



## **PRIVACY POLICY**

### **PRIVACY & SECURITY**

The Grove Media Limited is committed to safeguarding your privacy. This policy explains what information we collect and how we use the personal information you supply to us.

In using our enquiry form on our website, any of our services or providing us with any personal information we will assume you are agreeing to your information being used and disclosed in the ways described in this policy.

### **WHO WE ARE?**

The Grove Media Limited is one of the leading independent media agencies in the UK.

Established in 1977, it is wholly owned by the working directors, with offices in London and Wilmslow. The company specialises in the planning and buying of TV, Press, Out of Home, Cinema, Radio, Direct (Door-to-Door distribution) and Digital advertising.

The company is registered in England and Wales under Registered Number 01078103 and its head office address is 128 City Road, London EC1V 2NX.

### **DATA PROTECTION LAW**

In carrying out our day-to-day activities we process and store personal information relating to our customers and suppliers and are therefore required to adhere to the requirements of all applicable data protection legislation including the UK Data Protection Act 1998 and all guidance, codes of practice, recommendations and deliberations of the UK Information Commissioner, in each case as amended or replaced from time to time.

We take our responsibilities under these laws very seriously and are always striving to ensure the personal information we obtain is held, used, transferred or otherwise processed in accordance with these laws.

## WHAT PERSONAL INFORMATION WE COLLECT

When you e-mail us an enquiry, request information from us (for example in response to your brief) or agree to use our media agency services, you will be asked to provide certain information such as your name, business correspondence address, telephone number and email address.

We also collect personal data from you indirectly, such as your browsing activity while on our website, technologies explained in the section on 'Use of Cookies' below.

The kind of data that may be collected automatically when using our website includes IP addresses, domain names, browser type and version, time zone setting and location, operating system and platform, device ID, URI addresses and other information about how you interact with our website ("Usage Data").

We will receive personal data from various third parties such as from analytics providers such as Google. For further information, please see the table at the end of this policy.

We may also collect data relating to your preferences in receiving marketing from us and your communication preferences.

## USE OF COOKIES

A cookie is a small text file which is placed on your device when you use our website. We use cookies on our website. These are used for technical purposes and for certain other purposes, such as providing us with information about how you interact with our website.

We also use third-party software which uses IP tracking to identify visitors and monitor their activity on our website.

For further information on our use of cookies and other tracking technologies (including when we will request your consent before placing them and how to disable them), please see our Cookie Policy.

## HOW WE USE YOUR INFORMATION

We will collect and process your personal information if we have a legal basis to do so. We may rely on the following bases:

**Consent:** You have given your consent to the processing.

**Contract:** It is necessary for us to fulfil our contractual obligations.

**Legal obligation:** it is necessary for us to comply with a legal obligation.

**Legitimate interests:** it is necessary for our legitimate interests or those of third parties. A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests.

**Public interest:** it is necessary to perform a task in the public interest.

Where consent is required and given, we may send you relevant information by mail or email such as company news, market updates, industry specific insights and invitations to our corporate events.

Personal data is also processed for the following purposes and using the following services.

<b>Purpose</b>	<b>Type of Personal Data and Service Provider</b>	<b>Lawful basis</b>
Analytics	Google Analytics and Wordpress Stats <b>Personal Data:</b> Cookies; Usage Data	Legitimate Interests Consent
Managing contacts and sending messages	Mailgun and Mandrill <b>Personal Data:</b> email address, first name, last name, phone number	Legitimate Interests Consent
Platform services and hosting	WordPress.com <b>Personal Data:</b> various (as specified in the table at the end of this policy)	Legitimate Interests Consent
Registration and authentication	WordPress.com Single Sign On <b>Personal Data:</b> various (as specified in the table at the end of this policy)	Legitimate Interests Consent
Tag Management	Google Tag Manager <b>Personal Data:</b> Usage Data	Legitimate Interests Consent
Traffic optimization and distribution	Cloudflare <b>Personal Data:</b> Cookies, various (as specified in the table at the end of this policy)  Sucuri CloudProxy <b>Personal Data:</b> various (as specified in the table at the end of this policy)	Legitimate Interests Consent

The table at the end of this policy contains more detail about what we use your personal data for and why.

## **WHO WE SHARE THE INFORMATION WITH**

We may share your personal data where necessary with the parties set out in the table at the end of this policy.

As part of our contractual and legal obligations we may be required to share your personal information with our auditors, our credit insurers, our legal advisors and the government.

These organisations are under strict obligations to keep your personal information private.

## **PROTECTING YOUR PERSONAL DATA**

We take appropriate security measures to prevent the unauthorised access/destruction, disclosure or modification of your personal information. All personal information is held on secure servers and subject to access restrictions to ensure integrity and confidentiality.

In situations where these servers are externally hosted, we will only use reputable hosting companies which adhere to security policies and procedures at least as stringent as our own.

## **STOPPING COMMUNICATION FROM US**

If you decide you no longer want us to contact you, you can request that we stop by clicking 'unsubscribe' on any marketing emails you receive.

Alternatively, you can email [unsubscribe@thegrovedmedia.co.uk](mailto:unsubscribe@thegrovedmedia.co.uk) stating your name, business correspondence address, telephone number and email address, ensuring **UNSUBSCRIBE** is typed in the subject field.

## **LEGAL ENFORCEMENT**

We may share your data with other organisations if we are under a duty to disclose or share your personal data to enforce or apply our Terms and Conditions and other agreements.

Information may also be shared to protect the rights, property or safety of The Grove Media Limited and our staff.

## **THIRD-PARTY SITES**

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies.

Please check these policies before you submit any personal data to these websites.

## **HOW LONG YOUR PERSONAL DATA WILL BE KEPT**

We will not keep your personal data for longer than we need it for the purpose for which it is used. Such data may be retained for longer if necessary due to applicable legal requirements or if you have consented to such longer retention (as long as such consent is not withdrawn).

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, the purposes for which we process your personal data and whether we can achieve those purposes through other means.

## **TRANSFERRING YOUR PERSONAL DATA OUT OF THE UK AND THE EEA**

If we are required to transfer your data outside the UK, EEA and/or countries with an adequate level of protection of personal data, we will put in place appropriate measures to protect your rights. This may include approved standard contractual clauses with the recipient.

If you would like more detail about such transfers and safeguards, please contact us.

## **YOUR RIGHTS UNDER THE DATA PROTECTION ACT**

You have the right to:

- Request a copy of the information we hold about you ("Right of Access")
- Update or amend the information we hold about you if it is wrong ("Right to Rectification")
- Ask us to remove your personal information from our records in certain circumstances ("Right to Erasure")
- Limit the way we process your data in certain circumstances ("Right to restrict processing")
- Object to the processing of your information (at any time for marketing purposes and in certain other situations, e.g., where we use your information for our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims) ("Right to Object")
- Receive the information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party, in certain circumstances ("Right to Data Portability")
- Raise a concern or complaint about the way in which your information is being used.

## **CONTACT US**

If you wish to find out more about your rights or obtain a copy of the information we hold about you, please email [DPC@thegrovedmedia.co.uk](mailto:DPC@thegrovedmedia.co.uk). Alternatively, you can write to us at:

**Data Protection Commissioner  
The Grove Media Limited  
Unit 5.29  
Grand Union Studios  
332 Ladbroke Grove  
London  
W105AD**

You also have the right to lodge a complaint with the Information Commissioner. The Information Commissioner may be contacted using the details at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.

### **CHANGES TO THE SECURITY AND PRIVACY POLICY**

We keep our Security and Privacy Policy under regular review. If we make changes to this policy, we will notify you by updating the policy on our website.

**Further information:**

<b>Purpose</b>	<b>Details (service provider and type of personal data)</b>
Analytics	<p>These services enable us to monitor and analyse web traffic and keep track of user behaviour.</p> <p><b><u>Google Analytics</u></b> Google Analytics is a web analysis service provided by Google Ireland Limited ("Google"). Google utilizes the data collected to track and examine the use of this website, to prepare reports on its activities and share them with other Google services. Google may use the data collected to contextualize and personalize the ads of its own advertising network.</p> <p><b>Personal Data processed:</b> Cookies; Usage Data. <b>Place of processing:</b> Ireland – Privacy Policy – Opt Out.</p> <p><b><u>Wordpress Stats (Automattic Inc.)</u></b> Wordpress Stats is an analytics service provided by Automattic Inc.</p> <p><b>Personal data processed:</b> Cookies; Usage Data. <b>Place of processing:</b> United States – Privacy Policy.</p>
Managing contacts and sending messages	<p>This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with you. These services may also collect data concerning the date and time when the message was viewed by you, as well as when you interacted with it, such as by clicking on links included in the message.</p> <p><b><u>Mailgun (Mailgun Technologies, Inc.)</u></b> Mailgun is an email address management and message sending service provided by Mailgun Technologies, Inc. <b>Personal data processed:</b> email address; first name; last name; phone number. <b>Place of processing:</b> Germany – <a href="#">Privacy Policy</a>.</p> <p><b><u>Mandrill (The Rocket Science Group LLC)</u></b> Mandrill is an email address management and message sending service provided by The Rocket Science Group, LLC. <b>Personal data processed:</b> email address; first name; last name; phone number. <b>Place of processing:</b> United States – <a href="#">Privacy Policy</a>.</p>
Platform services and hosting	<p>These services have the purpose of hosting and running key components of this website, therefore allowing the provision of this website from within a unified platform. Such platforms provide a wide range of tools to us – e.g. analytics, user registration, commenting,</p>

	<p>database management, e-commerce, payment processing – that imply the collection and handling of personal data. Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the personal data are stored.</p> <p><b><u>WordPress.com (Automattic Inc.)</u></b> WordPress.com is a platform provided by Automattic Inc. that allows us to build, run and host this website. <b>Personal data processed:</b> various types of data as specified in the privacy policy of the service. <b>Place of processing:</b> United States – <a href="#">Privacy Policy</a>.</p>
<p>Registration and authentication</p>	<p>By registering or authenticating, users allow this website to identify them and give them access to dedicated services. Depending on what is described below, third parties may provide registration and authentication services. In this case, this website will be able to access some data, stored by these third-party services, for registration or identification purposes.</p> <p><b><u>WordPress.com Single Sign On (Automattic Inc.)</u></b> WordPress.com Single Sign On is a registration and authentication service provided by Automattic Inc. and is connected to the WordPress.com network. <b>Personal data processed:</b> various types of data as specified in the privacy policy of the service. <b>Place of processing:</b> United States – <a href="#">Privacy Policy</a>.</p>
<p>Tag Management</p>	<p>This type of service helps us to manage the tags or scripts needed on this website in a centralized fashion. This results in your data flowing through these services, potentially resulting in the retention of this data.</p> <p><b><u>Google Tag Manager (Google Ireland Limited)</u></b> Google Tag Manager is a tag management service provided by Google Ireland Limited. <b>Personal data processed:</b> Usage data. <b>Place of processing:</b> Ireland – <a href="#">Privacy Policy</a>.</p>
<p>Traffic optimization and distribution</p>	<p>This type of service allows this website to distribute content using servers located across different countries and to optimize their performance. Which personal data is processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between this website and your browser. Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain your personal information are transferred.</p> <p><b><u>Cloudflare (Cloudflare Inc.)</u></b></p>



	<p>Cloudflare is a traffic optimization and distribution service provided by Cloudflare Inc.</p> <p>The way Cloudflare is integrated means that it filters all the traffic through this website, i.e., communication between this website and your browser, while also allowing analytical data from this website to be collected.</p> <p><b>Personal data processed:</b> Cookies; various types of data as specified in the privacy policy of the service.</p> <p><b>Place of processing:</b> United States – <a href="#">Privacy Policy</a>.</p> <p><b><u>Sucuri CloudProxy (Sucuri, Inc.)</u></b></p> <p>Sucuri CloudProxy is a traffic optimization and distribution service provided by Sucuri, Inc.</p> <p>The way Sucuri CloudProxy is integrated means that it filters all the traffic through this website, i.e., communication between this website and your browser, while also allowing analytical data from this website to be collected.</p> <p><b>Personal data processed:</b> various types of data as specified in the privacy policy of the service.</p> <p><b>Place of processing:</b> United States – <a href="#">Privacy Policy</a>.</p>
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This privacy policy was last updated May 2024