

FUTERRA

INTRODUCTION

Welcome to the Futerra Sustainability Communications Limited (“Futerra”) privacy notice.

Futerra respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) or when you provide us with your personal details and tells you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary at the back of the notice to understand the meaning of some of the terms used in this privacy notice.

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1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how Futerra collects and processes your personal data through your use of our website, your participating in a survey or environmental or sustainability campaign and any data you may provide when you sign up to our newsletter.

This website is not intended for children and we do not knowingly collect data relating to children.

CONTROLLER

Futerra Sustainability Communications Limited is the controller and responsible for your personal data (referred to as “Futerra”, “we”, “us” or “our” in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

CONTACT DETAILS

You can contact our Data Privacy Manager at:

Post: Futerra Sustainability Communications Limited
3rd Floor
8-11 Vine Hill
London, UK
EC1R 5DX

FAO: Data Privacy Manager

Email: DataPrivacy@wearefuterra.com

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.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on [DATE] and historic versions can be obtained by contacting us. From time to time we may update this privacy notice to remain compliant with applicable data protection laws so please check back here for updates.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. 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, payroll number, staff number, emergency contact first name and last name.
- **Contact Data** includes billing address, delivery address, email address, telephone numbers and emergency contact telephone numbers.
- **Special Category of Personal Data** includes political opinions or beliefs.
- **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.

- **Usage Data** includes information about how you use our website 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 **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, trade union membership, information about your health and genetic and biometric data) except for your political beliefs in support of a sustainability or environmental campaign. We have taken all necessary steps to ensure this category of personal data is as secure as all other categories of personal data of yours that we process. See section 8 for further information on Data Security.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

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

- **Direct interactions.** You may give us your Identity, Contact and Marketing and Communications Data by filling in forms, submitting information on one of our websites or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - subscribe to our newsletter;
 - enter a campaign or survey;
 - take part in a Futerra event.
- **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. Please see our cookie policy below.

4. HOW WE USE COOKIES

- A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.
- We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.
- Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

5. 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 have your consent.
- 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.

You have the right to withdraw consent to marketing at any time by unsubscribing via the link provided with each marketing email we send to your or by contacting us on dataprivacy@wearefuterra.com.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy notice</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Marketing and Communications</p>	<p>(a) Necessary to comply with a legal obligation</p> <p>(b) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p> <p>(c) Consent</p>
<p>To enable you to participate in a sustainability or environmental campaign (such as the Climate Optimist campaign)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Usage</p> <p>(d) Marketing and Communications</p>	<p>(a) Necessary for our legitimate interests (to study how participants in surveys or campaigns use our website)</p> <p>(b) Consent</p>
<p>To enable record and store your image</p>	<p>(a) Identity</p>	<p>(a) Consent</p>

and likeness in a video interview on sustainability issues for use on social media channels	(b) Contact	(b) Necessary for our legitimate interests (to help promote sustainability issues)
To enable us to send you a newsletter by email	(a) Identity (b) Contact (c) Marketing and Communications	(a) Consent
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, marketing, client relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of clients for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

OPTING OUT

You can ask us to stop sending you marketing messages at any time following the opt-out links on any marketing message sent to you or by contacting us.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

OPTING IN TO AN ENVIRONMENTAL OR SUSTAINABILITY CAMPAIGN

Futerra is the data controller for purposes of personal data processing in relation to participating in an environmental or sustainability campaign that is sponsored by Futerra on this or any other website. Participants in the campaign that have opt-in to the campaign and / or consented to receive email updates about the campaign will therefore have their data processed in accordance with this privacy policy.

By participating in a campaign you are confirming to us your participation in a global campaign to help raise awareness of environmental and sustainability issues. If you choose to provide us with your email address and opt-in to receive campaign updates, we'll use your email address to occasionally send you updates on campaign updates, and you'll always have a chance to unsubscribe from these emails. We will always provide you with specific information about how we will use your information in support of a campaign if you participate on one.

6. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- External Third Parties as set out in the *Glossary*.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

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.

7. INTERNATIONAL TRANSFERS

Some of our external third parties are based in the USA, outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield_en

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

8. 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.

9. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data 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.

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, and the applicable legal requirements.

We keep contact information that you have indicated you are happy for us to have in order to keep you up to date with newsletters and campaign updates and will keep this information until such time as you indicate you no longer wish us to keep this data, or for seven years following your most recent active interaction with us (e.g. clicking a link on an email we send you, taking you to our site), whichever of these two is shorter. We will keep information about your participation in a sustainability or environmental campaign for as long as that information will serve the campaign or until you ask us to remove your information from the campaign database. We will always provide you with specific information about how long we will keep your information in relation to a campaign before you opt-in to the campaign.

In some circumstances you can ask us to delete your data: see [Request erasure](#) below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

10. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- [Request access to your personal data.](#)
- [Request correction of your personal data.](#)
- [Request erasure of your personal data.](#)
- [Object to processing of your personal data.](#)
- [Request restriction of processing your personal data.](#)
- [Right to opt-out of automated profiling of your personal data.](#)
- [Request transfer of your personal data.](#)
- [Right to withdraw consent.](#)

If you wish to exercise any of the rights set out above, [please contact us](#).

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

11. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Consent means you have explicitly given us permission to process your personal data. In such circumstances we will have asked you a specific question and you will have entered information or ticked a tick-box to indicate your consent.

THIRD PARTIES

EXTERNAL THIRD PARTIES

- Any member of our group, which means our subsidiaries or related companies.
- Campaign partners
- Service providers acting as processors based in the UK or EU who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK and EU who provide consultancy, banking, legal, insurance and accounting services.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate

data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it. In such circumstances we may reserve the right to delete your personal data rather than hold it but restrict processing, where our processes are not set up to enable a restriction.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Request to opt out of automated profiling of your personal data. You have the legal right to opt-out of any automated profiling of your personal data that could have a legal consequence for you, and have a human being involved in the processing decision rather than it being automated.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.