



The relationship is everything

Pennington & Partners

International Business Facilitators

Privacy Policy

Pennington and Partners ("We") are committed to protecting and respecting your privacy.

This privacy policy (together with any other documents referred to on our website) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data, how we will treat it and the basis on which it will be disclosed to third parties. By visiting www.penningtonandpartners.com ("our site") and/or registering for any service we offer and/or providing information about yourself you are accepting and consenting to the practices described in this policy.

For the purpose of the General Data Protection Regulation 2018, the data controller is John Pennington of Bramerton Business Centre, Bramerton Road, Hockley, Essex SS5 4PJ

INFORMATION WE MAY COLLECT ABOUT YOU

We may collect and process the following data about you:

- **Information you give us.** You may give us information about you by filling in forms on our site www.penningtonandpartners.com or by corresponding with us by phone, e-mail or otherwise.
 - This includes information you provide if you are required to register to use our site, subscribe to a service we offer, sign up for newsletters, request further information, participate in discussion boards if available on our site, or other social media functions on our site and when you report a problem with our site.
 - The information you give us may include your name, address, e-mail address and phone number, personal description and photograph, educational and employment history.
- **Information we collect about you.** With regard to each of your visits to our site we may automatically collect the following information:
 - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
 - information about your visit or visits from your IP address, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page

response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

- **Information we receive from other sources.**
 - We may receive information about you if you use any of the other websites we operate or the other services we provide. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them;
 - We may receive information about you from your employer where you access services under a corporate subscription.
 - We may collect your personal details from other sources including where emails are forwarded to you or where we receive your contact details in an automatic out of office response to an email sent by us.

COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. Some functions of the website may not be available if cookies are disabled. For detailed information on the cookies we use and the purposes for which we use them see our [Cookie Policy](#).

USES MADE OF THE INFORMATION

We may use information held about you in the following ways:

- to tailor the content that we display to you;
- to deliver the service and to correspond with you in relation to any product or service;
- to provide you with information about other goods and services we offer that are similar to those that you have already used;
- to notify you about changes to our service;
- to ensure that content from our site is presented in the most effective manner for you and for your computer or other device used to access our site.
- for system administration and to report aggregated statistical information about browsing patterns and actions which does not identify any individual;
- to store usage logs which may be used by us to provide existing and potential authors, contributors, associations we partner with, subscribers and clients with firm-level (ie not individual) information about the user base and usage patterns;
- to administer our site and for internal operations, including product development, troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

- we may combine information received from other sources with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above.

DISCLOSURE OF YOUR INFORMATION

We will not share your personal information with other third parties without your consent but may do so in the following situations:

- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply any terms and conditions and other agreements published on our site; or to protect the rights, property, or safety of Pennington and Partners, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction;
- where we share aggregated information which does not identify individuals with potential authors, contributors, subscribers and clients;
- where we are requested to provide information by authorised third parties or regulatory or governmental agencies investigating illegal activities;
- where we believe that an emergency, illegal activity or some other reasonable basis exists for notifying the relevant authority;
- where we use sub-contractors to provide the service. Any such sub-contractor will only use your personal information for the purposes of providing services to us and will have no right to use your personal information for its own purposes;
- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Pennington and Partners or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. Save as expressly stated, we do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users. We may also use such aggregate information to help advertisers reach the kind of audience they want to target. We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.
- We may hold events including seminars and conferences which are sponsored by third parties or have third party speakers. Where you register for one of these events we may share your details with those third parties.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.
- We use third party payment processing services when you make payment through our site. We do not have access to any credit card or other financial information processed by the third party.

WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, hosting or maintaining our websites, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

SECURITY

We employ security measures to ensure that your personal information is kept secure.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

YOUR RIGHTS

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. We may also give you choices about how we use your information which you can exercise by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at info@penningtonandpartners.com

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

ACCESS TO INFORMATION

The General Data Protection Regulation 2018 gives you the right to access information held about you. Your right of access can be exercised in accordance with the regulations.

CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy. The date at the bottom of this page indicates when this privacy policy was last updated.

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to info@penningtonandpartners.com

www.penningtonandpartners.com - March 2018