



WIREWAX PRIVACY NOTICE

WIREWAX respects the privacy of every person who interacts with WIREWAX and we are committed to ensuring high standards of data protection compliance in everything we do.

1 WHAT IS THE PURPOSE OF THIS NOTICE?

- 1.1 This privacy notice applies to all services we provide across the web, social media, apps and elsewhere (the “**WIREWAX Services**”). It explains our approach to how we use any personal information that is provided to or collected by us in connection with your use of the WIREWAX Services or any other interaction you have with WIREWAX.
- 1.2 This privacy notice also sets out the legal basis on which we are permitted to process your personal information, your rights in respect of our use of your personal information, how you can verify what personal information is collected by us, and how you can request that we delete, update or transfer it.
- 1.3 This privacy notice is intended to assist you in making informed decisions when using the WIREWAX Services. Please read it thoroughly.
- 1.4 The privacy notice covers various groups of people about whom we collect and process data:
 - Visitors to our website, which is open to all – see section 4
 - Users of our Studio, which is subject to a services contract with WIREWAX – see section 5
 - Viewers of interactive videos via our video player – see section 6
 - Participants or those who feature in the content of our interactive videos – see section 7

2 WHO ARE WE?

- 2.1 The WIREWAX Services are operated by WIREWAX Limited (“**WIREWAX**”, “**we**” “**us**” or “**our**”).
- 2.2 WIREWAX Limited is registered at the UK Information Commissioner’s Office with registration number: ZA455791
- 2.3 WIREWAX Limited is an English company with registered company number: 06963239 and whose registered address is 15 Rathbone Place, Floor 3, London, England, W1T 1HU.

3 HOW TO CONTACT US?

- 3.1 If you have any questions about this privacy notice or want to exercise your rights, please contact us by:
 - *sending an email to privacy@wirewax.com; or*
 - *writing to us at WIREWAX 15 Rathbone Place, Floor 3, London, England, W1T 1HU.*

4 VISITORS TO OUR WEBSITE

A. WHAT PERSONAL INFORMATION DO WE COLLECT ABOUT VISITORS TO OUR WEBSITE AND HOW DO WE COLLECT IT?

When you visit and/or register your details on www.wirewax.com (or other website or app we provide, other than the Studio Services below) personal information may be collected from you in the following ways:

➤ **Information you voluntarily provide to us directly.**

We collect and maintain personal information that you voluntarily submit to us for example when you sign up for a newsletter, enter a survey or competition, post comments or make other contact with us.

This may include:

- *Name;*
- *Email Address;*
- *or other information you submit to us.*

➤ **Information you voluntarily provide to us through social media log in.**

We collect and maintain personal information from your social media profile that you voluntarily agree to be provided to us when you register or sign up, or take part in a survey etc using our social media (such as Facebook or Google) login functionality.

This may include:

- *Name;*
- *Date of Birth;*
- *Gender;*
- *Social media ID;*
- *Email address.*

➤ **Information we collect through your use of the WIREWAX website.**

We collect, through our use of cookies or other technologies, information about your use of and navigation around the WIREWAX website, including information regarding your mobile device or the computer hardware and software used to access the WIREWAX Services.

This may include the following:

- *IP address of device(s) used;*
- *browser type;*
- *operating system and device type;*
- *approximate location (e.g. London);*
- *access times and dates;*
- *referring website addresses;*
- *navigation around the site;*
- *links followed, including in emails;*
- *time spent on pages or viewing content;*
- *types of content viewed and shared.*

Please see the Data Analytics, Insight and Profiles section below and our Cookie Section below for further information.

B. HOW DO WE USE THE PERSONAL INFORMATION ABOUT VISITORS TO OUR WEBSITE?

We use the personal information we collect from or about visitors to the website for the following purposes:

➤ **Sending you newsletters or other communications (from WIREWAX) for which you have subscribed.**

Where you have requested that we send you newsletters and other marketing materials about WIREWAX products and services which we think you might be of interest to you.

What is our legal basis for this?

We rely on your consent to be able to do this – given at the time that you request the newsletter or other marketing.

➤ **Running surveys, competitions and/or promotions.**

We may collect and use your personal information in connection with any survey, competition and/or promotion that you enter.

What is our legal basis for doing this?

It is in our legitimate interest to use your personal information in such a way to operate the survey, promotion and/or competition.

➤ **Data Analytics, Insight and Profiles.**

We analyse your personal information including that which we observe about you from your interactions with the WIREWAX website and our email communications with you.

This information is used to create insights about usage habits across our website. By using this information, we are able to measure how visitors use WIREWAX website.

What is our legal basis for doing this?

Where your personal information is completely anonymised, we do not require a legal basis to use it as the information will not constitute “personal information” that is regulated under data protection laws. However, our collection and use of such anonymised personal information may still be subject to other laws where your consent is required. Please see our Cookie Section below for further details.

Where your personal information is not in an anonymous form, it is in our legitimate interest to use your personal information in such a way to ensure that we provide the very best content and services to you and our other users.

5 STUDIO - REGISTERED USERS

A. WHAT PERSONAL INFORMATION DO WE COLLECT ABOUT OUR STUDIO USERS?

When you register with or log in to the Wirewax Studio personal information may be collected from you or provided to us about you in the following ways. This applies whether you have your own individual account and contract with Wirewax, or are an employee or other authorised user or invitee under a corporate account:

➤ **Information provided to us directly.**

We collect and maintain personal information that you voluntarily submit to us for example when you register, log in or make other contact with us.

This may include:

- *Name;*
- *Email Address;*

- *Address;*
- *City or Country;*
- *Date of Birth.*

If you are logging in as an employee or other authorised user or invitee under a corporate account we will have been provided with the following to identify and authorise your access:

- *Name;*
- *Email Address.*

➤ **Information you voluntarily provide to us through social media log in.**

We collect and maintain personal information from your social media profile that you voluntarily agree to be provided to us when you register or sign up, or take part in a survey etc using our social media (such as Facebook or Google) login functionality.

This may include:

- *Name;*
- *Date of Birth;*
- *Gender;*
- *Social media ID;*
- *Email address.*

➤ **Information we collect through your use of the WIREWAX Studio.**

We collect, through our use of cookies or other technologies, information about your use of and navigation around the WIREWAX Studio.

This may include the following:

- *IP address of device(s) used;*
- *browser type;*
- *operating system and device type;*
- *approximate location (e.g. London);*
- *access times and dates;*
- *navigation around the Studio.*

Please see the Data Analytics, Insight and Profiles section below and our Cookie Section below for further information.

B. HOW DO WE USE THE PERSONAL INFORMATION ABOUT STUDIO USERS?

We use the personal information we collect from or about Studio Users for the following purposes:

➤ **Provision of the WIREWAX Service.**

We need to use your information to log you in, verify who you are, ensure you get the service that you have registered for and otherwise to provide you with our services.

What is our legal basis?

It is necessary for the performance and fulfilment of the contract between us, or with the entity authorising you to access the Studio, to provide you with services for which you have registered.

➤ **Sending you newsletters or other communications (from WIREWAX).**

Where you are a registered customer/user we may use your personal information to send you newsletters and other marketing materials about WIREWAX products and services which we think you might be of interest to you.

What is our legal basis for this?

It is in our legitimate interest to process your information in this way to improve our service and grow our business.

➤ **Data Analytics, Insight and Profiles.**

We analyse your personal information including that which we observe about you from your interactions with the WIREWAX Studio and, our email communications with you and/or the products and services you may have purchased or viewed.

This information is used to create insights about usage habits across our services. By using this information, we are able to measure the effectiveness of our services and how users use the WIREWAX Services.

What is our legal basis for doing this?

Where your personal information is completely anonymised, we do not require a legal basis to use it as the information will not constitute “personal information” that is regulated under data protection laws. However, our collection and use of such anonymised personal information may still be subject to other laws where your consent is required. Please see our Cookie Section below for further details.

Where your personal information is not in an anonymous form, it is in our legitimate interest to use your personal information in such a way to ensure that we provide the very best content and services to you and our other users.

➤ **Publishing content you provide.**

If you provide us with any content (e.g. photos or videos) the content may contain your personal information, or that of others who also appear or are mentioned, in the form of images or other information that may identify you or them.

What is our legal basis for doing this?

It is in our legitimate interest to use personal information in such a way to operate the service.

6 VIEWERS OF INTERACTIVE VIDEOS – VIA THE WIREWAX PLAYER

A. WHAT PERSONAL INFORMATION DO WE COLLECT ABOUT VIEWERS?

When you view a Wirewax interactive video on a Wirewax Player personal information may be collected from you in the following ways:

➤ **Information we collect through your use of the WIREWAX Player.**

We collect, through our use of cookies or other technologies, information about your use of and navigation around the WIREWAX Player and Videos, including information regarding your mobile device or the computer hardware and software used to access the WIREWAX Player.

This may include the following:

- *IP address of device(s) used;*
- *browser type;*

- *operating system and device type;*
- *approximate location (e.g. London);*
- *access times and dates;*
- *referring website addresses;*
- *navigation around and mouse position over the Player and Video;*
- *time spent viewing content;*
- *interactions and interactivity used.*

Please see the Data Analytics, Insight and Profiles section below and our Cookie Section below for further information.

➤ **Information you voluntarily provide to us directly.**

We collect and maintain personal information that you voluntarily submit to us for example when you enter a survey or competition, post comments or otherwise respond to request for information in the videos.

This may include:

- *Name;*
- *Email Address;*
- *or other information you submit to us when you enter text into content fields.*

B. HOW DO WE USE THE PERSONAL INFORMATION ABOUT VIEWERS?

We use the personal information we collect from or about Viewers for the following purposes:

➤ **Data Analytics, Insight and Profiles.**

We analyse your personal information including that which we observe about you from your interactions with the WIREWAX Player and videos viewed.

This information is used to create insights about usage habits across our services. By using this information, we are able to measure the effectiveness of our services and how users use the WIREWAX Services.

What is our legal basis for doing this?

Where your personal information is completely anonymised, we do not require a legal basis to use it as the information will not constitute “personal information” that is regulated under data protection laws. However, our collection and use of such anonymised personal information may still be subject to other laws where your consent is required. Please see our Cookie Section below for further details.

Where your personal information is not in an anonymous form, it is in our legitimate interest to use your personal information in such a way to ensure that we provide the very best content and services to you and our other users.

➤ **Provision of the WIREWAX Service.**

We use your information that you voluntarily submit to us to fulfil the purpose of the submission and ensure you get the service that you have requested or responded to and otherwise to provide you with our services.

What is our legal basis?

It is necessary for the performance and fulfilment of the contract between us, or with the entity providing the video, to provide you with services you have requested or responded to.

➤ **Sharing information with third brands**

We may share your personal information in the analytics data with our clients who created and own the videos on an anonymised basis.

We may share the personal information you voluntarily submit with our clients who created and own the videos in the context of the purpose for which it was requested and in which you submitted it.

What is our legal basis for doing this?

It is in our legitimate interests to share your personal information in such a way to ensure that we provide the very best service we can to you.

7 PARTICIPANTS – THOSE WHO FEATURE IN THE VIDEO CONTENT

A. WHAT PERSONAL INFORMATION DO WE PROCESS ABOUT PARTICIPANTS?

Your image or likeness, or other information about you may appear in content that is used in our videos and is displayed in our player. This content will have been provided to us by our clients or users of the Studio.

We may add further information to that data through image recognition technology such as your name if that is publically available or we are given it by you or our client.

B. HOW DO WE USE THE PERSONAL INFORMATION ABOUT PARTICIPANTS?

We use the personal information from or about participants who appear in the videos for the following purposes:

➤ **Publishing content.**

We make available the content that we are provided, within the videos that we create with our clients, on their sites or in our player.

What is our legal basis for doing this?

It is in our legitimate interest to use personal information in such a way to operate the service.

8 OTHER USE OF YOUR DATA THAT APPLIES TO ALL GROUPS OF PEOPLE ABOUT WHOM WE PROCESS DATA

➤ **Service Administration.**

We may also use your personal information to:

- *help improve the WIREWAX Services; and*
- *contact you to answer any queries you may have sent to us.*

What is our legal basis for doing this?

It is in our legitimate interest to use your personal information in such a way to ensure that we provide the very best service we can to you.

➤ **Sharing information with third party processors.**

We may share your personal information with third party processors in order to provide the WIREWAX Services and associated products and services to you. This includes companies that for example that host our servers or manage our databases for us. They have no independent rights to use your data and are strictly controlled by us under contract.

What is our legal basis for doing this?

It is in our legitimate interests to share your personal information in such a way to ensure that we provide the very best service we can to you.

➤ **Business administration, record keeping and legal compliance.**

We use your personal information for the following business administration and legal compliance purposes:

- *to comply with our legal obligations;*
- *to enforce our legal rights;*
- *protect rights of third parties; and*
- *in connection with a business transition such as a merger, acquisition by another company, or sale of all or a portion of our assets.*

Use in this way may involve us sharing your personal information with professional advisers such as lawyers and accountants and/or governmental or regulatory authorities.

What is our legal basis?

It is in our legitimate interest to ensure that we keep our records up-to-date and use them in connection with a business transition, enforce our legal rights, or to protect the rights of third parties. Otherwise, it is our legal obligation to use your personal information to comply with any legal obligations imposed upon us or other laws regulations that we are subject to.

9 HOW DO WE OBTAIN YOUR CONSENT?

9.1 Where use of your personal information by us requires your consent, you may provide such consent:

- at the time we collect your personal information by following the instructions we give; or
- by informing us using the contact details set out in this privacy notice.

10 USE OF COOKIES

10.1 The WIREWAX Services may use certain cookies and other technologies of which you should be aware.

WHAT ARE COOKIES?

Cookies and similar technologies are very small text documents or pieces of code, which often include an anonymous unique identifier. When you visit a website or use an application, a computer asks your computer or mobile device for permission to store this file on your computer or mobile device and access information from it. Information gathered through cookies and similar technologies may include the date and time of visits, preferred country of residence and how you are using the particular website or application. Cookies are used by us as part of our services and they are also used by some of our third party partners.

For more details on cookies and similar technologies please visit [All About Cookies](#). For the purposes of the remaining sections of this Cookie Policy we will refer to all technologies using the above features as “cookies”.

CONSENT TO OUR USE OF COOKIES

By using the services you acknowledge that we may store and access cookies on your computer or other device including consenting to certain cookies that are not essential to the operation of our services but allow us to provide additional functionality or to gather

additional information about your use of our services. You are not obliged to give consent to our use of non-essential cookies.

If you wish to block or delete cookies, or you would like to withdraw consent to our use of non-essential cookies, you can find out how to do so below.

WHAT DO WE DO WITH COOKIES?

Essential Cookies

We use cookies where they are essential for the operation of the services, for example to remember that you are signed in to the service.

Session Cookies

We use cookies to allow the service to uniquely identify your browsing session on our services, which allows us to coordinate this information with data from our server.

Analytics Cookies

We use “analytics” cookies. These, along with other information, allow us to calculate the aggregate number of people using the services and which features of our services are most popular.

We use this information to improve the services. We do not generally store any information that you provide to us in a cookie.

Social Media

We use cookies to personalise your interaction with social media, such as Twitter, Facebook, Tumblr and YouTube. Such cookies recognise users of those social media sites when you view social media content on our services. They also allow you to quickly share content across social media, through the use of simple ‘sharing’ buttons.

Our services also contain features that enable you to use your Facebook or other social media or Google account to sign in and create/maintain an account with us and to enable us to store your content. This involves the use of cookies.

WHAT HAPPENS WHEN YOU REFUSE, BLOCK OR DELETE COOKIES?

In order to use some parts of our services you will need to accept cookies. If you choose to withhold consent to our use of cookies, or you subsequently block or delete cookies, some aspects of our services may not work properly and you may not be able to access all or part of our services.

CAN YOU BLOCK COOKIES?

You can block the use of cookies altogether by activating the relevant settings in your browser or by following the link below. For more information on cookie management and blocking or deleting cookies for a wide variety of browsers, visit [All About Cookies](#).

11 THIRD PARTY LINKS AND SERVICES

- 11.1 The WIREWAX Services may contain links to third party websites and services. Please remember that when you use a link to go from the WIREWAX Services to another website or you request a service from a third party, this privacy notice no longer applies.
- 11.2 Your browsing and interaction on any other website, or your dealings with any other third party service provider, is subject to that website’s or third party service provider’s own rules and policies.

- 11.3 We do not monitor, control, or endorse the privacy practices of any third parties. We encourage you to become familiar with the privacy practices of every website you visit or third party service provider that you deal with and to contact them if you have any questions about their respective privacy policies and practices.

12 TRANSFERS OUTSIDE THE EEA

- 12.1 We may transfer your personal data outside the EEA to processors outside the EEA including in the USA, in connection with our business or for legal reasons. We will ensure that the transfer is lawful and that there are appropriate security arrangements.
- 12.2 If the European Commission has decided that a country does not provide an adequate level of protection in relation to data that is transferred there, we will enter into an agreement ensuring appropriate and suitable safeguards with our group member, processors or other transferee. This may be via binding corporate rules or on standard terms adopted by the Information Commissioner and approved by the European Commission.

13 HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION FOR?

- 13.1 We do not keep your personal data for any specific period but will not keep it for longer than is necessary for our purposes.
- In considering how long to keep it, we will take into account its relevance to our business and our legal and regulatory obligations.

14 CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL INFORMATION

- 14.1 We are committed to keeping the personal information you provide us secure and we will take reasonable precautions to protect it from loss, misuse or alteration.
- 14.2 We have implemented information security policies, rules and technical measures to protect the personal information that we have under our control from:
- unauthorised access;
 - improper use or disclosure;
 - unauthorised modification; and
 - unlawful destruction or accidental loss.
- 14.3 All our employees and data processors (i.e. those who process your personal information on our behalf, for the purposes listed above), who have access to, and are associated with the processing of personal information, are obliged to respect the confidentiality of the personal information of all users of the WIREWAX Services.

15 HOW TO ACCESS YOUR INFORMATION AND YOUR OTHER RIGHTS?

- 15.1 You have the following rights in relation to the personal information we hold about you:
- Your right of access.
If you ask us, we'll confirm whether we're processing your personal information and, if so, provide you with a copy of that personal information (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.
 - Your right to rectification.
If the personal information we hold about you is inaccurate or incomplete, you're entitled to have it rectified. If we've shared your personal information with others, we'll let them know

about the rectification where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

- Your right to erasure.

You can ask us to delete or remove your personal information in some circumstances such as where we no longer need it or you withdraw your consent (where applicable). If we've shared your personal information with others, we'll let them know about the erasure where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

- Your right to restrict processing.

You can ask us to 'block' or suppress the processing of your personal information in certain circumstances such as where you contest the accuracy of that personal information or object to us processing it. It won't stop us from storing your personal information though. We'll tell you before we lift any restriction. If we've shared your personal information with others, we'll let them know about the restriction where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

- Your right to data portability.

You have the right, in certain circumstances, to obtain personal information you've provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or ask us to transfer this to a third party of your choice.

- Your right to object.

You can ask us to stop processing your personal information, and we will do so, if we're:

- *relying on our own or someone else's legitimate interests to process your personal information except if we can demonstrate compelling legal grounds for the processing;*
- *processing your personal information for direct marketing; or*
- *processing your personal information for research unless such processing is necessary for the performance of a task carried out in the public interest.*

- Your rights in relation to automated decision-making and profiling.

You have the right not to be subject to a decision when it's based on automatic processing, including profiling, and it produces a legal effect or similarly significantly affects you unless such profiling is necessary for entering into, or the performance of, a contract between you and us.

- Your right to withdraw consent.

If we rely on your consent (or explicit consent) as our legal basis for processing your personal information for certain uses, you have the right to withdraw that consent at any time for those uses.

- Your right to lodge a complaint with the supervisory authority.

If you have a concern about any aspect of our privacy practices, including the way we've handled your personal information, you can report it to the UK Information Commissioner's

Office (ICO). You can find details about how to do this on the ICO website at <https://ico.org.uk/concerns/> or by calling their helpline on 0303 123 1113.

16 CHANGE TO THIS PRIVACY NOTICE

16.1 We may make changes to this privacy notice from time to time

16.2 To ensure that you are always aware of how we use your personal information we will update this privacy notice from time to time to reflect any changes to our use of your personal information. We may also make changes as required to comply with changes in applicable law or regulatory requirements. We may notify you by email of any significant changes. However, we encourage you to review this privacy notice periodically to be informed of how we use your personal information.

Last updated: 1 September 2018