

Privacy Policy

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1. What is the purpose of this Privacy Policy?

- 1.1. This Privacy Policy applies to personal information collected by the trading entities in the Exterior Media Group. (**Exterior Media**). Find out more about the Exterior Media Group by clicking [here](#).
- 1.2. When we refer to “**Exterior Media**”, “**we**” or “**us**”, we mean the relevant trading entity within the Exterior Media Group that acts as the controller or processor of your information.
- 1.3. This Privacy Policy explains how Exterior Media may use and seeks to protect any personal data which is collected from you.
- 1.4. Personal data may be collected when you:
 - a) register for, purchase or use any of our products and/or services (the **Products**);
 - b) use any of Exterior Media’s websites including any subdomains that may be made available by us from time to time and including (but not limited to) websites containing the URL ‘exteriormedia.com’, ‘exteriormedia.co.uk’ and the following websites (**Websites**):
 - i. www.exteriormedia.com
 - ii. www.exteriormedia.com/uk
 - iii. www.exteriormedia.com/ni
 - iv. www.exteriormedia.com/ie
 - v. www.exteriormedia.com/fr

- vi. www.exterionmedia.com/nl
 - vii. www.exterionmedia.com/it
 - viii. www.exterionmedia.com/es
 - ix. pt.exterionmedia.com
 - x. www.interactiveeurope.com
 - xi. www.workshopplay.co.uk
 - xii. www.workshopplay.ie
 - xiii. www.exterionmedia.london
 - xiv. www.culturemondays.co.uk
 - xv. www.150brands.co.uk
 - xvi. www.exterion.live
- c) use any of Exterion Media's social media channels including (but not limited to) Twitter, Instagram, Facebook and LinkedIn (**Social Media Channels**);
 - d) use the "Contact Us" section on the Websites or contact or interact with Exterion Media by any other means;
 - e) use the Olark chat functionality or other chat or interactive functionality on the Websites;
 - f) email or call Exterion Media for any purpose; or
 - g) send personal data to Exterion Media by any other means.

2. What is personal data?

- 2.1. Personal data for the purpose of this Privacy Policy is as defined by the Data Protection Act 1998 including where applicable any amendments brought about by the implementation of the EU General Data Protection Regulation ((EU) 2016/679) (**GDPR**) (**Act**).
- 2.2. Personal data includes information which can identify you as a living individual, whether by itself or when used in conjunction with other information which we hold.

3. What is sensitive personal data?

- 3.1. This category of personal data is more sensitive and relates to, for example, a person's race, sexual orientation, criminal allegations or offences, trade union memberships or their mental or physical health.
- 3.2. Sensitive personal data may be collected by us from you if you place an order with us, enter into specific research activities, when you wish to attend an event with us or otherwise with your consent.
- 3.3. We have in place additional measures to protect your sensitive personal data and its confidentiality. We may use your sensitive personal data in order to deliver our Products to you, to meet your requirements or to deal with any requests made by you.
- 3.4. We will only disclose your sensitive personal data to the third parties as referred to in this Privacy Policy, with your consent or where Exterion Media considers it is necessary, subject to us putting in place appropriate security or confidentiality obligations.

4. What personal data do we collect and what do we do with it?

- 4.1. Depending on how you use the Websites, Products and Social Media Channels or otherwise interact with us, we will ask you to provide us with certain personal data which identifies you (whether by itself or together with other information that Exterion Media holds) and which may affect your privacy. In order to supply the Websites and Products to you and to continue interacting with you, Exterion Media have a legitimate interest under the Act to collect and retain such personal data.
- 4.2. Personal data may include data collected in the following circumstances (this is not a definitive list):

- a) fulfilling and contacting you about your requests for Products, other services, and information, including to send you electronic newsletters and to complete transactions that you have requested;
- b) detecting and preventing fraudulent activity;
- c) enabling you to participate in features such as research (including through our Work.Shop.Play platform found [here](#)) surveys, polls, promotions and message boards;
- d) providing you with electronic newsletters, information, special offers and promotional materials about us (including the Websites) and on behalf of Exterion Media, in accordance with applicable law;
- e) research and analysis of the use of Websites and information about visitors to the Websites to understand and improve our service offerings and, in accordance with our sharing policies, to produce anonymous, pseudonymised or aggregated data and statistics that might help third parties develop our or their own products and service offerings;
- f) customising the content you see when you visit a Website;
- g) developing and providing advertising tailored to your interests;
- h) developing and improving our business (including developing new Products and services; managing our communications; determining the effectiveness of and optimising our advertising; analysing our products, services, Websites Social Media Channels, mobile applications and any other digital assets; facilitating the functionality of our Websites, mobile applications and any other digital assets) and performing accounting, auditing, billing, reconciliation and collection activities;
- i) we may record telephone calls and our Olark Website chats with you for training and/or monitoring purposes;
- j) evaluating your interest in employment with Exterion Media and contacting you regarding possible employment with Exterion Media;
- k) enforcing our Website Terms of Use or other legal rights;
- l) as may be required by applicable laws and regulations or requested by any judicial process or governmental agency having or claiming jurisdiction over Exterion Media;
- m) complying with industry standards and our policies;
- n) providing and operating our competitions, events and promotions;
- o) promoting and marketing Products and services of ours and our Exterion Media partners;
- p) complying with our legal obligations; and
- q) for any other purposes disclosed to you at the time we collect your information or with your consent.

4.3. The personal data we ask for may include:

- a) Name;
- b) Address;
- c) Date of birth;
- d) Email address;
- e) Phone number(s);
- f) Where you heard about us;

- g) Information regarding your personal or professional interests, needs or opinions, demographics, experiences with our Products and contact preferences. Some of this information may constitute sensitive personal data (e.g. if your personal interests relate to your religious or other beliefs or your racial or ethnic origin) which is further defined below;
 - h) Credit/debit card information, billing information and/or delivery address information (if you order Products on the Websites); and/or
 - i) Information you provide in any “free text” boxes on the Websites or Social Media Channels (i.e. blank spaces where you are free to insert comments).
- 4.4. We may also collect other information about you automatically with regard to each of your visits to the Websites or use of our other Social Media Channels. This may include:
- a) technical information, including the 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; and
 - b) information about your visit, including the URL clickstream to, through and from the Websites or Social Media Channels (including date and time), Products you viewed or searched for, page response times, download errors, lengths 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 services numbers.
- 4.5. We may also receive information about you from other sources. These may include:
- a) your employer; and
 - b) other third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, overseas agents and credit reference agencies).
- 4.6. These lists of personal data are not exhaustive and further information may be requested from you when Exterion Media considers it is fair and necessary to do so. Further, the personal data requested by Exterion Media may include sensitive personal data (see “what is sensitive personal data?” below) and it may change or be updated in accordance with the nature of our services and in accordance with legal, regulatory and other good governance requirements.
- 4.7. Wherever reasonably practicable we will distinguish between personal data that you must provide or which must be collected from you in order to be granted the access to the relevant Website, Product or Social Media Channel and any information which you may provide at your discretion.

5. Cookies & Tracking Technology

Cookies

- 5.1. The Websites use cookies. Cookies contain small pieces of information that are transferred to your computer's hard drive. They help us to improve the Websites and to deliver a better and more personalised service. They enable us to:
- a) estimate our audience size and usage pattern;
 - b) store information about your preferences, and so allow us to customise our site according to your individual interests;
 - c) speed up your searches; and

- d) recognise you when you return to our site.
- 5.2. You can find out more about the cookies that we use [here](#). By using this Exterior Media Website you consent to our use of cookies.
- 5.3. If cookies are disabled on your computer, you may be unable to access certain parts of the Exterior Media Websites. You may refuse cookies generally or withdraw your cookie permissions at any time by modifying your browser setting.
- 5.4. The information gathered through these cookies will be used by the Exterior Media entity responsible for the Website accessed and may also be used by other Exterior Media entities for the purposes outlined in this Privacy Policy.

Tracking Technologies

- 5.5. The Websites may also use a technology service called Hotjar. Hotjar helps Exterior Media better understand your experience (e.g. how much time you spend on which pages, which links you choose to click, what you do and don't like) and this enables us to build and maintain our Products and Services more accurately and in line with your requirements.
- 5.6. Hotjar uses cookies (please see the above link for details of cookies used) and other technologies to collect data on your behaviour and your devices (in particular IP addresses (captured and stored only in anonymized form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), preferred language used to display our website).
- 5.7. Hotjar stores this information in a pseudonymized user profile. This is not stored by Exterior Media. Neither Hotjar nor Exterior Media will ever use this information to identify individual users or to match it with further data on an individual user. For further details, please see Hotjar's privacy policy by clicking on this [link](#).
- 5.8. You can opt-out to the creation of a Hotjar user profile, Hotjar's storing of data about your usage of the Websites and Hotjar's use of tracking cookies on other websites by following this [opt-out link](#).

6. [Who do we share your data with?](#)

- 6.1. Exterior Media is committed to maintaining your trust and we want you to understand when and with whom we may share information collected about you.
- 6.2. We may share your data in the following ways:
 - a) in accordance with your instructions or with consent (as applicable according to the sensitivity of the data), including in accordance with any applicable terms in our General, Experiential, Purchase Order or other Terms and Conditions and in compliance with applicable law and legal process;
 - b) to authorised companies who work on our behalf to provide your nominated Exterior Media service. These companies will only use your information to help us provide the Products to you and for no other purposes;
 - c) to other trading companies within the Exterior Media Group;
 - d) to sponsors and third parties who assist with our research, sweepstakes, contests or promotions. These companies may design, administer and implement a promotion, including in connection with winner selection, prize fulfilment and aggregated data analysis. By entering a promotion, you agree to these terms, as well as any promotion specific terms found on our website from time to time;
 - e) in an aggregated or de-identified form with prospects or partners for business or research purposes;
 - f) as part of a substantial corporate transaction, such as a sale of a Website, a merger, consolidation or sale of the business;

- g) to government, law enforcement agencies, the courts and regulatory bodies when legally obliged to;
- h) to defend and protect the legal rights, interests and safety of the Websites, Exterion Media and our employees; and
- i) if you have given Exterion Media feedback to pass to a third party such as via a customer satisfaction survey, we will give your feedback and any personal data you have provided to that third party. They may contact you or use your personal data in accordance with their Privacy Policy.

7. How do we protect your personal information?

- 7.1. We hold your personal information in a combination of electronic and hard copy files. We may store your personal information with a third-party data storage provider.
- 7.2. We take all reasonable steps to ensure that the personal information we hold is protected from misuse, interference and loss, and unauthorised access, modification or disclosure by the use of various methods, including secure storage. Where we store your personal information with a third-party data storage provider, we require them to keep it secure and only use or disclose it for the purpose for which it was provided.
- 7.3. Please contact us immediately if you become aware or have reason to believe there has been any unauthorised use of your personal information that we hold.
- 7.4. We will only keep information about you for as long as we need for the purpose for which it was collected and we will take reasonable steps to ensure that any third party to which we have disclosed your information does the same.

8. Retention of your personal data

- 8.1. We will not keep your personal data or other information for longer than is necessary for the purposes for which it was provided by you unless we are required by law or we have other legitimate interests to keep it longer (for example, if it is necessary to do so for the purposes of legal proceedings).

9. Ensuring that your personal data is accurate

- 9.1. If you have reason to believe that any personal data that we have about you is out of date or inaccurate, please send an email to dataprotection@exterionmedia.co.uk or write to us to notify us of any changes that should be made. We will amend your personal data if you tell us to or if we consider that it contains factual errors or is out of date.

10. How can you withdraw your consent or request not to receive direct marketing?

- 10.1. You can withdraw your consent to our collection, use and disclosure of your personal information at any time by sending us an email at dataprotection@exterionmedia.co.uk. We will action your request as soon as we reasonably can. However, we may not be able to continue to provide the nominated Exterion Media Product or other service to you.
- 10.2. If you've previously indicated to us that you'd like to hear about Exterion Media Products or other services, we may contact you by post, telephone, email or SMS. You can change your preferences or unsubscribe at any time – just send us an email to the address above. We'll action your request as soon as we reasonably can.

11. International Data Transfers

- 11.1. From time to time, we may need to transfer the personal information we collect about you to affiliates or trusted third party recipient in countries other than the country in which the information was originally collected, including the United States of America, India Australia or Canada. Those countries may not have

the same data protection laws as the country in which you initially provided the information. Exterion Media will take steps to ensure that your data is treated securely and in accordance with this Privacy Policy wherever in the world it may be transferred, which steps may include use of the standard contractual clauses for data transfers approved by the European Commission.

- 11.2. By using and participating in any Website or providing us with your information, you consent to the collection, international transfer, storage, and processing of your information for the purposes outlined in this Privacy Policy.
- 11.3. Although personal data may be transferred to other trading companies within the Exterion Media Group, to affiliates and trusted third parties, the Lead Supervisory Authority in respect of cross border transfers to and from trading companies within the Exterion Media Group will be the Information Commissioner's Office (**ICO**) in the United Kingdom. Exterion Media (UK) Limited is registered at Companies House and at the ICO as a data controller.

12. Children

- 12.1. The Websites are intended for a general audience and do not knowingly collect or store personal information about children under the age of 18.

13. User-Generated Content

- 13.1. Some Websites enable users to submit their own content for contests, blogs, videos, message boards, and other functions (**User Generated Content**). Publication of User Generated Content on a Website is subject to any terms of use that may be notified to you prior to your submitting content. Please remember that any information you disclose as or in relation to User Generated Content will be publicly available on publication and exercise caution when deciding to disclose your contact, financial, and other information in a submission. We cannot prevent such information from being used in a manner that may violate this Privacy Policy, the law, or your personal privacy and safety.

14. Third Party Sites

- 14.1. The Websites may contain links to non-Exterion Media websites. When you select a link to a third-party website from one of the Websites, you will be leaving the Exterion Media Website. This Privacy Policy does not cover any information collected through any other website. Any information that you disclose on the third-party site will be governed by that site's Privacy Policy.
- 14.2. You should review the privacy policies of those third-party sites before providing any information to them. We are not responsible or liable for the privacy practices or policies of any websites not operated by Exterion Media or any of its wider Group.

15. Requesting your personal data

- 15.1. You can ask to access personal data that the relevant Exterion Media company (i.e. the company to which your personal data is directed to through the Websites or the company to which you have supplied that personal data) may hold about you. Under UK law you are entitled to:
 - a) access, update or amend the information that we hold about you;
 - b) object to the processing of your information by Exterion Media, including for marketing purposes or otherwise where you have a legitimate reason for doing so
 - c) ask for a copy of any of your personal data in a machine-readable form (such as .CSV) so you can use it elsewhere; and/or

- d) ask us to delete your information. Please note that we may need to retain some information about you in order to satisfy our legal or security obligations or legitimate internal requirements.

15.2. Please [Contact Us](#) if you wish to exercise any of these rights.

16. What if I do not agree with the terms of this Privacy Policy?

16.1. If you do not agree to your personal data being used in accordance with this Privacy Policy please do not submit your personal data to us through the Website, via Social Media Channels or any other means.

16.2. Please note that your access to the Products or any other services or materials offered on the Website or Social Media Channels or otherwise may be restricted if you do not submit personal data when we ask you to do so.

17. Updates to this Privacy Policy

17.1. We may update this Privacy Policy from time to time. If you continue to use the Website, Products or Social Media Channels after changes to this Privacy Policy have been made we will take this to mean that you have read and accepted those changes. If we make any material changes in the way we use your information, we will notify you by sending an email message to the email address you most recently provided to us or by prominently posting a notice of the changes on our Websites.

17.2. You should not use the any Products, Websites or Social Media Channels or supply us with any personal data if you do not accept changes which are made to this Privacy Policy.

18. Contact us

If you have any questions, concerns or comments or if you would like further information about this Privacy Policy and how we handle your personal data please contact us using the “contact us” form on the website or at:

Data Protection (c/o Legal Department)
Exterion Media (UK) Limited
7th Floor, Lacon House
84 Theobalds Road
London WC1X 8NL
dataprotection@exterionmedia.co.uk

Alternatively, please visit the appropriate Exterion Media website and click “contact us” to be put in touch with someone in our local markets.

If you require further information on privacy and data protection generally, please visit the ICO website which oversees data protection compliance in the United Kingdom: <https://ico.org.uk/>