you dispute the accuracy of the personal data that we are processing about you. In this case, our processing of your personal data will be restricted for the period during which the accuracy of the data is verified;

- where you object to our processing of your personal data for our legitimate interests. Here, you can request that the data be restricted while we verify our grounds for processing your personal data;
- where our processing of your data is unlawful, but you would prefer us to restrict our processing of it rather than erasing it; and
- where we have no further need to process your personal data but you require the data to establish, exercise, or defend legal claims.

If we have shared your personal data with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will, of course, notify you before lifting any restriction on processing your personal data.

Right to rectification: You also have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you. If we have shared this personal data with third parties, we will notify them about the rectification unless this is impossible or involves disproportionate effort. Where appropriate, we will also tell you which third parties we have disclosed the inaccurate or incomplete personal data to. Where we think that it is reasonable for us not to comply with your request, we will explain our reasons for this decision.

Right of data portability: If you wish, you have the right to transfer your personal data between data controllers. To allow you to do so, we will provide you with your data in a commonly used machine-readable format that is password-protected so that you can transfer the data to another online platform. Alternatively, we may directly transfer the data for you. This right of data portability applies to: (i) personal data that we process automatically (i.e. without any human intervention); (ii) personal data provided by you; and (iii) personal data that we process based on your consent or in order to fulfil a contract.

Right to lodge a complaint with a supervisory authority: You also have the right to lodge a complaint with your local supervisory authority.

If you would like to exercise any of these rights, or withdraw your consent to the processing of your personal data (where consent is our legal basis for processing your personal data) you should contact us. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

You may ask to unsubscribe from marketing activities at any time.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the period for which we hold your data.

10. Who is responsible for processing your personal data on the Pythagoras website?

Personal data which is captured via our website regarding enquiries, downloads or registrations is processed by our marketing and business development teams.

11. Our legal bases for processing your data

Article 6(1)(f) of the GDPR says that we can process your data where it "is necessary for the purposes of the legitimate interests pursued by [us] or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of [you] which require protection of personal data."

We think it's reasonable to expect that if you have interacted with us via our website, by phone, via email, or at an event at which you have provided us with your data, you are happy for us to collect and otherwise use your personal data to respond to your specific questions, discuss content or make event arrangements with you (unless explicitly stated otherwise at point of collection).

We also think it's reasonable to expect that if you or your organisation has entered into a contract with Pythagoras for the delivery of a service, you are happy for us to contact you in relation to that service or any future services that may be of benefit to you.

We don't think these activities prejudice individuals in any way however, you do have the right to object to us processing your personal data on this basis.

12. Contacts

To exercise your rights under GDPR or to request further information please contact Pythagoras Data Protection Officer:

Lara Bell

Director of People and Culture

Ashwood House, Grove Business Park, Waltham Road, Maidenhead, SL6 3LW

If you wish to lodge a complaint the relevant supervisory authority is:

The Information Commissioner's Office

<https://ico.org.uk/concerns/>