



Privacy Policy



Privacy policy

Table of contents

1.	Purpose and scope of the policy.....	2
2.	Data Controller	2
3.	What Personal Data do we collect and how?.....	2
4.	Why do we collect your Personal Information and how?	3
5.	Do we share your Personal Data?	3
6.	Is your Personal Data transferred to third countries?.....	4
7.	How long do we keep your Personal Data?.....	4
8.	How do we ensure the security of your Personal Information?	4
9.	What are your rights?	4
10.	Updating of this policy	6



Privacy policy

1. Purpose and scope of the policy

Box Marketing attaches the greatest importance and care to the protection of privacy and Personal Data, as well as to the respect of the applicable data privacy legislation (hereinafter "Applicable Legislation"). The Applicable Legislation includes notably the UK General Data Protection Regulation (UK GDPR), tailored by the Data Protection Act 2018.

Under the Applicable Legislation, Personal Data must be processed lawfully, fairly, and transparently. Thus, this privacy policy (hereinafter the "Policy") aims to provide you with simple, clear information on the Processing of your Personal Data, in the context of your browsing and interactions with our website.

2. Data Controller

In the course of your activity on the Box Marketing website, we collect and use Personal Data relating to you, an individual (hereinafter "Data Subject").

For all the Processing activities, Box Marketing, Registered in England and Wales No: 04521294. Registered Address: 2-4 Packhorse Road, Gerrards Cross, Buckinghamshire, England, SL9 7QE, determines the means and purposes of the Processing. Thus, within the meaning of the Applicable Legislation, we act as a data controller.

3. What Personal Data do we collect and how?

By using our website, or by subscribing to our services/association you provide us with a certain amount of information about yourself, some of which may be used to identify you ("Personal Data"). This is the case when you browse our site, when you fill in online forms, or simply when you become a member.

The nature of the Personal Data collected will vary depending on the relationship you have with Box Marketing, the main ones being:

- **Identification data:** This includes all the information that would allow us to directly identify you, such as your name, first name, telephone number. We may also collect your e-mail address, as well as your postal address (in case of payment, the postal address will be needed to generate an invoice).
In case of subscription, proof of identity may also be requested.
- **Authentication data:** This is all the information you provide us to access your personal account, such as your password, and other information necessary to authenticate and access an account.
We also collect your IP address for maintenance and statistical purposes.
- **Financial data:** this corresponds to banking data such as bank details.

Privacy policy

- **Documents of all kinds** (PDF, Microsoft Office, Image) with titles, contents, folder names, or information related to a document, such as comments written in the documents and reminder dates.
- **Browsing information:** by browsing our website, you interact with it. As a result, some information about your browsing is collected.
- **Data collected from Third Parties:** Personal Data that you have agreed to share with us or on publicly available social networks and/or that we may collect from other publicly available databases.

4. Why do we collect your Personal Information and how?

We collect your Personal Data for specific purposes and on different legal grounds.

Purposes	Legal Basis	Retention period
Management of Contact Form	Legitimate interest	5 years after the end of the client contract
Management of communications about products and services	Consent	Indefinitely (or consent is removed)
Management of Recruitment	Contract	6 months for unsuccessful Recruitment 6 years after the end of the employment.
Management of Clients	Contract	5 years after the end of the client contract
Management of potential clients and prospects	Legitimate interest	3 Years

5. Do we share your Personal Data?

Your Personal Data is intended for the authorized Box Marketing collaborators in charge of the management and the execution of the contracts and legal obligations, according to the purposes of the collection and within the limits of their respective attributions.

It may be transmitted for certain tasks related to hereabove purposes, and within the limits of their respective missions and authorizations, to the following recipients:

- Service providers and processors that we use to carry out a range of operations and tasks on our behalf, including Indigo and HubSpot.
- Duly authorized public authorities (judicial, control...), in the framework of our legal and regulatory obligations.
- Regulated professions (lawyers, bailiffs, etc...) who may intervene in the context of the implementation of guarantees, debt collection, or litigation.

When your Data is provided to our service providers and processors, they are also required not to use the Personal Data for purposes other than those originally intended. We make every effort to ensure that these third parties maintain the confidentiality and security of your Personal Data.

In all cases, only the necessary Personal Data is provided. We make every effort to ensure the secure communication or transmission of your Personal Data.

We do not sell your Personal Data.



Privacy policy

6. Is your Personal Data transferred to third countries?

Box Marketing strives to keep the Personal Data in the United Kingdom, or at least within the European Economic Area (EEA).

However, it is possible that the Personal Data we collect when you use our platform or services may be transferred to other countries. This is for example the case if some of our service providers are located outside the European Economic Area.

In the event of such a transfer, we guarantee that it will be carried out:

- to a country ensuring an adequate level of protection, i.e. a level of protection equivalent to what the European privacy regulations require; or
- within the framework of standard contractual clauses; or
- within the framework of Binding Corporate Rules.

7. How long do we keep your Personal Data?

We retain your Personal Data only for as long as is necessary to fulfill the purpose for which we hold the data, notably to meet your needs or our legal obligations.

Retention times vary depending on several factors, such as:

- Box Marketing business needs.
- Contractual requirements.
- Legal requirements.
- Recommendations from regulatory authorities.

8. How do we ensure the security of your Personal Information?

Box Marketing is committed to protecting the Personal Data we collect and process from loss and unauthorized destruction, alteration, access, or disclosure.

Thus, we implement all appropriate technical and organizational measures, depending on the nature of the Personal Data and the risks that their processing entails. These measures must preserve the security and confidentiality of your Personal Data. They may include practices such as limiting access to Personal Data on a need-to-know basis, pseudonymization or encryption.

In addition, our practices, policies, and security measures (secure access, authentication process, backup, software, etc.) are regularly reviewed and updated as necessary.

9. What are your rights?

The Applicable Legislation provides Data Subjects with rights that they can exercise. Thus, are provided:

Privacy policy

1. **Right to information:** the right to have clear, precise, and complete information on the use of your Personal Data by Box Marketing.
2. **Right of access:** the right to obtain a copy of the Personal Data that the Data Controller holds on the requester.
3. **Right to rectification:** the right to have Personal Data rectified if they are inaccurate or obsolete and/or to complete them if they are incomplete.
4. **Right to erasure / right to be forgotten:** the right, to have your Personal Data erased or deleted, unless Box Marketing has a legitimate interest in keeping it.
5. **Right to object:** the right, under certain conditions, to object to the processing of Personal Data by Box Marketing for reasons related to the particular situation of the requester.
6. **Right to Withdraw Consent:** the right to withdraw Consent at any time where the processing is based on your consent.
7. **Right to the restriction of processing:** the right, under certain conditions, to request that the processing of Personal Data be suspended.
8. **Right to Data Portability:** the right to request that Personal Data be transmitted in a reusable format that allows it to be used in another database.
9. **Right not to be subject to a decision based solely on automated processing:** the right of the requester to refuse fully automated decision-making and/or to exercise the additional safeguards offered in this regard.

Additional rights may be granted to Data Subjects by local legislation.

In order to facilitate the exercise of these rights, Box Marketing has implemented a **procedure for the management of data subjects' rights** in accordance with the requirements of the Applicable Legislation. This procedure lays out:

- the standards to be respected to ensure the transparent information of data subjects.
- the applicable legal requirements.
- the modalities for exercising each right, depending on the category of Data Subjects.
- The business processes for handling these requests in accordance with the above requirements.
- The stakeholders involved in these processes, their roles, and responsibilities.

To exercise your rights, you may contact the Data Protection Officer (DPO) externalisation@dpo-consulting.com or Box Marketing, Oxford House, Oxford Road, Thame, OX9 2AH

When you send us a request to exercise a right, please specify as far as possible the scope of the request, the type of right being exercised, the concerned data processing activity, and any other useful information in order to facilitate the examination of your request. In addition, in case of reasonable doubt, you may be asked to prove your identity.



Privacy policy

You also have the right to complain to the Information Commissioner's Office , Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF about the way in which Box Marketing collects and processes your data.

10. Updating of this policy

This Policy may be updated from time to time to reflect changes in the Applicable Legislation.

Date of last update 11/03/2024