

Privacy Policy

Gravity Media Group Limited, trading as Gravity Media ("We", "Us", "Our") are committed to protecting and respecting your privacy. Gravity Media Holdings Limited issues this statement on behalf of its group of companies that trade under Gravity Media.

This Privacy Policy (together with our <u>terms of use</u> and any other documents referred to) the **Policy**, sets out the basis on which we process any personal data we collect from you, or that you provide to us. Please read the following carefully. By visiting <u>www.gravitymedia.co.uk</u> (**our site**) you are accepting and consenting to the practices described in this Policy.

We also have a <u>Recruitment Privacy Policy</u> which describes how we process your data in relation to applying for a role at Gravity Media.

For the purpose of the UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018, and other relevant legislation, the data controller is Gravity Media Group Limited of 32-34 Greenhill Crescent, Watford Business Park, Watford, Herts WD18 8JU, company number 03879766. If you have any queries relating to Our use of your personal data or any other related data protection questions, please contact Our data protection team by using the following email address: grp-uk-data_protect@gravitymedia.com

Our site may, from time to time, contain links to and from the websites of, third parties, our partner networks, advertisers and affiliates, 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.

The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.



- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Profile Data includes purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our website, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

How do we collect data

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our products or services;
- create an account on our website;
- subscribe to our service or publications;
- · request marketing to be sent to you;
- Your contact with us, such as via an email or letter sent, or through our chat platform;



- enter a competition, promotion or survey; or
- give us some feedback.

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.

This website is using Tidio, a chat platform that connects users with the customer support of Gravity Media. We are collecting email addresses, names, and region location, only with the consent of the users, in order to start the chat. The messages and data exchanged are stored within the Tidio application. For more information, please refer to their Privacy Policy. Gravity Media is not making use of these messages or data other than to follow up on users' registered issues or inquiries. Your personal data will be processed and transmitted in accordance with the UK GDPR.

Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from the following parties: analytics providers, advertising networks and search information providers, based inside and outside the EU.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
- Identity and Contact Data from data brokers or aggregators and from publicly availably sources such as Companies House and the Electoral Register based inside the EU.

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message or in relation to the use of our chat platform. You have the right to withdraw consent to marketing at any time by contacting us.



Data retention

We will only keep your personal data for as long as We are either required to do so by law, or as is required to fulfil the purposes for which it was collected.

We maintain a data retention policy to meet Our data protection obligations in this respect. Please contact Our data protection team by using the following email address: grp-uk-data_protect@gravitymedia.com or any questions or information which you may have in this regard.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have opted in to receiving such communications when you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion.

Third-party marketing



Gravity Media Holdings Limited is part of the Gravity Media companies. We will get your express opt-in consent before we share your personal data with any company outside of the Gravity Media companies for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Disclosure of your information

You agree that we have the right to share your personal information with:

- Any other company within Gravity Media.
- Selected third parties including: business partners, suppliers and sub-contractors
 for the performance of any contract we enter into with you, analytics and search
 engine providers that assist us in the improvement and optimisation of our site;
 and credit reference agencies for the purpose of assessing your credit score
 where this is a condition of us entering into a contract with you.
 - o If Gravity Media Group Limited is acquired by a third party, we will disclose your personal data to the prospective seller or buyer.
 - o If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or terms and conditions of supply and other agreements; or to protect the rights, property, or safety of Gravity Media Group Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Where we store your personal data

The data that we collect from you will be transferred to, and stored at, a destination outside the European Economic Area ("EEA").



In the course of carrying out the activities referred to above, We may also transfer your data to other countries, which may not have the same legal protections for your data as the UK or Europe. In such cases, We will take steps to ensure that your personal data is adequately protected in accordance with the applicable UK GDPR or EU GDPR legal requirements (whether that is the use of standard contractual clauses which have been approved for such purposes, binding corporate rules or other permitted transfer mechanisms).

All information you provide to us is stored on our secure servers.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Your rights to:

You have the following specific rights in respect of the personal data which We process:

- 1. **The right to be informed** about how We use personal data. This Policy satisfies that right by explaining who We are; the purposes for which We process personal data and Our lawful basis in so doing; the categories of data We process; third party disclosures; and details of any transfers of personal data outside the UK and the EEA.
- 2. The right of access to the personal data which We hold. In most cases this will be free of charge and must be provided within one month of receipt. To obtain a copy of the personal data We hold on you, please write to Us and provide Us with your details or email grp-uk-data_protect@gravitymedia.com. There are some exemptions to this right, which means you may not always receive all the information which We process.
- 3. **The right to rectification** where data is inaccurate or incomplete. In such cases We shall make any amendments or additions within one month of your request.
- 4. The right to erasure of personal data, which can arise, for example if you withdraw your consent to process your personal data and there is no other legitimate reason for continuing to process that personal data. Other specific circumstances include where the personal data is no longer necessary in relation to the purposes for which it was originally collected or processed, or when you object to the processing and there is no overriding legitimate interest for continuing the processing.
- 5. **The right to restrict processing**. You can ask Us to temporarily limit the use of your personal data whilst We are considering: a challenge which you have made to



the accuracy of your personal data; or an objection which you have made to the use of your personal data. You can also ask Us to limit the use of your personal data rather than delete it, if: We processed your personal data unlawfully but you do not want it deleted; or We no longer need your personal data but you want Us to keep it in order to create, exercise or defend legal claims.

- 6. The right to data portability only applies to information which you have given Us. You have the right to ask that We transfer the information which you gave Us from one organisation to another, or give it to you. The right only applies if We are processing your personal data based on your consent or under, or in talks about entering into a contract and the processing is automated.
- 7. **The right to object** in cases where processing is based on legitimate interests, where: Our requirement to process your personal data is overridden by your interests; or where the legitimate interest were for the purposes of direct marketing.
- 8. The right to withdraw consent. Where you have provided consent to Our use of your personal data you may withdraw your consent by clicking 'unsubscribe' on any of Our marketing emails, or by informing Us by emailing Us at grp-uk-data_protect@gravitymedia.com. Once you have withdrawn your consent, We will no longer process your personal data for the purposes for which you had originally consented. You should note that as a result We may be unable to provide you with certain services which relied on the processing for which you withdrew consent.

Contact details

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO by grp-uk-data_protect@gravitymedia.com or +44 20 3104 0000. Any changes we make to this Policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our Policy.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Updates to this policy

This policy will be kept under continual review, and changes may be made from time to time.

Updated on: 05 April 2023