

ENCOMPASS PRIVACY POLICY

Last updated: 05/25/2018

Encompass takes your privacy seriously where we deal with your personal information. This means information that identifies you personally such as your name, contact details, job role and photo, or data that can be linked with such information in order to identify you directly or indirectly (“information”).

This Privacy Policy (the “Policy”) sets out the basis on which any of your information will be collected, stored and used by us and reflects our commitment to maintain the confidentiality of your information and to provide you with the best possible experience.

References to “**Encompass**”, ‘**we**’, ‘**our**’ or ‘**us**’ in this Policy are to Encompass Digital Media. Inc.

You have the right to object to us using, sharing or carrying out any activity with your personal information (in certain circumstances) including using your personal information for direct marketing (i.e. receiving emails from us notifying you about other products which we think will be of interest to you or being contacted with varying potential opportunities). Contact us at any time with the details provided in the contact section below for more details and to exercise this right where applicable.

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WHAT INFORMATION DOES ENCOMPASS COLLECT?

We collect and process your information in the following ways:

Information you give us directly

- You give us information about you when you contact us or otherwise interact with us, including via e-mail, letter or phone.
- You give us information about you when you register to download any of our case studies, checklists or other content from our website. Information including your name, email address, telephone number, job title and company name.
- You give us information about you when you like, post or otherwise interact with our social media pages such as Facebook, Twitter and LinkedIn. This is generally contents of your public profile and any messages or comments posted or sent to us by you.
- You give us information about you where you interact with us as a representative of one of our clients, business partners or suppliers. Information including, your name, email, job title and company name.
- You give us information about you when you register and apply for vacancies on the careers section of our website. Please see our Candidate Privacy Notice [here](#) to find out more.

Information we collect from other parties

- We may collect information about you from our other group companies for internal reasons, primarily for business and operational purposes. This will generally be professional information including, your name, email, job title and company name. We only use this information in line with the privacy policy and privacy commitments of the relevant group company we have collected your information from.
- We may collect information about you from the company you work for where you interact with us as a representative of one of our business partners or suppliers. This will generally be professional information including, your name, email, job title and company name.

Information we collect automatically

- When you interact with our services, our servers keep an activity log unique to you that collects certain administrative and traffic information including source IP address, time of access, date of access, web page(s) visited, language use, software crash reports and type of browser used. See our Cookie Notice [here](#) for more detail.

HOW DOES ENCOMPASS USE MY INFORMATION?

We may use your information for the following purposes:

Where we have a legitimate Interest

- To carry out our obligations arising from any agreements we enter into with you as a representative and to contact you in relation to such agreements.
- To provide you with the information, products and services that you request from us.

- To provide you with service messages, including messages requesting your feedback on our products and notifying you about changes to our website, services or changes to our terms, conditions and policies.
- To periodically provide you with promotional information about our services we feel may interest you. We will only contact you by email, and you are able to object to receiving such communications at any time.
- To provide support services to you.
- To investigate and address enquiries, questions and complaints and respond to any feedback.
- To develop and improve our website to enhance your experience.
- To improve the quality of the services we provide.
- To ensure effective operational management and internal administration of our business, document retention, compliance with regulatory guidance and exercise or defence of legal claims.
- To have our product services team contact you were you have indicated an interest in our products.

Where we have a legal obligation

- To protect, investigate and deter against fraudulent, unauthorised or illegal activity. Including undertaking necessary security and identifying verification checks.

Where we rely on legitimate interest as a ground for processing your information, we carry out a 'balancing test' to ensure that our processing is necessary and that your fundamental rights of privacy are not outweighed by our legitimate interests, before we go ahead with such processing. We keep a record of these balancing tests. You have a right to the information contained in these balancing tests on request, and can find out more by contacting us using the details below.

DOES ENCOMPASS SHARE MY INFORMATION?

We share your information in the following circumstances:

- We share your information with third parties who perform functions on our behalf and who also provide services to us, such as professional advisors, IT consultants carrying out testing and development work on our business technology systems, analytics and search engine providers that assist us in the improvement and optimisation of our websites, research and mailing houses and function co-ordinators. These third parties comply with similar and equally stringent undertakings of privacy and confidentiality.
- We share your information with trusted third-party suppliers of information verification services (including credit reference agencies) for the purposes of validating the information you provide to us in the course of interacting with us or entering into a contract with us.
- We share your information if we are under a duty to do so, in order to comply with (and/or where we believe we are under a duty to comply with) any legal obligation; or in order to enforce our terms of use and any other agreement; or to protect the rights, property, safety, or security of Encompass, third parties, visitors to our website or the public.
- We share your personal information with our [other group companies](#) for internal reasons, primarily for business and operational purposes, in line with this Policy. As we continue to develop our business, we may sell or purchase assets. If another entity acquires us or

merges with us your personal information will be disclosed to such entity. Also, if any bankruptcy or reorganisation proceeding is brought by or against us, all such information will be considered an asset of ours and as such it is possible they will be sold or transferred to third parties.

We do not sell, rent or exchange your information with any third party for commercial reasons.

HOW LONG DOES ENCOMPASS KEEP MY INFORMATION?

Information that we collect will be retained only for as long as is necessary to fulfil the purposes outlined above in this Policy (this will generally be for the duration of time where you utilise our services) or to comply with our legal obligations.

When determining the relevant retention periods for your information, we will take into account factors including:

- our contractual obligations and rights in relation to the information involved;
- legal obligation(s) under applicable law to retain data for a certain period of time;
- our legitimate interests where we have carried out balancing tests (see section on 'How does Encompass use my information above');
- statute of limitations under applicable law(s);
- (potential) disputes; and
- guidelines issued by relevant data protection authorities.

Otherwise, we securely erase your information once no longer needed. Contact us if you would like more details on how long we retain your information.

DOES ENCOMPASS TRANSFER MY INFORMATION ABROAD?

We share information that we collect with our group companies located in Singapore, Buenos Aires and U.S.A. This information is shared for internal reasons, primarily for business and operational purposes.

Where your personal information is transferred from within the EU to a region outside the European Economic Area (EEA), security measures and appropriate safeguards are put in place to protect your information and we ensure that all transfers of your information comply with applicable data protection law, and all processing is carried out in accordance with our instructions.

We have EU Model Clauses in place with any party your information is transferred to outside the EEA, as an adequate safeguard. To find out more about how we safeguard your information (including obtaining a copy of such safeguards) in relation to transfers outside the EEA, please contact us via the details provided in the contact section below.

WHAT ARE MY PRIVACY RIGHTS?

By law, you have a number of rights (subject to certain conditions) when it comes to your information. Further information and advice about your rights can be obtained from the data protection regulator in your country. You can exercise any of these rights by contacting us through our contact information below.

- **The right to object to processing.** You have the right to object to certain types of processing, including processing for direct marketing (i.e. receiving promotional emails from us which we think will be of interest to you or being contacted with varying potential opportunities).
- **The right to be informed.** You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this Policy.
- **The right of access.** You have the right to obtain access to your information (if we're processing it), and certain other information (similar to that provided in this Policy). This is so you're aware and can check that we're using your information in accordance with data protection law.
- **The right to rectification.** You are entitled to have your information corrected if it is inaccurate or incomplete. You can request that we rectify any errors in information that we hold.
- **The right to erasure.** This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there is no compelling reason for us to keep using it. This is not a general right to erasure, there are exceptions.
- **The right to restrict processing.** You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but will not use it further. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in the future.
- **The right to data portability.** You have rights to obtain and reuse your information for your own purposes across different services. For example, if you decide to switch to a new provider, this enables you to move, copy or transfer your information easily between our IT systems and theirs safely and securely, without affecting its usability.
- **The right to lodge a complaint.** You have the right to lodge a complaint about the way we handle or process your information with your national data protection regulator.
- **The right to withdraw consent.** If you have given your consent to anything we do with your information, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your information with your consent up to that point is unlawful).

CHANGES TO OUR PRIVACY POLICY

We may periodically make changes to this Policy. We will notify you of any significant changes where we have a relationship with you and otherwise post updated versions on our website.

CONTACT US

If you have any questions, comments and requests regarding this Policy, please get in touch with us: marketing@encompass.tv.