



## **Data Privacy Policy – updated May 2018**

**Torch Marketing Co Ltd** is committed to protecting the privacy of the information you share with us when you access and use our websites, applications, products, events, services and other offerings (**Services**). This Privacy Statement (referred to herein as “policy”) describes how we collect, use and share the personally identifiable information (**PII**) you provide to us when you register or contract with us to receive Services. This policy may be supplemented by additional privacy terms or notices disclosed to you in connection with your registration for or receipt of Services.

### **Information Collection**

We collect PII and/or anonymous information from you in the course of your use of the Services. That includes information you provide to us when you subscribe or register for any of our digital, printed products, services, events, or offerings; sign up for newsletters or promotions; participate in a survey; purchase a product or service; use one of our mobile applications; post comments; and/or otherwise communicate with us or interact with the Services.

### **Automatic Collection Technologies**

Like most website operators, we use cookies (small data files stored on your computer by your web browser upon visiting a website), web beacons, and similar technologies to operate our Services efficiently and as intended. Through these technologies we gather information about you, such as your browser type, operating system, IP address, mobile device identification number, and navigation history. We may also use these technologies to gather information about your interactions with our Services, such as the time and date when you viewed or used a page or item of content or functionality, which advertisements you have clicked on and whether you filled out an online form. When you receive newsletters or promotional emails from **Torch Marketing**, we use web beacons, customized links or similar technologies to determine whether the email has been opened and which links you click, in order to provide you more focused email communications or other information.

You may set your browser to block all cookies, while using our Services (in which case some aspects of the Services may not function properly), or you may set your browser to block third-party cookies and allow first-party cookies, which would allow us (but not third parties) to collect such information. In addition, some browsers may allow you to block certain web beacons and similar tracking codes. Please refer to your browser’s documentation if you wish to block some or all cookies, web beacons, and/or similar tools.

We reserve the right to use new technologies, as they become available, to gather additional, relevant information from our users and improve our Services and your experience of them.

### **How We Use Your Information**

We may use information about you:

- To provide you with Services and information that you have requested from us or that we think may be of interest to you.
- To send account notices or otherwise manage your account, respond to requests, inquiries, comments or concerns.
- To offer you customized content and individualized personalization of the Services to make them more relevant to your professional interests and responsibilities.
- To ask for your input to help in our research about our Services.



- To contact you with information about, and provide invitations for, products, services, events and research opportunities – ours and other companies’ – directed at your professional interests and responsibilities.
- To give suppliers in our communities a limited opportunity to find you: We make contact data, including email addresses, available in certain of our subscription-only databases. If you wish to find out whether contact information about you is in a database or to have data removed, please email [privacy@torchmarketing.co.uk](mailto:privacy@torchmarketing.co.uk).
- For any other purpose that we disclose when you give us the information.

## **Consent**

By using Torch Marketing’s Services (for example, when you register for an account, purchase a product or service, enter a contest or promotion, communicate with us, or use interactive portions of our sites and applications), you consent to our collection, use and sharing of your PII as described in this policy. In some cases we may also ask you to confirm your knowledge of the terms of this policy; however, we are not obligated to do so

## **Your Choices**

You may opt-out of our email marketing lists by following the directions at the bottom of our emails. Please note that Torch Marketing has a number of brands and products and we allow you to opt-out selectively. To remove a specific email address from all of Torch Marketing’s marketing communications, you may send a request to [privacy@torchmarketing.co.uk](mailto:privacy@torchmarketing.co.uk). If you wish to remove your email address only from a specific brand, please use the opt-out mechanism provided in emails you receive from such brand or contact the brand directly.

You may receive email marketing messages from us about other companies’ offerings as part of a business partner marketing program. To opt-out of a business partner marketing email program, you may follow the instructions at the bottom of any email we send you as part of the program.

Please note that opting-out of promotional mailings will not affect delivery of your subscription-based products.

## **Disclosure of Your Information**

Torch Marketing contracts with other companies to provide certain services on our behalf, including customer service, credit card and billing processing, shipping, subscription fulfilment, research, analytics, list cleansing, postal mailings, email and fax deployment, telemarketing, and other information and business services. We only provide these companies with the relevant information required to perform their services and they are explicitly restricted from using any data received from us for their own marketing purposes.

We may also provide your information to third parties for marketing and/or analytical purposes as further described below:

### *Sponsors and Gated Resources*

From time to time our sponsors wish to contact our subscribers and customers who have indicated an interest in their products, services or events. If you register for Services offered by these vendors, you choose to share your name and contact details directly with those vendors so that they may contact you. For example, if you register for a vendor-branded (or co-branded with us) resource, we will collect your registration information on behalf of that vendor for its own use. We may also keep a copy of that data for our own use, consistent with this privacy statement. We may provide a link to the vendor’s privacy policy (as well as to this policy) on the registration page.



If you want to know how a vendor or advertiser will use data about you, we urge you to check that vendor's or advertiser's privacy policy. As noted above, your registration for and log-on to any of the above Services constitutes your consent to be put in touch directly with any vendors you select. The vendor's or advertiser's privacy policies will control their use of your information and you should review those policies.

Some of our apps allow you to make information available to others who are also using the same app – for example, at an in-person event. We recommend that you review and understand how the app will work, what access it may have to your social media or other accounts, and what choices you may have.

### **Third-Party Advertising Technologies**

We use third-party advertising, data analytics and online targeting companies to serve ads when you visit our sites or use our applications. We may also provide your PII to these third parties to allow them to more effectively target advertising to you. These companies are obligated to protect your information, but you may opt-out of this sharing through the process described.

When advertisements are displayed to you on our sites and applications, one or more persistent cookies may be placed on your computer or device by us or a third party. Some of these third parties may use information (including PII) about your visits to this site and other websites and usage of applications in order to provide data and targeting recommendations. This may result in your receipt of advertisements about goods and services anticipated to be of interest to you. Please note that we do not control cookies and other data collection technologies that the ad servers may allow or that their advertisers may use. As discussed above, this may result in your receipt of advertisements about goods and services of anticipated interest to you served by these ad servers on third-party sites based on your use of Torch Marketings services.

### **Correcting and Updating Your Information**

If you are a registered user, you can access your account information and make corrections or updates upon log-in. The accuracy of such information is solely your responsibility. You may also separately contact us to request access to other PII about you which is in our possession. If you request to deactivate your account or delete your PII, we will endeavour to fulfill your request but some PII may persist in backup copies for a certain period of time and may be retained as necessary for legitimate business purposes or to comply with our legal obligations.

### **Cross-Border Information Transfer**

Torch Marketing (or our third party service providers) may process your Personal Data in other countries than your country of residence, whose data protection laws may not be as extensive as in the European Economic Area. However, we have taken appropriate steps to ensure the same level of protection for the processing carried out in those countries as within the European Economic Area.

### **Information Security**

We use a variety of technical, physical, and administrative security measures to secure the confidentiality of your PII and to protect it from loss, misuse, alteration, and destruction. However, due to the design of the Internet and other factors outside our control, we cannot guarantee that communications between you and our servers will be free from unauthorized access by third parties or by government agencies. You remain responsible for protecting your user name and passwords and for the security of information in transit to us over the Internet.

### **Links**

This policy covers how Torch Marketing uses the PII you provide to us. Although we may provide links to other sites for your convenience and information, this policy does not apply to the



practices of third parties that we do not own, control or manage. While we try to work only with companies that share our respect for your privacy, we do not take responsibility for the content or privacy policies of their sites, applications, or services. We encourage you to carefully review the privacy policies of all third-party sites, applications and services you access. We also cannot control how others may use information you may make public on our sites – for example, on bulletin boards, blogs, chat rooms, virtual events, or other public forums or sites permitting user-generated content.

#### **Other Important Information**

Torch Marketing reserves the right to access and disclose PII to comply with applicable laws, government requests, court orders and other legal requirements, or to investigate alleged or suspected fraud or violations of the terms and conditions governing our Services.

Our Services are directed to business professionals. They are not intended for children under the age of eighteen.

#### **Changes to This Privacy Statement**

As new products and services are offered or as existing products and services are improved, we may need to update this policy. When we do so we will post the changes here. For material changes we may also email our registered users with the new details. We encourage you to review this policy from time to time to stay informed about how we are protecting the PII you provide. Your continued use of our Services covered by this policy constitutes your consent to the practices in place at the time of your use.

#### **How to Contact Us**

If you have any questions, comments, or requests regarding this policy or our processing of your information, please contact [privacy@torchmarketing.co.uk](mailto:privacy@torchmarketing.co.uk) or write/call us at:

Customer Service  
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