

We at MediaBase Direct Limited ('MBD' and the Data Processor) respect the privacy of our visitors and Customers and are committed to preserving your online safety by preserving your privacy at any time you visit or communicate with our site.

Our Terms of Use and Privacy Policy sets out the data processing practices carried out through the use of internet and other electronic devices by the Company.

This Privacy Policy is reviewed annually, and we recommend that you therefore regularly review this Policy. The version was last updated on 1<sup>st</sup> July 2020.

All personal data captured will be processed and held in accordance with the requirements of the General Data Protection Regulation ('GDPR'). MBD is registered under the Data Protection Act with registration number Z7133579.

The Data Processor is Anil Jain who can be contacted at [info@mediabasedirect.com](mailto:info@mediabasedirect.com).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights contact the DPO Anil Jain at [info@mediabasedirect.com](mailto:info@mediabasedirect.com).

**1. Definitions:**

- 1.1. **Automated Processing** shall mean any form of automated processing of Personal Data to evaluate aspects relating to an individual and analyse or predict aspects of individuals.
- 1.2. **Personal Data** shall mean any information relating to an identified or Identifiable Natural Person. Personal Data includes special categories of Personal Data and pseudonymised Personal Data but evades anonymous data, or data that has had the identity of an individual permanently removed.
- 1.3. **Pseudonymised Data:** Shall mean replacing information that directly or indirectly identifies an individual with one or more artificial identifiers or pseudonyms so that the person to whom the data relates cannot be identified without the use of additional information.
- 1.4. **Identifiable Natural Person** shall mean a person who can be identified, directly or indirectly by reference to an identifier such as a name, identification number, location data, online identifier, one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural persons.
- 1.5. **Special Categories of Personal Data** shall mean Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, processing of genetic data, biometric data for the purpose of identifying an Identifiable Natural Person, data concerning health, sex life, sexual orientation.
- 1.6. **Data** shall mean "means information of any kind, however represented whether comprising words, database entries, numbers, graphs, maps, pictures, sketches or otherwise in any other form and on any media
- 1.7. **Processing** shall mean any operation or set of operations which is performed on Personal Data or on sets of Personal Data whether or not by automated means such as collection, recording, organization, structuring, storage, adaption, alteration, retrieval, consultation, use, disclosure by transmission, dissemination, restriction, erasure or destruction.
- 1.8. **Profiling** shall mean any form of automated processing of Personal Data consisting of the use of Personal Data to evaluate certain personal aspects relating to a natural person, in particular to analyses or predict aspects concerning the natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements
- 1.9. **App** shall mean any computer and mobile based application
- 1.10. **Website** shall mean an internet website for MBD
- 1.11. **MBD** shall mean Media Base Direct Limited (company number 2651463) whose registered office is at TML House, The Anchorage, Gosport, Hampshire PO12 1LY. MBD also trades under a number of Trading Styles.
- 1.12. **Trading Style** is when MBD trades under any name other than MediaBase Direct Limited. MBD also trades as 'LEADR', 'Refinemydata', 'CUSTR', 'e-Reception Book', 'Mailroom', 'Inventory' and 'bookmysunbed'.

**2. Data**

MBD may collect and process Data and Personal Data from you, either automatically or manually during the operations of our Websites, Apps, forms you may fill out (including part completed forms)

**2.1. Manually requested Data and Personal Data Collected from You**

**2.1.1.** MBD may request the following manual information direct from you:

- 1. Identity data such as first name, maiden name, last name, marital status, title, date of birth and gender
- 2. Contact data such as billing address, delivery address, email address and telephone number.
- 3. Financial data such as bank account and payment card details.

4. Personal descriptions
  5. Details about the nature of your enquiry.
  6. Photographs (only if required in order for MBD to provide the service)
  7. Transaction data including details about payments to and from you and other details of products /services purchased from us.
  8. Technical data including IP address, login data, browser type and version, time zone setting and location, browser plug in types, operating system and platforms and other devices used to access the company or any Trading Style Websites.
  9. Profile data including username, password, feedback and survey responses.
  10. Usage data including how you use our website products and services.
  11. Marketing and communications data.
- 2.1.2. Personal Data is collected on any forms (including part completed forms) you may fill out on our Website or Apps.
- 2.1.3. If for any reason you communicate with our personnel, MBD may collect information as listed above.
- 2.1.4. You may give the MBD any Data and Personal Data by submitting any information (as listed above) or Data Upload onto any App, Website, Company server or other device owned by the Company. The Data may include information you provide when you report a problem with any App, Website or other device owned by the Company.

**Data and Personal Data which may be Automatically collected:**

- 2.2. Information about your visit to any App, Website or other device collected through the use of Cookies, Web server logs, including (but not limited to) IP address, the full Uniform Resource Locators (URL) clickstream to through and from our site (including date and time); products you viewed or searched for; page response times, download information errors, length 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 service number. Such information is necessary to enable the function of the Live Chat feature offered to any person visiting MBD's Websites, Apps or other devices.
- 2.3. Technical Data
- 2.4. Profile Data
- 2.5. Usage Data
- 2.6. We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Such data does not directly or indirectly reveal your identity.
- 2.7. Where we need to collect personal data by law or under the terms of the contract with you and you fail to provide data when requested we may not be able to perform the contract we have or trying to enter into with you. In this case we may have to cancel a product or service you have with us.

The Company may receive information about you if you use any of the other Websites operated or the other services MBD provide.

The information and Personal Data collected is limited to what is necessary for MBD to provide a service to you.

The information MBD hold will be accurate and kept up to date (where necessary) however MBD are not responsible if you have inputted incorrect Data but you will have the right of rectification of inaccurate Personal Data.

MBD will not collect Special Categories of Personal Data.

**3. Cookie Usage**

There are instances where we may use cookies to gather information regarding our services in a mathematical collection for our website and our advertisers.

Any information collected will not have any identifying data. It is statistical data about our visitors and how they have used our site. No Personal Data will be shared that could identify you.

We may assemble information about your common internet use with a cookie file. When used, the cookies are downloaded to your computer automatically. The cookie is stored on the hard drive, with transferred information. The data sought by the cookie helps us improve our website and any service offered to you.

We use cookies to identify you when you visit any website of MBD and any of its Trading Styles and to keep track of your browsing patterns.

Your browser has the ability to decline cookies. This is done by setting your browser options to decline all cookies.

Our advertisers may download cookies to which we have no control. If used, these cookies are downloaded by clicking on an advertisement found on our website

**Cookies we use:**

Site	Cookies	Description
<a href="https://www.mediabasedirect.com/">https://www.mediabasedirect.com/</a>	svSession	This cookie is essential for the CMS system to recognise you in the system once you have logged in.
<a href="https://refinemydata.mediabasedirect.com/">https://refinemydata.mediabasedirect.com/</a>	__utma	This cookie is essential for the CMS system to recognise you in the system once you have logged in.
<a href="https://dashboard.bookmysunbed.com/">https://dashboard.bookmysunbed.com/</a>	X-Auth-Token	This cookie is essential for the CMS system to recognise you in the system once you have logged in.
<a href="https://dashboard.bookmysunbed.com/">https://dashboard.bookmysunbed.com/</a>	laravel_session	This cookie is essential for the CMS system to recognise you in the system once you have logged in.
<a href="https://reception.mediabasedirect.com">https://reception.mediabasedirect.com</a>	laravel_session	This cookie is essential for the CMS system to recognise you in the system once you have logged in.
<a href="https://reception.mediabasedirect.com">https://reception.mediabasedirect.com</a>	__lc.visitor_id.8012441	This cookie is essential for the online chat to recognise you in the system once you have logged in.
<a href="http://leadr.mediabasedirect.com">http://leadr.mediabasedirect.com</a>	__datacapturev2_session	This cookie is essential for the CMS system to recognise you in the system once you have logged in.
	__livechat	This cookie is essential as it remembers the info of the visitor entering your website.
<a href="https://refinemydata.mediabasedirect.com/">https://refinemydata.mediabasedirect.com/</a>	__livechat_lastvisit	This cookie is essential as checks visitor's last visit.
<a href="https://dashboard.bookmysunbed.com/">https://dashboard.bookmysunbed.com/</a>	common_iwcs_0	This cookie is essential as it synchronises the communication between opened chat tabs.
	incap_ses_	This cookie is essential as it provides DDoS LiveChat protection
	notification[new_messages]	This cookie is essential as it informs about the pending LiveChat messages.
	message_text	This cookie is essential as it keeps text that is written in textbox.
	SERVERID_L	This cookie is essential as it is used by LiveChat's load balancer.
	amplitude	This cookie is essential as it provides web and mobile analytics for LiveChat.
<a href="https://refinemydata.mediabasedirect.com/">https://refinemydata.mediabasedirect.com/</a>	__adroll	This cookie is essential to be able to use AdRoll's retargeting platform.

**4. Data Use- Why :**

- 4.1. The Personal Data collected is used for a specified purpose and is necessary for the performance of our Services, a legitimate interest pursued by MBD or to comply with a legal obligation to which MBD is subject.
- 4.2. We have set out below on table format, a description of some of the ways we plan to use your personal data and the legal basis we rely on to do so.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

- 4.3. Please note that your Personal Data may be used to send you details of the products and or services we offer and have identified as likely to be of interest to you. We will not do so without first obtaining your Consent. You will be provided with the Opt-In statement before MBD collects any information. If at any point you would like to opt out of receiving communications from us please contact [info@mediabasedirect.com](mailto:info@mediabasedirect.com).
- 4.4. You are able to withdraw your Consent at any time.
- 4.5. From time to time we would like to send you offers from selected third party companies that offer goods and services that we feel would be of interest to you. You may at any time withdraw your consent by contacting [info@mediabase.com](mailto:info@mediabase.com)

**5. Personal Data Storage**

- 5.1. Personal Data will be stored on secure servers. Transaction data is encrypted for your safety.
- 5.2. You should understand Data via online transmission is not completely secure. We cannot guarantee full protection and security, only that we take all reasonable action to protect information sent to us electronically. Transmission of any data by you is at your own risk. Where applicable you may be given access to sections of our site that require a password. You are responsible for the passwords safety and confidentiality.
- 5.3. MBD will only retain your Personal Data for as long as necessary to fulfill the purpose we collected it for including for the purposes of satisfying any legal, accounting or reporting requirements
- 5.4. To determine the appropriate retention period for Personal Data we consider the amount, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your personal data and whether we can achieve those purposes through other means.
- 5.5. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

**6. Disclosing Customer Data:**

- 6.1. MBD may share your Personal Data with any member of the company, service provider or other entities in the group.
- 6.2. MBD will not transfer your Personal Data to third parties unless the following circumstances apply:
  - a. In the event that MBD sell or buy any business or assets, in which case the MBD may disclose your Personal Data and any other information to the prospective seller or buyer of such business or assets.
  - b. If MBD or substantially all of its assets are acquired by a third party, in which case Personal Data, and any other information held by it about its customers will be one of the transferred assets.
  - c. If MBD is under a duty to disclose or share your Personal Data or other information in order to comply with any legal obligation, and other agreements; or to protect the rights, property, or safety the company, their customers, App Users or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- 6.3. We may disclose your Personal Data to third parties with your consent.
- 6.4. We shall share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

We require third parties to respect the security of your data and to treat it in accordance with the law

**7. Third Party Links**

Third party links may be discovered on our site. These third-party links have their own privacy policy, which you agree to when you click on the link. We are not responsible, nor do we accept responsibility for third party links. Our liability covers us only on our site, and thus we do not accept liability for third party links as we have no control over them.

**8. Profiling**

MBD will not process your Personal Data by Profiling.

**9. Your Rights**

**9.1. Information Accessibility:**

- 9.1.1. You have a right to see your Personal Data unless providing a copy adversely affects the rights and freedoms of others. If you request additional copies of Data a reasonable fee may be charged.
- 9.1.2. The Data Processor must respond within one month. This may be extended by a further two months if the request is complex or there are numerous requests and the Data Processor will inform you of such a delay.
- 9.1.3. You have a right to obtain info about the Data Processor processing including:
  - a. The purpose of data processing

- b. Categories of data processing
- c. Recipients of the data
- d. How long the data is stored.
- e. The source of the Personal Data if it has not come from you.

**9.2. Right to Rectification:**

- 1. You have the right to rectification of any inaccurate Personal Data.
- 2. You have the right to request incomplete information is completed.

**9.3. Right to Erasure:**

- 1. You have a right for MBD to erase your Personal Data in the following circumstances:
  - a. the Personal Data is no longer required for the purpose in which they were requested.
  - b. You withdraw your Consent.
  - c. You object to the processing of your Personal Data
- 2. MDB may refuse to act on the request if continued retention of the Personal Data is necessary for:
  - a. Exercising the right of freedom and expression.
  - b. Complying with a legal obligation
  - c. Performance of a task carried out in public interest.
  - d. Establishment exercise or defense of legal claims.
  - e. Exercising official authority vested in Data Processor
  - f. Public health reasons consistent with the exceptions for processing Personal Data such as health information.

**9.4. Right to Restrictions of Processing**

9.4.1. You have the right to restrict the processing of your Personal Data under certain circumstances:

- a. If you contest to the accuracy of the data the Data Processor must restrict the processing until it can verify its accuracy.
- b. The processing is unlawful
- c. The Data Processor no longer needs to process the data and the Data Subject needs the data for establishment, exercise or defense of legal claims.
- d. Where you object to processing that relies on public interest or a third party's legitimate interest the Data Processor must restrict processing until it can verify whether the third party's or Data Processor's legitimate interest overrides your interest.

9.4.2. Where you exercise the right of restriction the company can continue to store the Personal Data but will only process it:

- a. With your consent
- b. To establish, exercise or defend legal claims
- c. To protect the rights of another individual or legal entity
- d. For important public interest reasons

**9.5. You can object to Data Processing under certain circumstances, including:**

- a. For direct marketing purposes
- b. For scientific, or historical research or statistical purposes
- c. Profiling in order to perform a task in the public interest or the Data Processor or Third Party's legitimate interests unless the Data Processor demonstrates a compelling legitimate ground for processing the Personal Data that overrides your interest or if the Data Processor needs to process the data to establish exercise or defend legal claims.

**9.6. Data Portability**

9.6.1. You have the right to:

- a. Receive a copy of the Personal Data in a commonly used & readable format
- b. Transmit the Personal Data to another Data Processor
- c. Have the personal data transmitted directly from one Data Processor to another where technically possible.

9.6.2. You can only exercise this right if:

- a. The personal data relates to you and can clearly be linked to you
- b. The personal data was provided to the Data Processor by you

9.6.3. The Data Processor can refuse or restrict this right if data portability will adversely affect the rights of third parties.

**9.7. Automated Decision-Making Objection Rights**

9.7.1. You have a right to not be subject to automated decision-making including profiling unless the automated decision is necessary for exercising or performing a contract with you or if you have provided consent.

**10. Contacting Us**

Please feel free to contact us with queries, requests, or comments you may have about our Privacy Policy. We welcome any communication via the email address supplied here: [info@mediabasedirect.com](mailto:info@mediabasedirect.com)

**11. How to exercise your rights:**

11.1. If you wish to exercise any of the rights outline in Clause 9 of this policy please contact the Data Processor at [info@mediabasedirect.com](mailto:info@mediabasedirect.com)

**12. Disputes**

12.1. You have the right to make a complaint at any time to the Information Commissions Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Effective: **1 December 2020**