

Nimbus Ninety Ltd – Privacy Policy (as at 30 Jan 2020)

1. Introduction

This privacy policy (**Privacy Policy**) sets out the ways in which **Nimbus Ninety** (by which we mean Nimbus Ninety Limited, registered in the United Kingdom - Company Number **06803745**) may use your personal data. In this Privacy Policy:

- a. ‘**we**’, ‘**us**’ or ‘**our**’ means the Nimbus Ninety entity with which you are interacting as detailed above. For example, the Nimbus Ninety entity organising the event you are attending, or managing the website you are using. We will make it clear to you which entity this is;
- b. ‘the **site**’ means the Nimbus Ninety website you are visiting or engaging with; and
- c. ‘**you**’ and ‘**your**’ means you, the person or organisation engaging with us, registering for our events or services or visiting our site.
- d. ‘**Supplier**’ means an entity supplying goods or services to us.
- e. ‘**Member**’ means anyone registered with us as a member, subscribing to any of our services, or attending an event as a delegate.
- f. ‘**Personal data**’ means information relating to an identified or identifiable individual where such processing is either:
 - (1) wholly or partly by automatic means

or

 - (2) where the personal data forms part of a ‘filing system’ or is intended to form part of a ‘filing system’.
- g. ‘**Partner**’ means the party named as such on a Partnership Agreement participating in and/or partnering the individual activities including each event.
- h. ‘**Third party**’ means any party other than us or you.

By registering for one of our events, subscribing to any of our services, visiting our site or otherwise interacting with us, we will process your personal data in accordance with this Privacy Policy.

2. How you can contact us

If you have any questions about this Privacy Policy, wish to unsubscribe from marketing emails, or have your records deleted, then please write to the Data Protection Officer:

Address: FAO the Data Protection Officer, Nimbus Ninety, 16 Northfields Prospect Business Centre, Putney Bridge Road, London, England, SW18 1PE

Email: operations@nimbusninety.com

3. **Information we may collect about you**

- a. **Information you give us:** We collect information you provide to us when you complete registration / contact forms, or provide us with details over the phone or by email, for example when you register as a member with us, register to attend one of our events (whether as a delegate, exhibitor, speaker or attendee) or subscribe to our mailing list. This information might include your name, address, email address, phone number, credit card information and other information relevant to the event or service that you're registering for.
- b. **Information we collect about you:**
 - (1) We will collect information contained in any correspondence between you and us, and emails or telephone calls.
 - (2) We may collect, for the purposes of any events, information about your attendance at and engagement with the event. For example, for certain events, we will collect information about which Partners you have engaged with and which sessions you have attended.
 - (3) We collect information about you visiting our website and how you use it. This may include your IP address, geographical location, device information, browser type, referral source, length of visit, operating system, number of page views, which pages you viewed and similar information. This information may be collected by a third party website analytics service provider on our behalf and/or may be collected using cookies. We also use cookies and pixels in our emails to track delivery and open rates, the results of which are stored against your email address and profile. For more information on cookies please refer to paragraph 6 below.
- c. **Information we receive from third parties:** We may collect information about you from third parties that we work closely with for the purposes of delivering to you the services that you request from us. For example, we may engage third parties to assist us with our payment systems; these entities will collect information directly from you on our behalf. We may engage third parties to operate online services on our behalf; these entities will collect information directly from you about your visits to the website on our behalf. We may also receive information about you from third parties such as industry colleagues of yours who believe that you may wish to attend our events or use our services on behalf of your organisation, or may use

information from publicly available sources in order to offer services in which your business may be interested.

3. How we use information about you

We may use your information for the following purposes, depending on the relationship we have with you. Prior to submitting your personal data to us, we will provide you more specific information where necessary about how we will use your data, give you the option of opting-out of some or all uses of your personal data by us, and link you to this privacy policy.

We use personal data to:	The purpose of this is:	The applicable legal basis:
Provide you with information that you have requested from us in relation to services that we provide (eg. Events that we run, content that we produce, etc).	We will need to use your contact details to keep you updated about the products or services you have indicated you are interested in.	By specifically requesting information from us, you are consenting to us using your personal data for the purposes of communicating such information to you.
Provide you with information that we believe may be relevant to you in your current appointment within your organisation.	We will need to use your contact details to inform you about our products or services that we believe may be relevant to your organisation.	We have a legitimate interest in conducting Business to Business Marketing. Where we rely on legitimate interests in this way, we will always offer an opt out, and / or Unsubscribe option on any marketing information we send you.
For general administration and organisation of our events, for example to contact you with information about an event that you're exhibiting at, speaking at, or attending.	We may need to use your details for planning and logistics, to invoice you, to provide you customer service in relation to the event, and general administration of your attendance at the event. We may also share your personal data with Partners participating in an event for this purpose.	Where you are attending an event in any capacity, it is in our legitimate interest to use your personal data for general administration and logistics of the event, and we may need to use your personal data in this way to perform any contractual obligations that we have to you.

<p>So that you can be contacted about other similar events, products or services of ours or of our Partners that may be of interest to you, or for research purposes, in relation to an event you have registered.</p>	<p>To keep you up to date on similar events to those that you have previously attended of ours, or products or services that you have previously discussed either with us or our Partners; or to analyse the effectiveness of our products and offerings to you.</p>	<p>It is in our Legitimate Interest and that of our Partners to keep you up to date on similar events to those that you have previously registered, and on products or services that you have previously discussed either with us or our Partners. Where we rely on legitimate interests in this way, we will always offer opt out and unsubscribe options on any marketing emails we send you, or will action any requests made by you in response to personal emails or phone calls to us to opt out of future communication. If you request us to do so, we will also contact the Partner(s) of any event(s) that you have attended and request that they opt you out of or unsubscribe you from any future marketing emails.</p> <p>On occasions some of our Partners will instead wish to rely on Consent rather than Legitimate Interest for the processing your Personal Data. When this is the case this will be made clear to you when you register, and we will only share your Personal Data with the Partner with your consent.</p>
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<p>Pass details to our Suppliers to enhance your experience at an event you have signed up to attend in any capacity.</p>	<p>We engage Suppliers in order to enhance your experience at our events, such as engaging stand builders, WiFi providers, security, etc.</p>	<p>Where we need to share these details with such Suppliers in order to perform the contract we have with you, the legal basis would be the performance of a contract.</p> <p>In other circumstances, we have a legitimate interest to provide the details to our Suppliers, because these services are required for a seamless event experience, and it is in your interest to be provided with this information. If you would prefer us not to share these details with our suppliers, you can let us know in advance by informing us by email.</p>
<p>To assess the activity of our attendees at our events.</p>	<p>We assess how attendees engage with our events. We do this by recording meetings that you have with our Partners, which sessions you attend during the events. We analyse this information to improve and enhance our events.</p>	<p>It is in our legitimate interest to monitor the location and engagement of our attendees at our events, and to ensure our compliance with Agreements signed with our Partners. If you would prefer us not to record this information on you, you can let us know in advance.</p>
<p>Transfer your contact details to a Partner who has not been associated with the event(s) that you have registered for, or a Member with your consent.</p>	<p>The purposes for which Partners or Members have requested your personal data will be communicated to you by us.</p>	<p>In these circumstances we will only share your Personal Data with a Partner with your consent.</p> <p>We will only ever share your data with a Member with your consent.</p>

Analyse user traffic to measure use of our websites and improve their content.	We may use information such as your IP address for analytical purposes of our pages, this could also include improving the content of our websites and services.	We have identified web analytics as a legitimate interest of our business, and allow us to better meet your needs as a customer.
To comply with or abide by legal obligations or requirements.	We may need to use or process your personal data to comply with some legal requirements, an example being health and safety or fire safety at an event.	Where we need to process your data for these reasons, the legal basis will be compliance with a legal obligation.
Conduct polls and interviews for use in our reports and publications.	We may ask you to participate in surveys or interviews for use in our reports, magazines, or other content produced by Nimbus Ninety, or which Nimbus Ninety may conduct on behalf of our partners.	We will only collect and hold personal data on you for our research and reports with your prior consent. Personal data will only be reproduced in our content with your prior consent. Any personal data you provide for this purpose will be deleted once it is no longer required by us, or if requested by you in writing.

5. Who we might share your data with

In certain circumstances we may share your personal data with:

- a. Our Partner(s) at our events that you register for in order that they can contact you about their products and services as it is in their legitimate interests to do so.
- b. Any Partner or selected third party that you consent to our sharing your information with for marketing purposes (such consent will be sought prior to our sharing of this data).
- c. Selected third parties that we work with, where necessary for the purposes of delivering to you services that you request from us. For example, when you register to attend an event that we host, we may need to share your information with third party sub-contractors, service providers or other Nimbus Ninety entities. Where we use such third parties, we enter contracts which ensure that the third party is obligated to provide at least the same level of data protection as the Nimbus Ninety entity entering into that contract, and we take reasonable, appropriate steps to ensure that the contractor effectively

processes the personal data in a manner consistent with this Privacy Policy and our internal policies relating to the protection of Personal Data.

- d. Any other third parties where necessary to enable us to enforce our legal rights, or to protect the rights, property or safety of our employees or where such disclosure may be permitted or required by law.

6. **Cookies**

We use cookies to ensure that you get the most out of our site. Cookies are small text files which we store on the device you use to access the site. Cookies allow us to monitor your use of the software and simplify your use of the site. For example, a temporary cookie is also used to keep track of your "session". Without that temporary cookie (which is not stored after you quit your browser) you would have to log on every time you access a new page.

If you do not wish for cookies to be installed on your device, you can change the settings on your browser or device to reject cookies. For more information about how to reject cookies using your internet browser settings please consult the "Help" section of your internet browser (or alternatively visit <http://www.aboutcookies.org>).

Please note that, if you do set your Internet browser to reject cookies, you may not be able to access all of the functions of our websites.

7. **Third Party Content, Sites, and Contributions**

Some of our websites may contain content and links to other websites or apps that are operated by third parties. We don't control these third party websites or apps (including whether or not they store cookies) and this Privacy Policy does not apply to them. Please consult the terms and conditions and Privacy Policy of the relevant third party website or app to find out how that site/app collects and uses your information and to establish whether and for what purpose they use cookies.

8. **How we look after your data and how long we keep it for**

We use a variety of technological and operational security measures to protect your information against any unauthorised access to, unlawful use of, and modification and destruction of any personal data we store.

We will retain your information for as long as is necessary to provide you with our services, or for as long as the law otherwise permits. Where you have not participated, attended or registered to attend or participate in one of our events, or otherwise engaged with us for five years, we will delete your personal data unless we have an obligation to retain it for longer (for example for taxation purposes).

Transmission of information over the internet can be insecure, and although we employ measures to protect your information from unauthorised access we cannot always guarantee the security of information sent over the internet.

9. **Where we store your information**

With the exception of a limited amount of data which may be filed on hard drives and paper in our offices, information collected about you may be stored on the following systems:

- a. Survey Monkey (<https://www.surveymonkey.com/mp/legal/privacy-policy/>)
- b. Hubspot (<https://legal.hubspot.com/privacy-policy>)
- c. Google (<https://policies.google.com/privacy/update>)
- d. Zapier (<https://zapier.com/privacy/>)
- E. Klipfolio (<https://www.klipfolio.com/legal/privacy-statement>)

10. **Your rights in relation to your Personal Data.** You have the right to:

- a. Request a copy of the personal data that we keep about you, by making a request in writing to the Data Protection Officer. Our Data Protection Officer's details are provided on Page 1 of this policy. You can ask us to provide the data in a commonly used, machine readable format, and where we are able to; transmit this data to another organisation.
- b. Contact the Data Protection Officer if you are concerned that any of the information we hold on you is incorrect, to have that data corrected.
- c. Contact the Data Protection Officer to ask us to stop processing your data, or withdraw consent where we are relying on consent as the legal basis for any processing of your data.
- d. Contact the Data Protection Officer to request that we delete your personal data.
- e. To lodge a complaint with the data protection authorities if you believe we have not complied with any applicable data protection law. In the UK, the relevant authority is the Information Commissioners Office, you can find their details at www.ico.org.uk.

11. **CHANGES TO THIS PRIVACY POLICY**

We may update this Privacy Policy from time to time. Updated privacy policies will be updated on the Nimbus Ninety website, or provided to you at your request.