

PARTNERIZE PRIVACY POLICY

Public

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1. INTRODUCTION AND GENERAL TERMS

Performance Horizon Group Limited (“Partnerize”) and its subsidiary companies (together “we” or “us”) respect your privacy and are committed to protecting personal data about you (your “information”).

Partnerize is registered in England, and our registration number with the UK Information Commissioner is Z2226774.

This Privacy Policy relates to our use of:

- Information you provide to us through our website;
- Information we receive about you from third parties;
- Information you provide to us through the use of our technology and associated services (the “platform”); and
- Information you provide to us through other means such as email, telephone and direct communications.

This Privacy Policy explains the following:

- The types of information we collect about you and how we use it;
- How we will treat your information;
- Your rights as a data subject;
- Sharing your information with third parties;
- Transfers outside the European Economic Area and/or United Kingdom;
- How long we will keep your information; and
- the data processing services we provide and the cookies used in connection with them.

Whenever you provide such information, we are legally obliged to use it in line with all applicable laws concerning the protection of personal data (these laws are referred to collectively in this Privacy Policy as the “data protection laws”).

2. THE TYPES OF INFORMATION WE COLLECT ABOUT YOU AND HOW WE USE IT

Information provided through our website

Where you have asked to receive further information about our products or services, we will use this information to contact you until you request otherwise. Instructions for how to opt out of any mailing lists will be included in communications that use those lists.

If you apply for a job advertised on our website, we will use your information to process your application. If you send to us a speculative CV and there is no suitable position currently available, we may wish to retain your CV and other details on file until a suitable vacancy arises.

When you visit our website, we log your IP address. However, we only use that address:

- in order to ensure that our website has sufficient resources to manage the traffic visiting it; and
- if we need to investigate any security concerns.

Information we receive about you from third parties

If you are a partner (someone operating as an affiliate or publisher of a website that makes commission through the referral of consumers to websites), we may receive information about you from the companies you do business with. This often happens if you run a partner website and one or more of the companies whose products you promote has recently started using our technology. In that case our customer may give us your information so that we can request you join its campaign on our platform.

If you are in the performance marketing industry, our sales and marketing teams may receive information about you from a business intelligence supplier.

We may receive information about you from third party suppliers. For example, a recruitment agency may supply us with your CV where you have given your consent to be considered for a role with us.

Information you provide to us through your use of our technology

You provide certain information (such as a username and password) to us when you sign up to use our technology. If you run a partner website, you may also have provided us with bank account details in order to allow us to make payments to you.

Additionally, we may also monitor your use of our products and services to see, for example, which tools you use most often, the types of companies you work with, how you perform as a partner including the type and quality of traffic you send, how much you download from our servers or how frequently you call our API. We may use this information:

- to improve our products and services and design new ones;
- to manage the load on our system; and
- for security purposes – we may, for example, use the email address you provide at login to contact you if we believe your account has been compromised.

Information you provide to us through other means

We may also receive information from you:

- in relation to you holding shares in Partnerize;
- through other means such as email, interacting with us through social media or at events, or telephone conversations.

Legal basis for processing

Our processing of this information is based upon our legitimate interest in providing marketing technology services unless:

- we have specified otherwise in this policy;
- you have given your consent to our processing of this information, where consent is legally required; or
- you are party to a contract (such as our partner terms or Articles of Association) that requires we process your information in order to perform such contract.

Contacting you

If we have an existing business relationship with you, we may contact you in the course of that relationship. This includes (but isn't limited to) contacting you to resolve outstanding issues; monitoring your account and alerting you to opportunities, events and developments; to put you in touch with other entities that we work with and who may be interested in working with you; and/or to determine whether you are interested in reactivating or expanding the business relationship with us or wish to bring it to an end.

We will not contact you for marketing reasons unless:

- you have given your consent for us to do so;
- you are already using our services;
- we're otherwise permitted by law to do so.

You can opt out of our marketing communications at any time.

3. HOW WE WILL TREAT YOUR INFORMATION

We will ensure that any information Partnerize holds about you will be:

- used lawfully, fairly and in a transparent way;
- collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- relevant to and adequate for the purposes we have told you about and limited only to those purposes;
- accurate and, where necessary, kept up to date;
- kept only as long as necessary for the purposes we have told you about; and
- kept securely.

4. YOUR RIGHTS AS A DATA SUBJECT

Under the data protection laws, you have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you if that data is inaccurate or incomplete.
- Right to erasure – in certain circumstances you can ask for the data we hold about you to be deleted from our records.
- Right to restriction of processing – where certain conditions apply you have a right to prevent any further processing of your data without it being deleted.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to our processing of your data where this is processing is based on our legitimate interests.
- Right to object to automated processing, including profiling – you also have the right to object to decisions based entirely on a profile of you, and other purely automated decisions. We do not currently undertake any such automated processing.

5. SHARING YOUR INFORMATION WITH THIRD PARTIES

We may share your information with the following third parties:

- Members of our corporate group – group members and their employees may process your information and make use of it as described in section 2 and will abide by this Privacy Policy when they do so.
- Individuals and companies who you have a business relationship with or may be interested in having a business relationship with – for example, if you run a partner website, we may disclose your information to our customers whose products or services you may wish to promote using our technology.
- Companies who process your data only on our behalf, and who are subject to a strict contract.

We may also share your information with other organisations in the following circumstances:

- If the law or a public authority says we must share the information.
- If we need to share your information in order to pursue our legal rights (this includes detecting or preventing fraud and reducing credit risk).
- In connection with a corporate transaction – for example, if our business was sold to another company, they would make use of your information in the same way as us.

6. TRANSFER OUTSIDE THE EUROPEAN ECONOMIC AREA AND/OR UK

Some of the third parties described above operate outside the European Economic Area and/or the UK, and employees of those companies may have access to your information. We have put contracts in place with each of those companies to ensure that your information is still protected when it is processed by those companies. You can obtain a copy of any or all of those contracts by emailing: legal.support@partnerize.com.

7. HOW LONG WILL WE KEEP YOUR INFORMATION

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

8. COOKIE POLICY AND OTHER WEB TECHNOLOGIES

Our website uses the following cookies:

NAME	COMPANY	PURPOSE	LIFETIME OF COOKIE
CONCRETE5	Concrete5	This is a general session cookie set by the content management system (Concrete5) which the site is built on.	Session
_fbp	Facebook	Used to distinguish and keep track of your unique users.	90 days
_ga	Google	Used to distinguish users.	2 years
_gid	Google	Used to distinguish users.	24 hours
_gat	Google	Used to throttle request rate. If Google Analytics is deployed via Google Tag Manager, this cookie will be named <code>_dc_gtm_<property-id></code> .	1 minute
_gat_UA-98405577-1	Google	The main purpose of this cookie is: Performance. Contains campaign related information for the user.	90 days
_gcl_au	Google	Used by Google Analytics to understand user interaction with the website.	3 months
pardot	Pardot	A session cookie denoting an active session and not used for tracking.	Session
visitor_id839113	Pardot	A visitor cookie with a unique identifier. This cookie is used to track and emails, form submissions, page views, file downloads and redirects.	10 years
Visitor_id839113	Pardot	A security cookie that stores a unique hash to make sure that a malicious user can't fake a	10 years

NAME	COMPANY	PURPOSE	LIFETIME OF COOKIE
		visitor and access any corresponding information.	
sliguid	SalesLoft	Provides an anonymous user identifier across multiple requests.	5 years
slirequested	SalesLoft	Once the sliguid cookie has been confirmed against a central server, this cookie is set for every request that comes in.	5 years
slireg	SalesLoft	Identifies the SalesLoft server region that the company data is on.	7 days
sli_token	SalesLoft	This cookie is set when an email recipient clicks through a live web tracking tracked link.	30 days
site_identity	SalesLoft	This cookie is set when an email recipient clicks through a live web tracking tracked link to allow multi-site tracking.	1000 days

What is a cookie?

A cookie is a small amount of data, which often includes a unique identifier that is sent to your computer or mobile phone (referred to here as a "device") browser from a website's computer and is stored on your device's hard drive. Each website can send its own cookie to your browser if your browser's preferences allow it, but (to protect your privacy) your browser only permits a website to access the cookies it has already sent to you, not the cookies sent to you by other sites. Many sites do this whenever a user visits their website in order to track online traffic flows.

Cookies record information about your online preferences and allow us to tailor the website to those preferences. Users have the opportunity to set their devices to accept all cookies, to notify them when a cookie is issued, or not to receive cookies at any time. The last of these means that certain personalised services cannot then be provided to that user and accordingly you may not be able to take full advantage of all of the features of our website. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.

During the course of any visit to our website, the pages you see, along with a cookie, are downloaded to your device. Many websites do this, because cookies enable website partners to do useful things like find out whether the device (and probably its user) has visited the website before. This is done on a repeat visit by checking to see, and finding, the cookie left there on the last visit.

Google Analytics

We use the free Google Analytics tool (see 'How Google uses data when you use our partners' sites or apps' www.google.com/policies/privacy/partners) to collect and analyse website statistics. Google Analytics uses persistent cookies to track data. These cookies are only used for the statistical collection of data such as visits and page hits. Google Analytics' cookies store IP addresses but we cannot link those addresses to any individual or path through the website. Google uses the cookies to read information and evaluate visitors' use of the website in the form of statistical reports that we can access. The Google Analytics' code is incorporated into our website's code so that our website serves the cookies, but Google has access to the cookies. You can stop being tracked by Google Analytics across all websites by going to Google's site at: <http://tools.google.com/dlpage/gaoptout>

Pardot(Salesforce)

We use the Pardot service (see Salesforce's Privacy Policy here: <https://www.salesforce.com/company/privacy/>), which uses cookies to collect information about how visitors use our website and help identify them when they return to our site. We use the information gathered by these cookies to help us improve our website functionality and content, and to customise our marketing communications.

Social Media

Our website includes social media features from Facebook (<https://www.facebook.com/policies/cookies/>), LinkedIn (<https://www.linkedin.com/legal/cookie-policy>), and Twitter (<https://help.twitter.com/en/rules-and-policies/twitter-cookies>). These features may collect your IP address, which page you are visiting on our sites, and may set a cookie to enable the feature to function properly. The cookies and data usage of these features is governed by the privacy policy of the respective social media company.

Withdrawing consent to cookies

Your browser will allow you to adjust your cookie settings to give or withdraw consent. The following information is reproduced below for convenience, and is current as of October 2019:

For Chrome, please see Google's support page here:

<https://support.google.com/chrome/answer/95647>

For Internet Explorer, please see Microsoft's support page here: <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>

For Edge, please see Microsoft's privacy page here: <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy>

For Firefox, please see Mozilla's support page here: <http://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

For Safari, please see Apple's support page here for Macs: <https://support.apple.com/en-gb/HT201265> <https://support.apple.com/kb/PH21411> and here for mobile devices: <https://support.apple.com/en-us/HT201265>

9. DATA PROCESSING SERVICES AND THE PARTNERIZE COOKIE

We are a provider of performance marketing technology services, and process data on our customers' behalf. The processing of that data is not covered by this privacy policy. Our customers use our technology to reward website operators and other marketing partners who have generated sales of the customer's goods or services. In order to enable this, we record your journey from a partner website to the customer site and receive certain information from the customer relating to any subsequent sale. Customers may also request that we record information relating to any advertising you have seen, so that they can reward the partner who displayed that advertising to you. This information is visible to the customer, to us, and usually to the partner who generated the sale/displayed the advertising. Our agreements with our customers prevent us from using that information except as necessary to provide that service to them and to make improvements to it, and as required by law.

It is not possible for us to identify individuals from the data our customers provide to us, nor do we receive credit card or other payment information. Our customers are responsible for communicating with the individuals who provide information to them, and the use of that information is governed by their privacy policies.

We also place the following cookie on your device in order to provide these services:

Name	Process	Lifetime of Cookie
tPHG-PS	Partnerize’s tracking cookie, deployed either upon a user’s clicking of a link on a partner website, or upon the loading of a customer’s image to a partner website.	1 year

This cookie uniquely identifies a user’s browser, allowing us to establish whether the device used to make a purchase has clicked on a partner link or been shown advertising on a partner site. You can disable this cookie by following the guidance in paragraph 8 above.

10. LINKS TO OTHER SITES

Our websites contain hyperlinks to websites owned and operated by third parties. These third-party websites have their own privacy policies, including cookies, and we urge you to review them. They will govern the use of personal data you submit or which are collected by cookies whilst visiting these websites. We do not accept any responsibility or liability for the privacy practices of such third-party websites and your use of such websites is at your own risk.

11. CHANGE TO OUR PRIVACY POLICY

This Privacy Policy may be updated from time to time so you may wish to check it each time you submit information to any of our websites. The date of the most recent revisions will appear on this page.

12. CONTACTING US ABOUT THIS PRIVACY POLICY

If you have any questions or comments about this Privacy Policy please contact a member of our legal team at: Performance Horizon Group Limited, 8th Floor, West One, Forth Banks, Newcastle upon Tyne NE1 3PA.

Tel: 0191 261 2444.

Email: legal.support@partnerize.com