

## **1854 Media Ltd Privacy Policy**

1854 Media will not share any data with anyone else unless it's explicitly been communicated with the customer/registrant at the time of collecting data and they have expressly consented to their data being used for a specific purpose.

1854 Media Limited is committed to protecting and respecting your privacy. This policy together with our terms of use and any other documents referred to sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. For the purpose of the Data Protection Act 1998 ("the Act"), the data controller is 1854 Media Limited, Anchorage House, 2 Clove Crescent, London E14 2BE. As a data controller we have registered with the Information Commissioner's Office and our registration number is ZA359288

We are committed to safeguarding your privacy. We appreciate that you do not want any personal information you provide to us distributed arbitrarily and here we explain how we collect information, what we do with it and what controls you have. This privacy policy may change from time to time so please check back here frequently. We reserve the right to amend, modify or withdraw the terms of this policy.

### **1. What personal information do we collect from you?**

- i. What is personal information? Personal information is any information that allows someone to identify you, including, for example, your name, address, telephone and mobile numbers, email address, as well as any information about you that is associated with or linked to, or could be linked to, any of the foregoing data.
- ii. Your personal information is collected when you register or fill in a form on a Website, contact 1854 Media, or complete a form in any of our publications or services which may relate, for example, to subscriptions, competitions, offers and promotions and personal information you provide in online surveys and forums on a voluntary basis. This includes information you provide when you register to use our Website, subscribe to newsletters, place an order or participate in discussion boards on our Website. The information you give us may include your name, address, email, phone number and payment details.
- iii. Personal information that is provided by you will only be used for the purpose for which it is provided, unless you are informed otherwise at the time of giving the information.
- iv. 1854 Media will from time to time collect information from you for the purpose of creating de-personalised data that does not reveal your identity. 1854 Media uses this information to improve our products and occasionally for other internal purposes. This information is only used in de-personalised form and is not connected to any name, address or other personal identifying information.

### **2. How is your information processed, stored and kept secure?**

- i. Your personal information may be processed both in and outside the UK. When you submit your details in whichever country you are situated you agree to the information being processed in the UK.
- ii. We may also process or transfer your personal information outside the UK (and possibly to places outside the European Economic Area, which is all EU member states plus Norway, Iceland and Liechtenstein). 1854 Media shall take reasonable steps to ensure that any transfer of your personal information to a country or territory outside the European Economic Area, whose laws may provide for a lesser standard of protection for your

personal information than that provided under European law, shall have adequate protection (such as model contractual arrangements as approved by the EU).

- iii. The Websites and our servers, wherever they are based, have appropriate technical and organisational measures in place to protect against unauthorised or unlawful use of your personal information as well as the accidental loss, destruction or damage of your personal information whilst under our control.
- iv. However no data transmission over the internet can be guaranteed to be 100% secure and whilst we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us and you do so at your own risk.

### **3. How do we use your personal information?**

1854 Media processes personal information for the following purposes:

- providing you with goods and/or services that you have requested and communicating with you about those products and services;
  - monitoring, developing and improving the Websites, our services and your experience;
  - providing a personalised service;
  - conducting market research surveys;
  - market research, community and forums management;
  - running competitions;
  - providing you with information about 1854 Media, or our business partners' products and services where you have provided your consent. You will always be able to opt-out or unsubscribe from these messages;
  - send out email alerts you have agreed and consented to receive. You will always be able to unsubscribe from these messages;
  - processing and dealing with any complaints or enquiries made by you or legally on your behalf;
  - we may also be required to disclose your personal information to authorities who can request this information by law that is binding on 1854 Media, for instance for the prevention and detection of crime, the capture or prosecution of offenders and the assessment or collection of taxes; and
  - other purposes related to any of the above.
- i. 1854 Media may also contact you about your registration details, to manage any account or subscription you have with us, or to provide customer service, even if you have opted-out of or declined to consent to receiving promotional emails. We may also contact you if we consider that revisions to this privacy policy are sufficiently important to notify you about them.

### **4. Do we share your personal information with anyone else?**

- i. 1854 Media will not share any data with anyone else unless it's explicitly been communicated with the customer/registrant at the time of collecting data.
- ii. In the rare event where the sharing of data is applicable, we may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.
- iii. We may disclose your personal information to partners of 1854 Media who supply services to you on behalf of 1854 Media and who need to process personal information in the

provision of such services. When you request goods and services from 1854 Media, you are consenting to the disclosure of your personal information to 1854 Media's partners who may provide such goods and services under contract and guarantee to our satisfaction that they have sufficiently robust processes in place to ensure the security of your personal information whilst it is in their care.

- iv. We may disclose your personal information to third parties:
  - In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
  - If all or substantially all of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets.
- v. We may disclose depersonalised data (such as aggregated statistics) about the users of our Websites in order to describe our sales, customers, traffic patterns and other site information to prospective partners, advertisers, investors and other reputable third parties and for other lawful purposes, but these statistics will include no personally identifying information.
- vi. Under certain circumstances we may occasionally be required by law, court order or governmental authority to disclose certain types of personal information and we reserve the right to comply with any such legally binding request. Examples of the type of situation where this would occur would be:
  - in the administration of justice;
  - where we have to defend ourselves legally;
  - in complying with the mandatory requirements of a government department collecting information; and
  - to protect or defend the rights or property of 1854 Media Ltd or users of our services.
- vii. Other than this, 1854 Media will not disclose any of your personal information to any other third parties without your consent.

## **5. Are there any age restrictions on supplying personal information to us?**

If you are aged [16] or under, please get your parent/guardian's permission beforehand whenever you provide personal information to the Websites. Users without this consent are not allowed to provide us with personal information. If we become aware that you are under [16] and are attempting to or have submitted personal information via the Websites without your parent/guardian's permission, we will not accept such information and we will take steps to remove such information from our records. This may involve us having to access and verify your age and other relevant details.

## **6. How long will we keep your personal information?**

We will hold your personal information on our systems only for as long as is in our opinion reasonably necessary and in accordance with applicable law.

## **7. Changing your mind about receiving marketing messages.**

We give you choices regarding the collection, use, and sharing of your personal information. When you register on one of our sites or respond to one of our communications or offers, we will ask you to make choices about receiving further marketing communications from us. Should you wish to stop receiving marketing communications from us, you will be able to unsubscribe or opt-out, or you can

contact us and we will make the changes for you. Our contact details are at the end of this privacy policy. Please remember to quote any important information such as your account or order number for instance, include your full name, email and postal address so that we may make the changes that you request.

## 8. How do we use cookies?

### 1854 Media Cookies

- i. "Cookies" are pieces of information that a website transfers to your hard drive to store and sometimes track information about you. Cookies are common and won't do anything to harm your system - they simply store or gather information. They help you to get the most out of your visit to our Websites.
- ii. We may collect information about your computer including, where available, your IP address, operating system and browser type for system administration as part of our audit trail process. Most web browsers automatically accept cookies, but if you prefer, you can change your browser to prevent that. You are not obliged to accept cookies and you can adjust your browser's setting to prevent it from accepting cookies on your computer - go to [www.allaboutcookies.org](http://www.allaboutcookies.org) for instructions on how to disable cookies. However, you may not be able to take full advantage of our Websites if you do so.
- iii. Cookies are specific to the server that created them and cannot be accessed by other servers, which means they cannot be used to track your movements around the web. Although they can be used to store information which may identify a user's computer, cookies do not personally identify users and passwords and credit card information are not stored in cookies.
- iv. Our Websites use two main types of cookies:
  - Per-session cookies. We only use these whilst you are visiting our website and they are deleted when you leave. They remember you as you move between pages, for example recording the items you add to an online shopping basket. They also help maintain security.
  - Persistent cookies. These cookies stay on your computer until they expire or are deleted. We set automatic deletion dates so that we don't keep your information for longer than we need to.
- v. Our Websites also use cookies, for example, to:
  - Gather customer journey information across our sites and fulfil any of your requests;
  - Gain insight into the nature of our audience so we can tailor our content accordingly;
  - Ensure your privacy when you visit our secure sites;
  - Store login details for our secure sites;
  - Store details of your marketing preferences to improve and enhance your visit to our sites;
  - Evaluate our sites' advertising and promotional effectiveness - all information is anonymised and we don't share it with anyone;
  - Provide advertising on our sites and on other sites which are tailored to your interests and preferences;
  - Remember settings you have applied to a Website such as layout, font size, preferences, colours etc;
  - Detect if a service has already been offered to you so that we don't ask you again.

Cookie	Domain	Description
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Analytics cookies (__utm, __utma, __utmb, __utmc, __utmz, _ga, _gid, _gat)	1854 Media Websites	<p>1854 Media uses Google Analytics, which sets a first-party cookie in order to anonymously identify when users return to specific websites.</p> <p>Google uses the information sent with this cookie to store a history of website pages visited in a user's session. This data will not be used to associate any part of your identity, anonymous or not, with any other data held by Google.</p> <p>Further information about how to opt-out of this cookie can be found at <a href="https://www.google.com/intl/en/policies/privacy/partners/">https://www.google.com/intl/en/policies/privacy/partners/</a></p>
Advertisement cookies	Any	<p>From time to time, advertisers may include digital assets which set cookies on an advertiser's domain or on the domain of our Website. These cookies will only store anonymous information about your interaction with a specific advert and will not be used to personally identify you.</p> <p>We may also share anonymised behavioural data with advertising partners, to improve the quality and relevance of our advertising. This means that when you are on other websites, you might be shown advertising based on your behaviour on our Website. We may also show you advertising on our site based on your behaviour on other sites.</p> <p>You may find out more information, including how to opt-out of these cookies being set in your browser by visiting <a href="http://www.youronlinechoices.com/uk/your-ad-choices">http://www.youronlinechoices.com/uk/your-ad-choices</a></p>
Google Advertising cookies	google.com, doubleclick.net, invitemediamedia.com, admeld.com, googlesyndication.com, or googleadservices.com	<p>1854 Media uses Google Double Click to serve advertisements. Advertisements are received from Google Double Click servers to your browser along with a cookie to anonymously identify you as you visit websites which serve advertising from Google Double Click servers.</p> <p>In addition to providing website usage data as described above, Google Analytics may also collect anonymous demographic data such as age, gender and interests by placing a Google DoubleClick cookie in your browser. This data is aggregated and anonymised and helps us understand the types of users who visit our site. This cookie may also help us serve advertising tailored to your interests and preferences when you visit our sites or other sites that we advertise on.</p> <p>More information about this cookie, including how to opt-out of receiving the cookie can be found at <a href="http://www.google.com/settings/ads/onweb/">http://www.google.com/settings/ads/onweb/</a></p> <p>If you opt out of this cookie, you will still see advertising when you visit our sites, but the content of the ads may not be as relevant to you.</p>
Facebook Pixel	facebook.com and other domains used by the Facebook family of companies, including the atdmt.com, liverail.com and instagram.com domains	<p>1854 Media uses Facebook technologies such as the Facebook Pixel to show you interest-based marketing content from our brands and selected advertisers if you have viewed an 1854 Media website. Data collected by the Facebook Pixel may also be anonymised and used in aggregate to help improve the quality and effectiveness of our websites and marketing efforts.</p> <p>You can find out more about Facebook Advertising and manage your Facebook Advertising settings or opt-out of Facebook interest-based advertising at <a href="https://www.facebook.com/ads/about/">https://www.facebook.com/ads/about/</a></p>
Facebook Like Button cookies	facebook.com	<p>When you create or log in to an account on <a href="http://www.facebook.com">http://www.facebook.com</a> cookies are stored on your computer in order to remain logged-in to your Facebook account when visiting <a href="http://www.facebook.com">http://www.facebook.com</a> again.</p> <p>The Facebook Like Button used on our Website is hosted by Facebook and your browser therefore sends this cookie data to Facebook when creating the button inside your browser. This data is used by Facebook in order to associate the Facebook Like Button with your Facebook account. This information is not accessible to us, and is not sent to us by Facebook.</p> <p>More information about this cookie and Facebook's Privacy Policy can be found at <a href="https://www.facebook.com/about/privacy/your-info-on-other#socialplugin">https://www.facebook.com/about/privacy/your-info-on-other#socialplugin</a></p>
Twitter Share Button	twitter.com	<p>When you create or log in to an account on <a href="http://www.twitter.com">http://www.twitter.com</a> cookies are stored on your computer in order to remain logged-in to your twitter account when visiting <a href="http://www.twitter.com">http://www.twitter.com</a> again. The Twitter Share Button used on our Website is hosted by <a href="http://www.twitter.com">http://www.twitter.com</a> and your browser therefore sends this cookie data to Twitter when creating the button inside your browser. This data is used by Twitter in order to associate the Twitter Share Button with your Twitter account. This data is not accessible to us, and is not sent to us by Twitter.</p>

		More information about this cookie and Twitter's Privacy Policy can be found at <a href="https://twitter.com/privacy">https://twitter.com/privacy</a>
Twitter Pixel	twitter.com and other domains used by the Twitter family of companies	1854 Media uses Twitter technologies such as the Twitter Pixel to show you interest-based marketing content from our brands and selected advertisers if you have viewed an 1854 Media website. Data collected by the Twitter Pixel may also be anonymised and used in aggregate to help improve the quality and effectiveness of our websites and marketing efforts.
LinkedIn Pixel	linkedin.com and other domains used by the LinkedIn family of companies	1854 Media uses LinkedIn technologies such as the LinkedIn Pixel to show you interest-based marketing content from our brands and selected advertisers if you have viewed an 1854 Media website. Data collected by the LinkedIn Pixel may also be anonymised and used in aggregate to help improve the quality and effectiveness of our websites and marketing efforts.
Pathfinder Cookies	1854 Media Websites	1854 Media uses PathFinder Cookies, which sets a first-party cookie in order to anonymously identify when users return to specific websites.  PathFinder uses the information sent with this cookie to store a history of website pages visited in a user's session, to help target customers with relevant ads/services and or emails. This data will not be used to associate any part of your identity, anonymous or not, with any other data held by Pathfinder.

## 9. Social Media.

- i. Social networking sites, such as Facebook, among others, work with us as trusted third party partners. We also work with application developers who specialise in social media, so that we can connect with your social networks. We provide access to our Websites for third parties and business partners so that we can generate interest in our products and services among members of your social networks and to allow you to share product and service interests with friends in your network.
- ii. We do not control how your personal information is collected, stored or used by such third party sites or to whom it is disclosed. You should review the privacy policies and settings on any social networking site that you subscribe to so that you understand the information they may be sharing. If you do not want your networking sites to share information about you, you must contact that site and determine whether it gives you the opportunity to opt-out of sharing such information. 1854 Media is not responsible for how these third party sites may use information collected from or about you.

## 10. Other websites.

- i. This privacy policy applies only to our Websites. There may be links on these Websites to third party websites over which 1854 Media has no control and when you click on advertisements or links you will leave our Websites and go to another site and thereafter it is that third party's site whose privacy policy will apply.
- ii. 1854 Media accepts no responsibility or liability for any third party practices on third party websites. 1854 Media advises you to carefully read third party privacy statements prior to the use of any third party website.

## 11. Access to personal information and keeping your personal information accurate and up-to-date.

- i. You are entitled to see the information we hold about you. If you wish to access the personal information held by us, you should contact us in writing using the information provided below.

- ii. If we are legally able, we will provide you with copies of all the personal information we hold about you, on payment of a nominal administration charge of £10. We are also obliged to request that you provide us with identification so that we can be certain that you are entitled to receive the requested data.
- iii. Please help us to keep our records of your personal information up-to-date by notifying us of any changes or corrections to the personal information we hold about you.
- iv. If you are a member of one of our online website, for instance a subscriber or BJP shop customer, you will be able to directly log in and review some your personal information and amend/delete accordingly.

## **12. How to contact us.**

If you do not understand or accept this privacy policy or wish to contact us concerning any matter relating to your personal information then please email [privacy@1854.media](mailto:privacy@1854.media)