

FCG Worldwide Limited

EXTERNAL PRIVACY NOTICE

Last Updated 16 May 2018

We respect the privacy of every person who visits or registers with www.fourcommunications.com (the "**Website**") and we are further committed to ensuring a safe online experience. We also respect the privacy of every person who uses the products and services that we make available from the Website or who engages with us to use the products or services that Four provides (be it through the Website or not) (our "**Services**") or whose personal information we may process as a result of providing the Services to others or who applies to work at Four.

1 Purpose of this Policy

This privacy notice ("**Privacy Notice**") explains our approach to any personal information that we might collect from you or which we have obtained about you from a third party and the purposes for which we process your personal information. This Privacy Notice also sets out your rights in respect of our processing of your personal information.

This Privacy Notice will inform you of the nature of the personal information about you that is processed by us and how you can request that we delete, update, transfer and/or provide you with access to it.

This Privacy Notice is intended to assist you in making informed decisions when using the Website and our Services and/or to understand how your personal information may be processed by us as a result of providing the Services to others or when you apply to work at Four. Please take a moment to read and understand it.

Please also note that this Privacy Notice only applies to the use of your personal information obtained by us, it does not apply to your personal information collected during your communications with third parties.

2 Who are we and what do we do?

The Website and our Services are operated by Four Communications Group Limited and group companies, (“we”, “us”, “our”, or “Four”).

Four Communications Group Limited is the principal data controller responsible for your personal information processed via the Website, and is registered with the ICO under number Z3111083. Four Communications Group Limited is a UK company registered in England with registered company number 05114815 and whose registered office is at 20 St Thomas Street, London, SE1 9BF.

Group companies include the following parent and subsidiary companies, all of whom are also UK companies except where indicated, and they may also be data controllers responsible for your personal information processed in relation to the Services:

- FCG Worldwide Limited,
- Four Communications Limited,
- Four Marketing & Media Limited,
- Four Communications Group FZ-LLC (registered in Abu Dhabi, UAE),
- Four Colman Getty Limited,
- Consolidated PR Limited,
- Four MSA Limited (trading as Four Health Media),
- Four Broadgate Mainland Limited (trading as Four Broadgate),
- Four Cymru FBA Limited (trading as Four Cymru),
- Four Health Communications Limited,
- Four Rain Limited (trading as Four Brand), and
- Legend Engage Limited (trading as Four Engage).

3 How to contact us?

If you have any questions about this Privacy Notice or want to exercise your rights set out in this Privacy Notice, please contact us by:

- sending an e-mail to dataprotection@fourcommunications.com; or
- calling us on: +44 20 3697 4200.

4 What personal information do we collect and how do we use it?

Our primary goal in collecting personal information from you may be to:

- verify your identity;
- help us deliver our Services;
- improve, develop and market new Services;
- carry out requests made by you on the Website or in relation to our Services;
- investigate or settle inquiries or disputes;
- comply with any applicable law, court order, other judicial process, or the requirements of a regulator;
- enforce our agreements with you;
- protect the rights, property or safety of us or third parties, including our other clients and users of the Website or our Services;
- provide support for the provision of our Services;
- recruitment purposes;
- and use as otherwise required or permitted by law.

To undertake these goals we may process the following personal information:

If you are a **visitor** to the Website and provide information via a contact form:

- Name and job title.
- Contact information including email address.
- Demographic information such as postcode, preferences and interests.
- Other information relevant to provision of Services.

If you are a **potential recruit** to a Four office:

- Name and job title.
- Contact information including email address.
- Curriculum vitae, your education, employment history and similar matters and similar information that you may provide to us.
- Other information relevant to potential recruitment to Four.

If you are an **individual client** in receipt of our Services or **prospective individual client**:

- Name and job title.
- Contact information including email address.
- Payment information.
- Other information relevant to provision of Services.
- Information that you provide to us as part of our providing the Services to you which depends on the nature of your agreement with Four.
- Relevant information as required by regulatory Know Your Client and or Anti Money Laundering regulations. This may possibly include evidence of source of funds, at the outset of and possibly from time to time throughout our relationship with clients, which we may request and/or obtain from third party sources. The sources for such verification may comprise documentation which we request from the prospective client or through the use of online sources or both.



Primarily Four is engaged by **corporate clients** (i.e. other corporate entities) and as such those clients are not data subjects. However as part of such instructions personal information about other persons may be provided to us (e.g. personal information relating, without limitation, to any of our corporate clients' or prospective clients' workers).

If you are an **individual whose personal information may be processed by us as a result of us providing the Services to others** (including individual clients and corporate clients) we will process a variety of different personal information depending on the Services provided.

For instance, if we are providing services to a corporate client for the benefit of their customers we may be provided with, and then process, personal information about those customers including but not limited to the customer's name and contact details. In some cases we may also be joint controllers with a corporate client, and jointly decide how data is processed in those cases. In those cases, only decisions made by Four are governed by this privacy notice.

We might also need to process personal information in relation to corporate clients' workers who use a Four product or service in the course of their work for our corporate client.

The following is a non-exhaustive list which is reflective of the varied nature of the personal information processed as part of our business.

We may use your personal information for the following purposes:

- **Fulfilment of Services.**

We collect and maintain personal information that you voluntarily submit to us during your use of the Website and/or our Services to enable us to perform the Services. Please note also that our Terms of Business also apply when we provide the Services.

Who do we share your personal information with for this purpose?

We may share personal information with a variety of the following categories of third parties as necessary when providing the Services:

- Fulfilment partners for communications, the production of materials, or the provider of additional services required from time to time
- Data processing and analytics providers that we use

Please note this list is non-exhaustive and there may be other examples where we need to share with other parties in order to provide the Services as effectively as we can.

What is our legal basis?

It is necessary for us to use your personal information to perform our obligations in accordance with any contract that we may have with you or it is in our legitimate interest or a third party's legitimate interest to use personal information in such a way to ensure that we provide the Services in the best way that we can.

- **Customer services.**

Our Site uses various user interfaces to allow you to request information about our Services: these include printed and electronic enquiry forms and a telephone enquiry service. Contact information may be requested in each case, together with details of other personal information that is relevant to your Service enquiry. This information is used in order to enable us to respond to your requests.

Who do we share your personal information with for this purpose?

We do not share your personal information for this purpose.

What is our legal basis?

It is in our legitimate interest or a third party's legitimate interest to use your personal information in such a way to ensure that we provide the very best client service we can to you or others.

- **Your feedback about our Services.**

From time to time we will contact you to invite you to provide feedback about our Services in the form of online or postal communication(s). We use this information to help us improve the quality of service provided by our staff. We also use your feedback to monitor the quality of our Services.

Who do we share your personal information with for these purposes?

We use a third party service provider to assist us with client surveys and feedback requests.

What is our legal basis?

It is in our legitimate business interests to use the information you provide to us in your feedback for the purposes described above.

- **Business administration and legal compliance.**

We use your personal information for the following business administration and legal compliance purposes:

- to comply with our legal obligations (including Know Your Client, Anti-Money Laundering or Anti-Bribery or similar obligations including but without limitation maintaining regulatory insurance);
- to enforce our legal rights;
- protect rights of third parties; and
- in connection with a business transition such as a merger, acquisition by another company, or sale of all or a portion of our assets.

Who do we share your personal information with for these purposes?

We will share your personal information with professional advisers such as lawyers and accountants and/or governmental or regulatory authorities.

What is our legal basis?

Where we use your personal information in connection with a business transition, to enforce our legal rights, or to protect the rights of third parties it is in our or a third party's legitimate interest to do so. For all other purposes described in this

section, it is our legal obligation to use your personal information to comply with any legal obligations imposed upon us.

- **Recruitment.**

We use your personal information for the following recruitment purposes:

- To assess your suitability for any position for which you may apply at Four including partner level positions, associate positions, general positions, graduate recruitment schemes, apprenticeships, internships or work experience and also any business support or services role whether such application has been received by us online, via email or by hard copy or in person application.
- To review Four's equal opportunity profile in accordance with applicable legislation, and Four does not discriminate on the grounds of gender, race, ethnic origin, age, religion, sexual orientation, disability or any other basis covered by local legislation. All employment related decisions are made entirely on merit.

Who do we share your personal information with for these purposes?

We do not share your personal information that you provide to us directly.

You may have communicated with Four via a third party service (e.g. LinkedIn or Indeed) or via a third party (e.g. recruitment consultancies). In these instances, your personal information will be shared with Four by the third party, and you should consult their privacy policy and/or terms in relation to this.

What is our legal basis?

Where we use your personal information in connection with recruitment it will be in connection with us taking steps at your request to enter a contract we may have with you or it is in our legitimate interest to use personal information in such a way to ensure that we can make the best recruitment decisions for Four. We will not process any special data except where we are able to do so under applicable legislation or with your explicit consent.

- **Client insight and analysis.**

We analyse your contact details with other personal information that we observe about you from your interactions with our Site, our email communications to you and/or with our Services such as the Services you have viewed.

Where you have given your consent (where lawfully required), we use cookies, log files and other technologies to collect personal information from the computer hardware and software you use to access the Website, or from your mobile. This includes the following:

- an IP address to monitor Site traffic and volume;
- a session ID to track usage statistics on our Site;
- information regarding your personal or professional interests, demographics, buying habits, experiences with our products and contact preferences.

Our web pages and e-mails contain "cookies" "web beacons" or "pixel tags." ("**Tags**"). Tags allow us to track receipt of an e-mail to you, to count users that have visited a web page or opened an e-mail and collect other types of aggregate information. Once you click on an e-mail that contains a Tag, your contact information may subsequently be cross-referenced to the source e-mail and the relevant Tag. In some of our e-mail messages, we use a "click-through URL" linked to certain website administered by us or on our behalf.

Please see our Cookie Policy (access info in section 6 of this notice) for more information.

By using this information, we are able to measure the effectiveness of our content and how visitors use our Site and our Services. This allows us to learn what pages of our Site are most attractive to our visitors, which parts of our Site are the most interesting and what kind of offers our registered users like to see.

We also use this information for marketing purposes (see the marketing section below for further details).

Who do we share your personal information with for these purposes?

We share your personal information with a variety of third party service providers to assist us with client insight analytics. These providers include for example Google Analytics. Other providers are described in our Cookie Policy (access info in section 6 of this notice).

What is our legal basis?

Where your personal information is completely anonymised, we do not require a legal basis to use it as the information will no longer constitute personal information that is regulated under data protection laws. However, our collection and use of such anonymised personal information may be subject to other laws where your consent is required. Please see our Cookie Policy (access info in section 6 of this notice) for further details.

Where your personal information is not in an anonymous form, it is in our legitimate interest to use your personal information in such a way to ensure that we provide the very best products and services to you and our other clients.

- **Marketing communications.**

We carry out the following marketing activities using your personal information:

- **Postal marketing.**

- We use information that we observe about you from your interactions with our Site, our email communications to you and/or with Services (see the Client Insight and Analysis section above for more details of the information collected and how it is collected) and/or your address details, to send you marketing communications by post.

Who do we share your personal information with for these purposes?

We share your personal information with a variety of third party postal providers who assist us in delivering our postal marketing campaigns to you, including postal carriers.

What is our legal basis?

Where your personal information is completely anonymised, we do not require a legal basis to use it as the personal information will no longer constitute personal information that is regulated under data protection laws. However, our collection and use of such anonymised information may be subject to other laws where your consent is required.

Where your personal information is not in an anonymous form, such as your postal address, it is in our legitimate interest to use your personal information for postal marketing.

- **Email marketing.**

We use information that we observe about you from your interactions with our Site, our email communications to you and/or with our Services (see the Client Insight and Analysis section above for more details of the information collected and how it is collected) and/or your email address, to send you marketing communications by email, where you have consented to receive such marketing communications, or where we have another lawful basis to do so.

Who do we share your personal information with for these purposes?

We share your personal information with a variety of third party email marketing providers who assist us in delivering our email marketing campaigns to you.

What is our legal basis?

Where your personal information is completely anonymised, we do not require a legal basis to use it as the personal information will no longer constitute personal information that is regulated under data protection laws. However, our collection and use of such anonymised personal information may be subject to other laws where your consent is required.

Where your personal information is not in an anonymous form, it is in our legitimate interest to use your personal information for marketing purposes.

We will only send you marketing communications via email where you have consented to receive such marketing communications, or where we have a lawful right to do so.

- **Online personalised advertising.**

We use information that we observe about you from your interactions with our Site, our email communications to you and/or with Services (see the Client Insight and Analysis section above for more details of the information collected and how it is collected) to provide you with personalised online advertising.

Who do we share your personal information with for these purposes?

We share your personal information with a variety of third party service providers who assist us with our online personalised advertising campaigns. These providers are described in our Cookie Policy (access info in section 6 of this notice).

What is our legal basis?

Where your personal information is completely anonymised, we do not require a legal basis to use it as the personal information will no longer constitute personal information that is regulated under data protection laws. However, our collection and use of such anonymised personal information may be subject to other laws where your consent is required. Please see our Cookie Policy for further details; access info for this policy is in section 6 of this notice.

Where your personal information is not in an anonymous form, it is in our legitimate interest to use your personal information for marketing purposes.

- **Social media remarketing.**

We use information that we observe about you from your interactions with our Site, our email communications to you and/or with Services (see the Client Insight and Analysis section above for more details of the information collected and how it is collected) to provide you with personalised advertising on social media channels operated by Facebook, Instagram, Twitter, and/or Google where you are a registered user of such services.

We do this using Facebook Client Audiences, Instagram for Business, Twitter for Business, and/or Google Client Match respectively. Please note that such activity is also subject to the privacy choices you have elected to make on such services.

Who do we share your personal information with for these purposes?

We share your email address with third party service providers who assist us with social media remarketing campaigns.

Your encrypted email address is also shared by us or our third party service providers with Facebook, Instagram, Twitter, and/or Google under the terms of their respective services.

What is our legal basis?

Where your personal information is completely anonymised, we do not require a legal basis to use it as the personal information will no longer constitute personal information that is regulated under data protection laws. However, our collection and use of such anonymised personal information may be subject to other laws where your consent is required. Please see our Cookie Policy for further details; access info for this policy is in section 6 of this notice.

Where your personal information is not in an anonymous form, it is in our legitimate interest to use your personal information for marketing purposes.

We will only engage in social media remarketing where you have consented to us using your email address or sharing your email address in an encrypted format with Facebook, Instagram, Twitter, and/or Google respectively for marketing purposes.

- **Social media insight.**

Where you are a registered user of Facebook, Instagram, Twitter, or of a Google service, we will use your email address in an encrypted format to enable Facebook, Instagram, Twitter, and Google to find other registered users of their services that share similar interests to you based on:

- information that we observe about you from your interactions with our Site, our email communications to you and/or Services (see the Client Insight and Analysis section above for more details of the information collected and how it is collected); and
- the information Facebook, Instagram, Twitter, and/or Google hold about you.

We do this using Facebook Lookalike Audiences, Google Similar Audience, and other tools. Please note that such activity is subject to the privacy choices you have elected to make on such services.

Who do we share your personal information with for these purposes?

We share your email address with third party service providers who assist us with social media remarketing campaigns.

Your encrypted email address is also shared by us or our third party marketing consultancies with Facebook, Instagram, Twitter, and/or Google under the terms of their respective services.

What is our legal basis?

Where your personal information is completely anonymised, we do not require a legal basis to use it as the personal information will no longer constitute personal information that is regulated under data protection laws. However, our collection and use of such anonymised personal information may be subject to other laws where your consent is required. Please see our Cookie Policy for further details; access info for this policy is in section 6 of this notice.

Where your personal information is not in an anonymous form, it is in our legitimate interest to use your personal information for marketing purposes.

- Any other purposes for which we wish to use your personal information that are not listed above, or any other changes we propose to make to the existing purposes will be notified to you using your contact details.

5 How Do We Obtain Your Consent?

Where our use of your personal information requires your consent, you can provide such consent:

- at the time we collect your personal information following the instructions provided; or
- by informing us by e-mail, post or phone using the contact details set out in this Privacy Notice.

6 Our use of cookies and similar technologies

Our Site uses certain cookies, pixels, beacons, log files and other technologies of which you should be aware. Please see our Cookie Policy to find out more about the cookies we use and how to manage and delete cookies.

You can access our Cookie Policy by visiting www.fourcommunications.com/cookie-policy.

7 Third Party contractors and other controllers

As mentioned above, we may appoint sub-contractor data processors as required to deliver the Services, such as, without limitation, analytics tools and services, fulfilment providers, and providers of other services, who will process personal information on our behalf and at our direction. We conduct an appropriate level of due diligence and put in place necessary contractual documentation in relation to any sub-contractor to ensure that they process personal information appropriately and according to our legal and regulatory obligations.

Further, we may appoint external data controllers in common where necessary to deliver the Services (for example, but without limitation, Four entities). When doing so we will comply with our legal and regulatory obligations in relation to the personal information including but without limitation where necessary putting appropriate safeguards in place to ensure any personal information is processed according to our legal and regulatory obligations.

8 Extra-EEA Transfers

If you are based within the EEA, please note that where necessary to deliver the Services we may transfer personal information to countries outside the EEA (including to Four's US-based third-party contractors) and other Four entities via Four's Inter-Group Data Sharing Agreement which utilises model contracts as the extra-EEA transfer mechanism). When doing so we will comply with our legal and regulatory obligations in relation to the personal information including but without limitation having a lawful basis for transferring personal information and putting appropriate safeguards in place to ensure an adequate level of protection for the personal information.

9 How long do we keep your personal information for?

Regarding visitors to the Website, we will retain relevant personal information for at least three years from the date of our last interaction with you and in compliance with our obligations under the EU General Data Protection Regulation (or similar legislation around the world) (or for longer as we are required to do so according to our regulatory obligations or professional indemnity obligations).

Regarding personal information we have processed as part of providing the Services to any client, we will retain relevant personal information for at least six years from the date of our last interaction with that client and in compliance with our obligations under the EU General Data Protection Regulation (or similar legislation around the world) (or for longer as we are required to do so according to our regulatory obligations or professional indemnity obligations). We may then destroy such files without further notice or liability. If you request your files and documents we may charge you for the costs of copying a duplicate.

If personal information is only useful for a short period e.g. for specific marketing campaigns we may delete it sooner than stated above, without further notice or liability.

10 Confidentiality and security of your personal information

We are committed to keeping the personal information provided to us secure and we will take reasonable precautions to protect personal information from loss, misuse or alteration. For details of these precautions, please review our **information security assurance statement** which you can access by visiting www.fourcommunications.com/infosec-assurance-statement.

We have implemented information security policies, rules and technical measures to protect the personal information that we have under our control from:

- unauthorised access;
- improper use or disclosure;
- unauthorised modification; and
- unlawful destruction or accidental loss.

All of our members, employees, workers and data processors (i.e. those who process your personal information on our behalf, for the purposes listed above), who have access to, and are associated with the processing of personal information, are contractually obliged to respect the confidentiality of the personal information of all visitors to the Website and all users of our Services.

11 How to access your information and your other rights?

You have the following rights in relation to the personal information we hold about you:

- **Your right of access.**
If you ask us, we'll confirm whether we're processing your personal information and, if necessary, provide you with a copy of that personal information (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.
- **Your right to rectification.**
If the personal information we hold about you is inaccurate or incomplete, you're entitled to have it rectified. If you are entitled to rectification and if we've shared your personal information with others, we'll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.
- **Your right to erasure.**
You can ask us to delete or remove your personal information in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable). If you are entitled to erasure and if we've shared your personal information with others, we'll let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.
- **Your right to restrict processing.**
You can ask us to 'block' or suppress the processing of your personal information in certain circumstances such as where you contest the accuracy of that personal information or you object to us. If you are entitled to restriction and if we've shared your personal information with others, we'll let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.
- **Your right to data portability.**
With effect from 25 May 2018, you have the right, in certain circumstances, to obtain personal information you've provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.
- **Your right to object.**
You can ask us to stop processing your personal information, and we will do so, if we are:
 - relying on our own or someone else's legitimate interests to process your personal information, except if we can demonstrate compelling legal grounds for the processing; or
 - processing your personal information for direct marketing.

- **Your rights in relation to automated decision-making and profiling.**
You have the right not to be subject to a decision when it's based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for entering into, or the performance of, a contract between you and us.
- **Your right to withdraw consent.**
If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.
- **Your right to lodge a complaint with the supervisory authority.**
If you have a concern about any aspect of our privacy practices, including the way we've handled your personal information, you can report it to the UK Information Commissioner's Office (ICO). You can find details about how to do this on the ICO website at <https://ico.org.uk/concerns/> or by calling their helpline on 0303 123 1113.

12 Collection of information by third-party websites and sponsors

The Website contains links to other websites whose information practices may be different than ours. Visitors should consult the other websites' privacy notices as Four has no control over information that is submitted to, or collected by, these third parties

13 Changes to this Privacy Notice

We may make changes to this Privacy Notice from time to time.

To ensure that you are always aware of how we use your personal information we will update this Privacy Notice from time to time to reflect any changes to our use of your personal information. We may also make changes as required to comply with changes in applicable law or regulatory requirements. We will notify you by e-mail of any significant changes. However, we encourage you to review this Privacy Notice periodically to be informed of how we use your personal information.