

## Privacy Notice

Last updated: October 2022

### About this Privacy Notice

Signal Media Limited ('**Signal**', '**we**' or '**us**') is registered in England and Wales under company number 08468207 and has its registered office at 1st Floor Sackville House, 143-149 Fenchurch Street, London, England, EC3M 6BM. We respect your right to privacy and are committed to protecting the privacy and security of your personal information. This Privacy Notice explains who we are, how we collect, share and use personal information about you, and how you can exercise your privacy rights. If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Privacy Notice.

This notice applies to any clients / prospective clients or those that enquire about the services Signal provides or use of our website, this may include instances where you fill in forms on our website, enter into a competition we're running, complete one of our surveys, or otherwise where you correspond with us directly by phone/email. If you are a social media user and wish to find out more about how we process personal data from social media platforms, please see our [Social Content Privacy Policy](#).

### What does Signal do?

Signal is the leading AI-driven global solution provider for real-time unlimited information and insights for media monitoring, reputation management, and market intelligence.

For more information about Signal, please see our website <https://www.signal-ai.com/>.

### Data protection principles

Signal will comply with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly, and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.

- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

**What personal information does Signal collect and why?**

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). The personal information that we may collect about you broadly falls into the following categories:

***Information that you provide voluntarily***

We may ask you to provide certain information voluntarily. It will be clear to you at this point what personal data you are providing. If you are a user of the Signal platform on behalf of your organisation, we will process your user details for the purposes of account set-up, management and support as a data processor on behalf of your organisation. This means that if you have any questions about this processing or want us to stop processing your personal data for these purposes, you should contact your organisation.

***Information that we obtain from third party sources***

From time to time, we may receive personal information about you from third party sources (for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers), but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

***Information that we collect from your activities***

We collect information about how you use the Signal platform and website automatically through the use of cookies and other technologies. More information about this is set out below.

The types of information we may ask you to provide, and the reasons why we ask you to provide it, include:

Types of personal information	Why we collect it
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<p>Name, e-mail address, business address and phone number, job role, job title, address details, your manager information, and their contact details and your company details. Any other information that you elect to provide to us on one of our forms, documents, or at any other time. Billing information and address.</p>	<p>To contact you – for example, to send you a contract for our services. To contact your management team if there are any issues that we need to report to them. To keep track of Signal platform usage data. To register you for events Signal is hosting or has invited you to. To send you an invoice. To keep a record of any products and services you have purchased from Signal. To have up to date marketing and comms information.</p>
<p>Information about how you use our website or the Signal platform (including data and time visited or accessed), page interaction information such as which pages within the platform you have visited, what links you have clicked on, search and workspace history, how you have moved around the platform etc. We collect this information using cookies.</p>	<p>To carry out analytics on how you and other users use our website or the Signal platform in order to understand how our product is being used and improve our products and services. You can opt out of this at any time through the platform.</p>
<p>Details of our relationship with you</p>	<p>To maintain our business records. For marketing and comms.</p>

***Purposes for which Signal will use your personal data***  
It is important that you understand why we use your personal data and what legal justification we have for doing so under data protection law. We have set out below a description of how 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.

Purpose/Activity	Lawful basis for processing including the basis of legitimate interest
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To register your organisation as a new customer	Necessary for our legitimate interests in providing a service to you.
To carry out our obligations to you arising from any contracts we have entered into to provide our services including: (a) Manage payments, fees, and charges (b) Collect and recover money owed to us (c) Providing service updates and other communications to you	(a) Necessary for our legitimate interests (to recover debts due to us) (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you and your organisation which will include: (a) Notifying you about changes to our terms or privacy notice (b) Asking you to leave a review or take a survey	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	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 (including troubleshooting, data analysis, testing, system maintenance, support, reporting, and hosting of data)	(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 products/services, marketing, customer relationships, and experiences	Necessary for our legitimate interests (to define types of customers for our products and services, to develop our business, and to inform our marketing strategy)

To make suggestions and recommendations to you about goods or services that may be of interest to you

Necessary for our legitimate interests (to develop our products/services and grow our business)

If we ask you to provide any other personal information not described above, then the personal information we will ask you to provide, and the reasons why we ask you to provide it, will be made clear to you at the point we collect your personal information.

### **Who does Signal share my personal information with?**

We may disclose your personal information to the following categories of recipients:

- to our group companies, third party services providers and partners (such as analytics and search engine providers, and other suppliers) who provide data processing services to us, or who otherwise process personal information for purposes that are described in this Privacy Notice or notified to you when we collect your personal information.
- to any competent law enforcement body, regulatory, government agency, court, or other third-party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- to a potential buyer (and its agents and advisers) in connection with any proposed purchase, merger, or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice;
- to any other person with your consent to the disclosure.

### **How does Signal keep my personal information secure?**

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

### **International data transfers**

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different from the laws of your country (and, in some cases, may not be as protective).

Specifically, Signal's servers are located in the European Union, but our group companies and some third-party service providers and partners operate around the world. This means that when we collect your personal information, we may process it in any of these countries. The transmission of information via the internet is not completely secure, and although we do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site. Where we do not need to transfer your data internationally, we put in place However, we have taken appropriate safeguards to require that your personal information will remain protected. These include:

- Only transferring your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the United Kingdom government.
- Ensuring that approved standard contractual clauses are in place that govern the transfer. These are sets of clauses that place obligations on a recipient of your personal data in another country to protect your personal data to a standard in line with the standard of data protection in the United Kingdom.

#### **Data retention**

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to continue to allow you to use the Signal platform or to comply with applicable legal, tax, or accounting requirements). We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation with respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

#### **Your data protection rights**

You have the following data protection rights:

- If you wish to access to access your personal information, you can do so by filling in the [Data Subject Access Request](#) form on our website,

- If you wish to correct, update or request the deletion of your personal information, you can do so at any time by contacting us using the contact details provided under the “How to contact us” heading below.
- In addition, you can object to the processing of your personal information, ask us to restrict the processing of your personal information or request portability of your personal information to you or a nominated third party. Again, you can exercise these rights by contacting us using the contact details provided under the “How to contact us” heading below.
- In particular, you have the right to opt out of the collection and use of information about your activities on the Signal platform for analytics purposes. You can do this by opting out of analytics in the platform directly.
- You have the right to opt-out of marketing communications we may send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the “How to contact us” heading below.
- You have the right to withdraw consent at any time where we are relying on consent to process your personal data, but please note that if you withdraw your consent we may not be able to provide you with certain products or services.
- You have the right to complain to a data protection authority about our collection and use of your personal information.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. 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.

#### **No fee usually required and what we may need from you**

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.

#### **Our use of cookies**

As described above, we collect information about your use of the Signal platform using cookies. We also use some cookies on the Signal website. If you wish to find out more about how we use cookies, please see our [Cookie Policy](#).

**Third-party websites.**

Our site may, from time to time, contain links to and from websites of our partner networks, advertisers, 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. Please check these policies before you submit any personal data to these websites.

**Updates to this Privacy Notice**

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments, so please check back frequently to see any updates or changes to our Privacy Notice. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

You can see when this Privacy Notice was last updated by checking the “last updated” date displayed at the top of this Privacy Notice.

**How to contact us**

If you have any questions or concerns about our use of your personal information, please contact us using the following details: [dataprotection@signal-ai.com](mailto:dataprotection@signal-ai.com)

For the purposes of this Privacy Notice, the data controller of your personal information is Signal Media Limited.