

## Mallowstreet Limited Privacy Policy

Mallowstreet Limited (“mallowstreet, we, us”) is committed to protecting your privacy and that of your business and employees, while providing you with the opportunity to receive our services. This privacy notice covers all data subjects whose personal data is collected by mallowstreet.

Privacy information about your use of our online service mallowstreet.com can be found at [www.mallowstreet.com/General\\_Privacy](http://www.mallowstreet.com/General_Privacy)

### Who are we?

Mallowstreet is a niche social networking specialist for the institutional pensions sector in the UK with a community of online and offline pensions sector professionals. We are authorised by the FCA.

### Scope of this Privacy Policy

This Privacy Policy describes:

- [The types of information we process](#)
- [How we use the information](#)
- [How long we retain information](#)
- [How we share the information](#)
- [Protection and storage of the information](#)
- [How to access and control your information](#)

### Data processor

When we use personal information about you in connection with providing our services, we do so as a data processor.

### The types of information we process

We collect your personal information when you provide it to us. Personal information is any information that can be used to identify you or that we can link to you. We may collect information from other sources, such as social media platforms that may share information about how you interact with our social media content.

#### *Information you provide to us*

We collect information that you voluntarily provide to us including when you communicate with us via email or other channels; when you sign up for a webinar or event; and when you respond to our communications or requests for information. The information you provide may include your name, contact information, title, and information about the organisation with which you are affiliated.

If you are applying for employment with mallowstreet, we will collect information about your education and professional experience, certifications and contact details. Your personal information through third parties, including recruitment agencies, social media platforms, business contact or referees may also be collected. You will also be asked to complete a criminal records check, to provide credit information and information for verification purposes. Failure to provide such information when requested may mean that mallowstreet is unable to perform its contractual obligation to you, and may refuse your application for employment.

### *Information we may collect automatically*

We collect data from cookies on our websites to capture information about page visits, browser and device information and IP address (i.e. “performance cookies”). This information is used internally to deliver the most effective content to our visitors. Information from the cookie is used to gauge page popularity, analyse traffic patterns on the sites and guide development or other improvements to the sites.

### *Information we collect from other sources*

We may receive information about you from other sources, including third parties that help us: update, expand, and analyse our records; identify new clients; or prevent or detect fraud. We may also receive information about you from social media platforms including but not limited to when you interact with us on those platforms or access our social media content. The information we may receive is governed by the privacy settings, policies, and/or procedures of the applicable social media platform, and we encourage you to review them.

### **How we use the information**

We may use the information we collect:

- To respond to your enquiries;
- To provide you with information and services that you request;
- To send you marketing communications, and other information or materials that may interest you;
- To maintain our database;
- To understand how people use our online website, including by generating and analysing statistics;
- For the firms’ business purposes, including data analysis; submitting invoices; detecting, preventing, and responding to actual or potential fraud, illegal activities, or intellectual property infringement;
- To assess the effectiveness of our events, promotional campaigns, and publications;
- To evaluate, recruit, and hire personnel; and
- As we believe reasonably necessary or appropriate to: comply with our legal obligations; respond to legal process or requests for information issued by government authorities or other third parties; or protect your, our, or others’ rights.

### **How long we retain information**

We retain your personal information as long as is necessary to comply with our legal obligations, to resolve disputes, to enforce our agreements to support business operations, and to continue to develop and improve our services. Where we retain information for service improvement and development, we take steps to eliminate information that directly identifies you, and we only use the information to uncover collective insights about the use of our services, not to specifically analyse personal characteristics about you.

### **How we share the information**

Mallowstreet does not share information that reasonably identifies you except as expressly described in this Privacy Policy or with your prior express permission. We may share information that does not reasonably identify you.

We may also disclose information we collect where:

- we are under a legal, regulatory or professional obligation to do so (for example, in order to comply with anti-money laundering requirements);
- it is necessary for the purpose of, or in connection with, legal proceedings, or to exercise or defend legal rights;
- it is required or will assist us in providing our services;
- if, in the future, we re-organise or transfer all or part of our business, we may need to transfer your information to new entities from which our business will be carried out. We shall assume you consent to this.

Where we transfer your information internationally we will take reasonable steps to ensure that your information is treated securely and the means of transfer provides adequate safeguards.

### **Protection and storage of the information**

We take steps to hold information securely in electronic or physical form and to prevent unauthorised access, modification or disclosure. Our information security practices are supported by a number of security safeguards, processes and procedures. We store information in access controlled premises or in password protected electronic form. We require our third-party IT providers to comply with appropriate information security industry standards. All staff and third-party providers with access to confidential information are subject to confidentiality obligations. While we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that data, during transmission through the Internet or while stored on our systems or otherwise in our care, is absolutely safe from intrusion by others.

### **How to access and control your information**

#### *Your Choices:*

You have the right to request a copy of your information, to object to our use of your information (including for marketing purposes), to request the deletion or restriction of your information, or to request your information in a structured, electronic format. Below, we describe the tools and processes for making these requests. You may contact us at [privacy@mallowstreet.com](mailto:privacy@mallowstreet.com) to request assistance.

Your request and choices may be limited in certain cases: for example, if fulfilling your request would reveal information about another person, or if you ask to delete information which we or your administrator are permitted by law or have compelling legitimate interests to keep. As a security measure we “back-up” the data stored on our systems therefore such prior information cannot be completely removed from our databases. If you have unresolved concerns, you may have the right to complain to the Information Commissioner’s Office but we would prefer you to contact us first.

*Access and update your information:* We encourage you to promptly inform us with any updates to your personal information at [privacy@mallowstreet.com](mailto:privacy@mallowstreet.com).

*Request that we stop using your information:* In some cases, you may ask us to stop accessing, storing, using and otherwise processing your information where you believe we don't have the appropriate rights to do so. Where you gave us consent to use your information for a limited purpose, you can contact us to withdraw that consent, but this will not affect any processing that has already taken place at the time. You can also opt-out of our use of your information for marketing purposes by contacting us, as provided below.

*Opt-out of communications:* You may opt out of receiving promotional communications from us by using the unsubscribe link within each email or by contacting us at [unsubscribe@mallowstreet.com](mailto:unsubscribe@mallowstreet.com) to have your contact information removed from our promotional email list or registration database.

If you have any questions about our privacy practices, please contact our data protection team at [privacy@mallowstreet.com](mailto:privacy@mallowstreet.com).

**If you are a data controller or a data processor**

If you are a data controller or a data processor in your own right, and you provide personal data to us, you confirm to us that you have a lawful basis for doing so under data protection law and all necessary consents, where required.

**Privacy Policy changes**

The Privacy Policy was last changed on 22/05/2018. We may change, modify, add or remove portions of this Privacy Policy at any time, and any changes will become effective immediately upon being posted unless we tell you otherwise.