

# EditorEye Privacy Policy

This Privacy Policy describes the information that we gather on, or through, our Services and how we use and process such information. For each processing purpose we will articulate the reason for requiring the data, what data we will process, the legal basis for processing the data and how long we will keep the data.

Where the legal basis of consent is to be used, this will be gathered freely, and we will use clear, plain language that is easy to understand, and you will be able to remove your consent at any point.

References in this Privacy Policy and on our website to “we”, “our” or “us” are references to MarketClusters Limited T/A EditorEye. References to “you” and “your” means each natural or legal person who uses our website or the associated services.

## **1. What information do we collect about you and how do we use it?**

We collect/process information so that we can provide the best possible experience when you utilise our services. This section of the policy will describe the purpose for processing your personal data, the legal basis to do so and how long we will keep your data.

### **1.1. Our Product / Service**

If you choose to use our service, including email notifications, newsletters, product/service updates and user/article tracking, you must provide us with some personal data so that we can provide our services to you; this will include your name and email address. Other non-mandatory personal data may also be gathered. We send your article tracking information to the contracted client.

We will process data using two legal rationales, if you are an individual and not associated with a contracted client we will use legitimate interest based upon our [Terms and Conditions](#). If you are associated with a contracted client we will use legitimate interest as the legal basis to process the data, as we may not have a direct relationship with you as the data subject.

Our ability to retain the personal data will be determined by account activity, if the account is not used for over 2 years we will delete your data. Accounts associated with contracted clients will be deleted on termination of the contract.

### **1.2. Our use of Productivity Tools**

If you choose to use our service, personal data items such as name, email address, telephone number and other non-mandatory personal data may be stored in our corporate cloud application platform, corporate email platform and our help desk platform.

We will process data using two legal rationales, if you are an individual and not associated with a contracted client we will use legitimate interest based upon our [Terms and Conditions](#). If you are associated with a contracted client we will use legitimate interest as the legal basis to process the data.

Our ability to retain the personal data will be determined by account activity, if the account is not used for over 2 years we will delete your data. Accounts associated with contracted clients will be deleted on termination of the contract.

### **1.3. Marketing**

We would like to send you information about new products and services of ours which may be of interest to you. You have a right at any time to stop us from contacting you for marketing purposes. To distribute our marketing information we may use personal data such as names, addresses, email addresses, employer details, job titles, telephone numbers and LinkedIn profiles.

We will process data using the following legal rationale to send marketing information: if your role within an organisation is associated with learning and development we will use legitimate interest as the legal basis to process the data. We use this legal basis after completing a legitimate interest assessment process. The assessment states we will only send low volume, customised messages to business email addresses who, based on their job role, would have a legitimate interest in developing their employees and may find our product useful. If you do not want us to contact you we will provide an unsubscribe facility within the emails or you can email us at [dp@editoreye.com](mailto:dp@editoreye.com).

We will retain personal data for active customer leads for a period of up to 2 years, a lead will be active under the following circumstances

- An email sent by our organisation has not received an unknown account bounce back
- An email has been sent to our organisation from the data subject

#### **1.4. Cookies**

Like many websites, we use cookies and similar technologies to collect additional website usage data and to improve our Services. Website usage information is collected using cookies to monitor aggregate site usage metrics such as total number of visitors, pages viewed and web traffic routing on our Services. We will store the cookie values on our platform to allow us to perform our analysis, however this will not be used to target marketing material to an individual user.

We will process data under the legitimate interest legal basis as we only use the data to perform aggregated tracking analysis and will not target individuals based upon this analysis. You will also need to accept our cookie policy to allow us to process the data.

We will retain active cookie data for a period of up to 1 year, a cookie will remain active if a user re-visits our platform.

Learn more about how we use cookies <https://editoreye.com/cookiepolicy>

## **2. Updating These Terms**

We may change our Service and Policies, and we may need to make changes to these Terms so that they accurately reflect our Service and Policies. Unless otherwise required by law, we will notify you at least 30 days before we make changes to these Terms and give you an opportunity to review them before they go into effect. Then, if you continue to use the Service, you will be bound by the updated Terms. If you do not want to agree to these or any updated Terms, you can request an account deletion.

## **3. Your Rights**

### **3.1. Accessing or Rectifying your personal data**

We want to make sure that your personal information is accurate and up to date and you have the right to request a copy and update the personal data that we hold about you. You may ask us to

correct or remove information you think is inaccurate. If you would like to invoke this right, please email or write to us at [dp@editoreye.com](mailto:dp@editoreye.com) or DP - EditorEye, 1 Hammersmith Broadway, Hammersmith, London, W6 9DL.

### **3.2. Deletion**

Based upon the retention periods described above we will remove your personal data from our platforms.

### **3.3. Object, Restrict or Withdraw Consent**

You may wish to object to or restrict our ability to process your personal data, this can be done either via email or in writing, using the contact details below. Further context may need to be requested to ensure we can carry out the relevant tasks on our platforms to perform the request.

### **3.4. Portability**

You may wish to port your personal data to another platform. If you would like to invoke this right, please email or write to us at [dp@editoreye.com](mailto:dp@editoreye.com) or DP - EditorEye, 1 Hammersmith Broadway, Hammersmith, London, W6 9DL.

## **4. Who We Are And How To Contact Us**

If you are an individual and not associated with a contracted client we are the Data Controller and are responsible for defining and managing how your personal data is processed. If you are associated with a contracted client we will be a data processor and the contract client will be responsible for defining and managing how your personal data is processed.

Our company name is MarketClusters Limited t/a EditorEye

Our company address is 1 Hammersmith Broadway, Hammersmith, London, W6 9DL

Our email address is [dp@editoreye.com](mailto:dp@editoreye.com)

## **5. To Whom We Disclose Information**

Except as described in this Policy, we will not intentionally disclose the Personal Data that we collect or store on the Service to third parties without the consent of the data subject. We may disclose information to third parties if you consent to us doing so, as well as in the following circumstances:

Unrestricted Information

Any information that you voluntarily choose to include in a Public Area of the Service, such as a public profile page, will be available to any Visitor or User who has access to that content.

## **6. Service Providers and Data Sharing**

We work with third party service providers who provide email hosting, core corporate applications, web hosting, maintenance, and other services for us. These third parties may have access to, or process Personal Data as part of providing those services for us. We limit the information provided to these service providers to that which is reasonably necessary for them to perform their functions, and our contracts with them require them to maintain the confidentiality of such information.

Service providers include:

- Amazon Web Services, a subsidiary of Amazon.com, 1200 12th Ave S, Ste 1200, Seattle, WA 98144, United States; for the purpose of Hosting.
- Google, 1600 Amphitheatre Parkway, Mountain View, CA 94043; for the purpose of Corporate Applications
- Slack, 500 Howard Street, San Francisco, CA 94105, United States for the purposes of Messaging Tools
- Mailchimp of The Rocket Science Group, LLC, 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308 USA; for the purposes of Marketing and Email Campaigns
- HubSpot, 25 First Street, 2nd Floor Cambridge, MA 02141 United States; for the purposes as our Marketing CRM
- Freshworks, 54 Fenchurch Street, London, EC3M 3JY; for the purposes of a support desk

### **6.1. Overseas transfers**

The information you provide may be transferred to countries outside the European Economic Area (EEA) that do not have similar protections in place regarding your data and restrictions on its use as set out in this policy. However, we will take steps to ensure adequate protections are in place to ensure the security of your information. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein. By submitting your information, you consent to these transfers for the purposes specified above.

We may transfer your personal information to the following which are located outside the European Economic Area (EEA) as follows:

- Mailchimp of The Rocket Science Group, LLC, 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308 USA; for the purposes of Marketing and Email Campaigns
- HubSpot, 25 First Street, 2nd Floor Cambridge, MA 02141 United States; for the purposes as our Marketing CRM
- Slack, 500 Howard Street, San Francisco, CA 94105, United States for the purposes of Messaging Tools

All of our International service providers have each provided the information to demonstrate they have appropriate technical and organisational measures in place to safeguard personal data, and it shall be processed to at least the same standards as set out by the General Data Protection Regulations: Each organisation participates in The Privacy Shield framework, which is accepted by the European Commission as evidence that an adequate level of protection exists for the personal data in the country, territory, or organisation where it is being transferred, in this case, the United States.

You can obtain a copy of the safeguards and any other of Mailchimp's data protection documentation by visiting <https://mailchimp.com>, or applying via post to Mailchimp, The Rocket Science Group, LLC, 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308 USA.

You can obtain a copy of the safeguards and any other of HubSpot's data protection documentation by visiting <https://www.hubspot.com>, or applying via post to HubSpot, 25 First Street, 2nd Floor Cambridge, MA 02141 United States.

You can obtain a copy of the safeguards and any other of Slack's data protection documentation by visiting <https://www.slack.com/security>, or applying via post to Slack, 500 Howard Street, San Francisco, CA 94105, United States.

## **6.2. Non-Personally Identifiable Information**

We may make non-personally-identifiable information available to third parties for various purposes. This data maybe automatically-collected and would be analysed to create an aggregated view of the data, ensure the reported information was anonymous.

## **6.3. Law Enforcement, Legal Process and Compliance**

We may disclose Personal Data or other information if required to do so by law or in the good-faith belief that such action is necessary to comply with applicable laws, in response to a valid court order, judicial or other government subpoena or warrant, or to otherwise cooperate with law enforcement or other governmental agencies.

## **6.4. Change of Ownership**

Information about data subject, may be disclosed and otherwise transferred to an acquirer, successor or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets and only if the recipient of the personal data commits to a Privacy Policy that has terms substantially consistent with this Privacy Policy.

## **7. Our Data Security**

We have appropriate security measures in place to prevent personal information from being accidentally lost, used or accessed in an unauthorised way.

The following security procedures, and technical and organisational measures to safeguard your personal information have been put in place:

- In cases where personal data is being processed in third countries or third parties, a rigorous data protection impact assessment is being performed to ensure that your data is always secured.
- Our application platform is hosted in ISO 27001 certified secure data centres in the EU.
- Firewalls, intrusion detection and prevention, anti-virus and anti-malware and backup and disaster recovery is in place to prevent data loss or deletion.
- 24/7 security guard, closed circuit television and a door access control system to authorized personnel secures our offices and data centres.
- Our applications are engineered by following industry standards to minimise security vulnerabilities and updates on a regular basis.
- Intrusion detection and prevention secures the network traffic to the servers and applications.
- We regularly apply critical, security patches and firmware updates to operating systems and physical hardware to minimise the risk of vulnerabilities.
- We will use all reasonable efforts to safeguard your personal information. However, you should be aware that the use of the Internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal information which is transferred from you or to you via the Internet.
- We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

- We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

This privacy policy was last updated on May 2018.