

Privacy policy

Introduction

This Policy is issued on behalf of the MEPC Milton GP Ltd, so when we mention “MEPC”, “we”, “us” or “our” in this Policy, we are referring to the company with its registered office at Sixth Floor, 150 Cheapside, London EC2V 6ET is the controller and responsible for the company’s websites.

MEPC Milton GP Ltd respects your privacy and is committed to protecting your personal data. This Policy will inform you as to how we look after your personal data when you visit groupeither of the Milton Park websites, which are:

www.miltonpark.co.uk/ www.miltonpark.com
www.bee-house.co.uk

In this Policy, “Website” means the relevant website that you are accessing and to which you are providing your personal data.

This Policy also tells you about your privacy rights and how the law protects you.

Please read this Policy carefully as it contains important information.

1. Important information

This Policy aims to give you information on how the MEPC Milton GP Ltd collects and processes your personal data through use of the Website, including any data you may provide through the Website when you sign up to a newsletter or use our “contact us” page, or if you take part in a competition.

It is important that you read this Policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Policy supplements other notices and privacy policies and is not intended to override them.

How to contact us

Please contact us if you have any questions about this Policy or the information we hold about you.

If you wish to contact us please send an email to enquiries@mepc.com, write to MEPC Milton Park, Bee House, 140 Eastern Avenue, Milton Park, Oxfordshire OX14 4SB or call +44 (0)1235 865555.

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

Changes to this Policy and your duty to inform us of changes

We keep this Policy under regular review and we may change it from time to time. This Policy was last updated in October 2022.

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

The 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 the Website, we encourage you to read the privacy policy 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 as follows:

- **Identity Data** includes first name, last name and title.
- **Contact Data** includes address, email address and telephone numbers.
- **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 the Website.

- **Usage Data** includes information about how you use the Website.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

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). We also do not collect any information about criminal convictions and offences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will 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 Policy.

3. How your personal data is collected

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

- **Direct interactions.** You may give us your personal data by filling in forms on the Website or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - subscribe to our publications or newsletters through the Website;
 - request marketing to be sent to you through the Website;
 - enter a competition, promotion or survey through the Website; or
 - give us feedback or contact us by any media.
- **Automated technologies or interactions.** As you interact with the Website, we will 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.
- **Third parties or publicly available sources.** We will receive Technical Data about you from various third parties as set out below:
 - Analytics providers such as Google based outside the UK
 - Analytics providers such as Lead Forensics and Leadfeeder based outside the UK.

4. How we use your personal information

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 you have consented before processing.
- 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 obligation.

We will only send you direct marketing communications by email or text if we have your consent.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes. You have the right to withdraw consent to marketing at any time by contacting us.

5. 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
To register you to receive our newsletter	(a) Identity (b) Contact	Performance of a contract with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or this Policy (b) Asking you to leave a review or take a survey (c) Communicating with you where you have contacted us	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/ services)

Purpose/ Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To enable you to apply to attend an event, or partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/ services, to develop them and grow our business)
To administer and protect our business and the 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 deliver relevant Website content to you and measure or understand its effectiveness	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/ services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve the Website, our products/ services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep the Website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about developments or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

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 requested information from us and you have not opted out of receiving that marketing.

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

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.

6. Who we share your personal information with

We may share your personal information with members of the MEPC Milton GP Ltd and the following third parties to help us provide our services to you:

- HubSpot based in Cambridge, Massachusetts and Mailchimp based in Atlanta, Georgia for customer relationship management and newsletter distribution;
- Lead Forensics based in Atlanta, Georgia and Leadfeeder based in Helsinki, Finland for reverse IP tracking;
- EventBrite based in San Francisco, California for event management; and
- Thought Quarter based in Redruth, Cornwall for hosting the Website.

We may also share your personal information with third parties 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 Policy.

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.

We will share personal information with law enforcement or other authorities if required by applicable law.

7. How long your personal information will be kept

We will hold your personal information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements but in any event no longer than six years following your first contact with us (unless we are required to hold it for longer to comply with a legal requirement or for our legitimate business purposes).

8. Transfer of your information out of the EEA

Many of our external third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, 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; or
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

9. Your rights

Under the data protection laws, you have a number of important rights free of charge. You can:

- request access to your personal information and to certain other supplementary information that this Policy is already designed to address;
- request us to correct any mistakes in your information which we hold;
- request the erasure of personal information concerning you in certain situations;
- object at any time to processing of personal information;
- request restriction of our processing of your personal information in certain circumstances;
- request a transfer of your personal data to another controller; and
- withdraw your consent to processing, where that is the basis of our processing of your personal data.

If you would like to exercise any of those rights, please email, call or write to us (see 'How to contact us' in paragraph 1 above), giving us enough information to identify you

e.g. name and work email address, let us have proof of your identity (a copy of your driving licence or passport), and let us know the information to which your request relates.

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 could refuse to comply with your request in these circumstances.

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.

We try to respond to all legitimate requests within one month. Occasionally it could 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.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) at <https://ico.org.uk/your-data-matters/>.

10. Cookies

We use cookies to help you navigate efficiently and perform certain functions. You will find detailed information about all cookies under each consent category below.

The cookies that are categorised as “Necessary” are stored on your browser as they are essential for enabling the basic functionalities of the site.

We also use third-party cookies that help us analyse how you use this Website, store your preferences and provide the content and advertisements that are relevant to you. These cookies will only be stored in your browser with your prior consent.

You can choose to enable or disable some or all of these cookies but disabling some of them may affect your browsing experience.

- **Functional** - These cookies are used to provide you with a more personalised experience on our Website and to remember choices you make when you use our Website. For example, we may use functionality cookies to remember your language preferences or remember your login details.
- **Necessary** - These cookies are essential to provide you with services available

through our website and to enable you to use certain features of our Website. Without these cookies, we cannot provide you certain services on our Website.

- **Analytics** - These items help the website operator understand how its Website performs, how visitors interact with the site and whether there may be technical issues. This storage type usually doesn't collect information that identifies a visitor.
- **Personalisation** - These items allow the website to remember choices you make (such as your user name, language, or the region you are in) and provide enhanced, more personal features. For example, a website may provide you with local weather reports or traffic news by storing data about your current location.
- **Advertising** - These items are used to deliver advertising that is more relevant to you and your interests. They may also be used to limit the number of times you see an advertisement and measure the effectiveness of advertising campaigns. Advertising networks usually place them with the website operator's permission.

11. Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

We use the latest Secure Server Technology to ensure that all data submitted through the Website is protected to the highest standards.