

## PRIVACY POLICY

Circle Media Group is a brandname of CirclePrintes Holding B.V. CirclePrintes Holding B.V. ("We" or "Us" or "Our") are committed to protecting and respecting your privacy.

This policy (together with Our Terms and Conditions which can be found at <http://www.circlemediagroup.com> and any other documents referred to on it) sets out the basis on which any personal data We collect from you, or that you provide to Us, will be processed by Us. Please read the following carefully to understand Our views and practices regarding your personal data and how We will treat it.

By visiting Our Site, and/or using the Services offered on or through Our Site, you agree to the terms of this Privacy Policy as it may be amended from time to time. As We update and expand our Services, this Privacy Policy may change, so check back to this page from time to time. This Privacy Policy is incorporated into, and part of, the Terms and Conditions of Our Site, which governs your use of our Site.

You may opt in or opt out of Our sharing of your personal information with third parties for marketing purposes by following the directions in the "Your Rights" section below.

For the purpose of the Data Protection Act 1998 (the Act), the data controller is CirclePrintes Holding B.V. of 4 Stroombaan, Amstelveen, 1181 VX, The Netherlands.

## INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- Information that you provide by filling in forms on Our site [www.circlemediagroup.com](http://www.circlemediagroup.com) or associated sites (Our Site). This includes information provided at the time of registering to use Our Site, subscribing to Our service, posting material or requesting further services including, for example, name, home and/or business address, email address, telephone number, and/or other information that may identify you as an individual. We may also ask you for information when you enter a competition or promotion sponsored by Us, sign-up for e-mail newsletters and when you report a problem with Our site.
- If you contact Us, We may keep a record of that correspondence.
- We may also ask you to complete surveys that We use for research purposes, although you do not have to respond to them.
- Details of (if applicable) transactions you carry out through Our site and of the fulfilment of your orders.
- Details of your visits to Our site including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for Our own billing purposes or otherwise and the resources that you access.
- Your user generated content.

## IP ADDRESSES, COOKIES AND GIFS

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to Our advertisers. This is statistical data about Our users' browsing actions and patterns, and does not identify any individual.

For the same reason, We may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help Us to improve Our Site and to deliver a better and more personalised service. They enable Us:

- To estimate Our audience size and usage pattern.
- To store information about your preferences, and so allow Us to customise Our Site according to your individual interests.
- To speed up your searches.
- To recognise you when you return to Our Site.

You can control how your browser handles Cookies received from websites. You can choose to refuse all Cookies, or to be prompted before a Cookie is saved to your hard drive, or to only

accept Cookies from certain websites that you designate. By refusing to accept cookies from Us, you may not be able to use some of the features and functionality available on Our Site.

We may use "clear GIFs" (aka "Web beacons" or "pixel tags") or similar technologies, in Our Site and/or in our communications with you to enable Us to know whether you have visited a web page or received a message. A clear GIF is typically a one-pixel, transparent image (although it can be a visible image as well), located on a web page or in an e-mail that communicates to Us whether you viewed an email that We sent you or visited a certain page on Our Site. A clear GIF may enable Us to relate your viewing or receipt of a web page or message to other information about you, including your Personal Data.

Our server automatically collects data about your server's internet address when you visit Us. This information, known as an Internet Protocol address, or IP Address, is a number that's automatically assigned to your computer by your internet service provider whenever you're on the internet. When you request pages from Our Site, Our servers may log your IP Address and sometimes your domain name. Our server may also record the referring page that linked you to Us (e.g., another website or a search engine); the pages you visit on Our Site; the website you visit after Our Site; the ads you see and/or click on; other information about the type of web browser, computer, platform, related software and settings you are using; any search terms you have entered on Our Site or a referral site; and other web usage activity and data logged by Our web servers. We use this information for internal system administration, to help diagnose problems with Our server, and to administer Our Site. Such information may also be used to gather broad demographic information, such as country of origin and internet service provider. Any or all of activities with regard to our Site usage information may be performed on our behalf by our services providers.

#### **WHERE WE STORE YOUR PERSONAL DATA**

The data that We collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for Us or for one of Our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to Us is stored on Our secure servers which may be located outside the EEA. Where We have given you (or where you have chosen) a password which enables you to access certain parts of Our Site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. As a result, 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 reasonable procedures and security features to try to prevent unauthorised access. If you contact Us by email or a "contact us" or similar feature on Our Site, you should be aware that your transmission might not be secure. A third party could view information you send by these methods in transit.

You agree to (a) immediately notify Us of any unauthorised use of your password or account or any other breach of security, and (b) ensure that you exit from your account at the end of each session. It is your responsibility to control the dissemination and use of your password, control access to and use of your account, and notify Us when you desire to cancel your account on this Site. We are not responsible or liable for any loss or damage arising from your failure to comply with this provision.

We will not be liable for disclosure of your information due to errors or unauthorised acts of third parties during or after transmission.

We recommend that you change your password from time to time. If you are using a public computer (e.g. at a library), or a shared computer, We urge you to log out of your account and Our Site altogether, and quit the browser application before you leave the computer. This will help prevent others from accessing your account and any personal information.

In the unlikely event that We believe that the security of your personal information in Our possession or control may have been compromised, We may seek to notify you of that development. If a notification is appropriate, We would endeavour to do so as promptly as possible under the circumstances, and, to the extent We have your e-mail address, We may notify you by e-mail. You hereby consent to Our use of e-mail as a means of such notification.

## **USES MADE OF THE INFORMATION**

We use information held about you in the following ways:

- To ensure that content from Our Site is presented in the most effective manner for you and for your computer.
- To provide you with information, products or services that you request from Us or which We feel may interest you, where you have consented to be contacted for such purposes.
- To carry out Our obligations arising from any contracts entered into between you and Us.
- To allow you to participate in interactive features of Our service, when you choose to do so.
- To notify you about changes to Our service. We may also use your data, or permit selected third parties to use your data, to provide you with information about goods and services which may be of interest to you and We or they may contact you about these by post or telephone.

## **SERVICE PROVIDERS**

We may use third-party partners to help operate Our Site and deliver Our products and services, and may share your information with Our affiliates, service providers and other third parties that provide products or services for or through this Site or for Our business (such as website or database hosting companies, address list hosting companies, e-mail service providers, analytics companies, distribution companies, fulfilment companies, and other similar service providers that use such information on Our behalf).

We reserve the right to use the contents of any email, letter, postcard, voicemail, or other communication sent to Us for any purpose, other than an actual order for product. The communication shall be Our property and may be used without restriction for marketing, promotions, or for other commercial use. If you review or download information, We track the visit to give Us information about which part of the site is frequented. In addition, we may send you notices (for example, in the form of e-mails, SMS, mailings, and the like), and otherwise correspond with you, about products, services, companies and events, sponsored by us and others, that We think might interest you. If you are a new customer, and where We permit selected third parties to use your data, We (or they) will contact you by electronic means only if you have consented to this. We may disclose aggregate statistics regarding user behaviour as a measure of interest in, and use of, Our Site and e-mails to third parties in the form of aggregate data, such as overall patterns or demographic reports that do not describe or identify any individual user. If you do not want Us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which We collect your data. You can also opt out pursuant to the section below entitled "Your Rights." We may use your information to communicate with you regarding the status of your events. You may opt out of receiving any such messages at any time.

## **DISCLOSURE OF YOUR INFORMATION**

Your privacy is important to Us. We may disclose your personal information to any member of Our group, which means Our subsidiaries, Our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We may use your personal data that you provide to Our Site, for example, to respond to your requests and to provide you with Our product and Service offerings. We may also use your personal information to maintain Our internal record keeping and/or share it with Our affiliates for internal marketing or other purposes. In addition, We may send you notices (for example, in the form of e-mails, mailings, and the like), and otherwise correspond with you, about products, services, companies and events, sponsored by Us and others, that We think might interest you.

We may disclose your personal information to third parties:

- In the event that We sell or buy any business or assets, in which case We may disclose your personal data to the prospective seller or buyer of such business or assets.
- If CirclePrintes Holding B.V. or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- 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 and Conditions and other

agreements; or to protect the rights, property, or safety of CirclePrintes Holding B.V., Our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We may disclose user information to government authorities, and to other third parties when compelled to do so by government authorities or otherwise as required or permitted by law, including but not limited to in response to court orders and subpoenas. We also may disclose user information when We have reason to believe that someone is causing injury to or interference with our rights or property, other users of Our Site, or anyone else that could be harmed by such activities. Additionally, We cooperate with law enforcement inquiries and other third parties to enforce laws, intellectual property rights and other rights.

While We will take reasonable precautions to protect the security and integrity of Personal Data provided to Our Site, due to the inherent nature of the internet as an open global communications vehicle, We cannot guarantee that information, during transmission through the internet or while stored on Our system or otherwise in Our care, will be absolutely safe from intrusion by others, such as hackers. We maintain physical, electronic and procedural safeguards to protect your Personal Data.

## **YOUR RIGHTS**

You have the right to ask Us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if We intend to use your data for such purposes or if We intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms We use to collect your data.

You have the right to "opt in" and "opt out" of certain uses of your personal data. For example, at the time you are requested to provide personal information on the Site, you may have the opportunity to elect to, or not to (1) receive correspondence from Us, or (2) have your personal information shared with other entities for their marketing purposes.

Please understand that if you opt out of receiving promotional correspondence from Us, We may still contact you in connection with your relationship, activities, transactions and communications with Us. Also, a request to have Us stop sharing your personal information with other entities for marketing purposes will only apply as of the date of your request, and We will not be responsible for any communications that you may receive from entities that received your personal information prior to such request. In these cases, please contact that entity directly. You can also exercise the right at any time by contacting Us at CirclePrintes Holding B.V. of 4 Stroombaan, Amstelveen, 1181 VX, The Netherlands OR [info@circlemediagroup.com](mailto:info@circlemediagroup.com).

Our Site may, from time to time, contain links to and from the websites of Our partner networks 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 or Content contained on this Site. Please check these policies before you submit any personal data to these websites.

## **ACCESS TO INFORMATION**

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Public and Interactive Areas of Our Site We may from time to time provide interactive services on Our Site, including, without limitation bulletin / information boards and discussion groups. We are under no obligation to oversee, monitor or moderate any interactive service we provide on Our Site, and We expressly exclude all liability for any loss or damage arising from the use of any interactive service by a user, whether the service is moderated or not. Similarly, We may or may not exercise editorial control over the content of any such interactive services. As a result, you may be exposed to content that is inaccurate, fraudulent or deceptive or that you find offensive or objectionable. However, We reserve the right, but are not obliged, to monitor Our interactive services and to remove or alter any content, which We consider, in Our sole discretion, constitutes a misuse. We may restrict, suspend or terminate your use of these services or Our Site where We believe that there has been such a misuse. Your use of such interactive services is at your own risk. Personal Data that you post on or through the public areas of Our Site are generally accessible to, and may be collected and used by, others and may result in unsolicited messages or other contact from others. You should not provide Personal Data about yourself in public or interactive areas of Our Site. Such Personal Data is not covered under this Privacy Policy.

You represent and warrant that content, information or other material posted by you

(collectively, "Postings") are original to you, do not infringe on a third party's intellectual property rights, are not obscene, vulgar, offensive, malicious, discriminatory, defamatory or otherwise unlawful, that no other party has any rights thereto, and that any "moral rights" in your Postings have been waived. We may delete or destroy your Postings at any time in Our sole discretion.

#### **CHANGES TO OUR PRIVACY POLICY**

Any changes We may make to Our privacy policy in the future will be posted on this page and, effective upon posting. Under certain circumstances, We may also elect to have such changes notified to you by e-mail or by posting a notice on the front page of Our Site.

#### **CONTACT**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to CirclePrintes Holding B.V. of 4 Stroombaan, Amstelveen, 1181 VX, The Netherlands OR [info@circlemediagroup.com](mailto:info@circlemediagroup.com).

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