

## **PRIVACY NOTICE – SMITH DAVIS PRESS (A TRADING NAME OF OOH-AR LIMITED)**

### **THIS PRIVACY NOTICE SHALL BECOME EFFECTIVE AS OF 25 MAY 2018.**

At Smith Davis Press, we understand that we have a responsibility to protect and respect your privacy and look after your personal data.

This Privacy Notice, inclusive of our General Terms of Service, explains what personal data we collect, how we use your personal data, reasons we may need to disclose your personal data to others and how we store your personal data securely.

For clarity, Smith Davis Press may be both data controller and data processor for your personal data under certain circumstances.

We must advise that this policy is subject to change, so please check our website on a regular basis for any further changes.

Data Protection law will change on 25 May 2018

This Privacy Notice sets out your rights under the new laws.

#### **Who are we?**

Smith Davis Press is a provider of augmented reality, contract publishing and associated content creation services, registered company number 2139057. Andrew Jackson is the registered Data Protection Officer for Smith Davis Press.

#### **How the law protects you**

Data protection laws state that we are only able to process personal data if we have valid reasons to do so. The reasons we process your personal data include, but are not limited to, your consent, performance of a contract, billing and to contact you.

#### **How do we collect personal data from you?**

We receive information from you when you contact us by phone, email or otherwise in respect of any of our products and services or during the purchasing of any such product. Additionally we may also collect information from you when you sign up, enter a competition, promotion or survey or when you inform us of any other matter.

If you provide us with personal data about a third party you warrant that you have obtained the express consent from the third party for the disclosure and use of their personal data.

Your personal data may be automatically collected when you use our services, including but not limited to, your IP address, device-specific information, server logs, device event information, location information and unique application numbers.

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### **What type of data do we collect from you?**

The personal data that we may collect from you includes your name, address, email address, phone numbers, payment information and IP addresses. We may also keep details of your visits to our site including, but not limited to traffic data, location data, weblogs and other communication data. We also retain records of your queries and correspondence, in the event you contact us.

Please be aware that any video, image, or other content posted, uploaded or otherwise made available by you, whether published content or not, is not subject to our Privacy Notice.

We merely process such data on your behalf, subject to our Terms and Conditions and you are responsible for any applicable legal requirements in respect of your content.

### **How do we use your data?**

We use information about you in the following ways:

- To process orders that you have submitted to us;
- To provide you with products and services;
- To comply with our contractual obligations we have with you;
- To help us identify you and any accounts you hold with us;
- To enable us to review, develop and improve our services;
- To provide customer care, including responding to your requests if you contact us with a query;
- To administer accounts, process payments and keep track of billing and payments;
- To detect fraud and to make sure what you have told us is correct;
- To carry out marketing and statistical analysis;
- To review job applications;
- To notify you about changes to our website and services;
- To provide you with information about products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes; and
- To inform you of service and price changes.

### **Retention periods**

We will keep your personal data for the duration of the period you are a customer of Smith Davis Press. We shall retain your data only for as long as necessary in accordance with applicable laws.

On the closure of your account, we may keep your data for up to 7 years after you have cancelled your services with us. We may not be able to delete your data before this time due to our legal and/or accountancy obligations. We may also keep it for research or statistical purposes. We assure you that your personal data shall only be used for these purposes stated herein.

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**Who has access to your personal data?**

Here is a list of all the ways that we may use your personal data and how we share the information with third parties.

**Our services**

We process your data for administration, billing, support and the provision of services. Your data may be sent to third party suppliers both within and outside of the EEA.

**Third Parties**

For the avoidance of doubt, we do not and never shall sell your personal data to third parties for marketing or advertising purposes.

We work closely with a number of third parties (including business parties, service providers and fraud protection services) and we may receive information from them about you. These third parties may collect information about you including, but not limited to, your IP address, device-specific information, server logs, device event information, location information, and unique application numbers. We use their features within our website, however, in some instances, they may be acting as data controller and they will have their own privacy policies, which we advise you to read. We may pass your personal data to third parties for the provision of services on our behalf (for example processing your payment). However, we will only ever share information about you that is necessary to provide the service and we have specific contracts in place, which ensure your personal data is secure and will not be used for any marketing purposes.

We may share your information if we are acquired by a third party and therefore your data will be deemed an asset of the business. In these circumstances, we may disclose your personal data to the prospective buyer of our business, subject to both parties entering into appropriate confidentiality undertakings. Similarly, we may share your personal data if we are under a duty to disclose data in order to comply with any legal obligation or to protect the rights, property, or safety of Smith Davis Press, our customers, or others. This includes but is not limited to exchanging information with other companies and organisations for the purposes of fraud protection, credit risk reduction and dispute policies. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

**Your rights**

In preventing the use or processing of your personal data, it may delay or prevent us from fulfilling our contractual obligations to you. It may also mean that we shall be unable to provide our services or process the cancellation of your service. You have the right to object to our use of your personal data, or ask us to delete, remove or stop using it if there is no need for us to keep it. This is known as your right to be forgotten. There are legal and accountancy reasons why we will need to keep your data, but please do inform us if you think we are retaining or using your personal data incorrectly.

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Our Privacy Notice shall be made clear to you at the point of collection of your personal data.

You can view, edit or delete your personal data by contacting us at [privacynotice@ooh-ar.com](mailto:privacynotice@ooh-ar.com). You can also make choices about Smith Davis Press' collection of your data and how we use it.

You have the right to ask us not to process your personal data for marketing purposes.

We will not contact you for marketing purposes unless you have given us your prior consent. You can change your marketing preferences at any time by contacting us.

### **Accessing and updating your data**

You must maintain the accuracy of your information and ensure all your details, including but not limited to, name, address, title, phone number, e-mail address and payment details are kept up to date at all times.

You have the right to access the information we hold about you. Please email your requests to [privacynotice@ooh-AR.com](mailto:privacynotice@ooh-AR.com) so that we can obtain this information for you.

### **Links to other sites**

Smith Davis Press may provide links to third party sites. Since we do not control those websites, we encourage you to review the privacy policies of these third party sites. Any information that is supplied on these sites will not be within our control and we cannot be responsible for the privacy policies and practices of these.

### **Where we store your personal data**

We follow accepted ISO standards to store and protect the personal data we collect, including the use of encryption if appropriate.

All information you provide to us is stored on our secured servers.

From time to time, your information may be transferred to and stored in a country outside the EEA in relation to provision of the services. The laws in these countries may not provide you with the same protection as in the EEA; however, any third party referred to above outside of the EEA has agreed to abide by European levels of data protection in respect of the transfer, processing and storage of any personal data. By providing your data to us, you agree to this transfer and storage. However, we will ensure that reasonable steps are taken to protect your data in accordance with this privacy notice.

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As the transmission of information via the internet is not completely secure, we cannot guarantee the security of your data transmitted to our site and 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.

Any sensitive data (payment details for example) are encrypted and protected.

### **Liability**

We agree to take reasonable measures to protect your data in accordance with applicable laws.

### **Data Breaches**

In the event of a data breach, we shall ensure that our obligations under applicable data protection laws are complied with where necessary.

### **Contact us**

Please e-mail any questions or comments you have about privacy to us at [privacynotice@ooh-AR.com](mailto:privacynotice@ooh-AR.com)

### **Your right to make a complaint**

You have the right to make a complaint about how we process your personal data to the Information Commissioner:

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

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: 0303 123 1113