



HubGem Marketing Privacy Policy

Updated: 9th October 2020

Introduction

This Data Protection Privacy Policy sets out how we handle the personal data of our customers, suppliers, and other third parties in a clear way.

This policy applies to all the personal data we process regardless of how it was captured by electronic means, paper records, in person or via social media and how that data is stored or whether it relates to past or present customers, supplier contacts, shareholders, website users or any other Data Subject.

We are 100% committed to protecting your personal information and we shall always be transparent with you about how we are using your details. This document outlines how we do this, and regardless of the personal data we hold we shall process your personal data in full accordance the EU General Data Protection Regulation GDPR and the UK Data Protection Act 2018. We will be open about what information we collect, why we need it, and how we intend to use it. This document explains how we obtain, collect, process and store information about you, if we share with any third parties and details of your rights.

Full business contact information is at the end of this policy.

HubGem Marketing have core beliefs regarding your data:

- We will never sell, rent, distribute or make public your personal data
- Data should only be collected and processed when absolutely necessary
- We have duty of care to hold this data safe
- The rights of the data subject remain lawful, fair and transparent

Who is responsible for managing my information?

This website is owned and maintained by HubGem Marketing. It is hosted by HubSpot. All traffic (transferral of files) between this website and your browser is encrypted and delivered over HTTPS.

We do utilise cloud computing applications such as Office 365, which potentially means that data may be stored outside of the UK.

We are responsible for the collection and proper management of any personal information you submit. We will keep your personal details secure and use the information you provide consistently with applicable privacy and data protection laws and the terms of this Privacy Policy.

On what basis do we process your information?

We collect your personal data directly from our website and via email and telephone. We maintain records of customer contact, which falls under the lawful basis of legitimate



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interest (GDPR Article 6(f)) and under the lawful basis of being necessary for the performance of a contract (GDPR Article 6(b)).

Personal data is processed entirely for the legitimate interest of maintaining contact between us and you (our customer, or potential customer) in order to deliver our service and fulfill any contracts, which exist between us. We do not process any special category data within the meaning of GDPR.

What information do we collect?

Personal and sensitive data is required to allow us to provide our services to our clients. We will obtain your name, company and contact details and details of any colleagues with whom we may need to communicate.

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. This is done via Google Analytics and Hubspot who will capture your IP address, geographical location, details of the system you use and the pages you visit. To opt out of being tracked by Google Analytics across all websites visit their online [Click here to opt-out of Google Analytics](#).

Cookies – How do we use cookies on our websites?

Cookies are small text files that are placed on your computer when you access a website.

Our website stores cookies on your computer. These cookies are used to collect information about how you interact with our website and allow us to remember you. We use this information in order to improve and customize your browsing experience and for analytics and metrics about our visitors both on this website and other media.

For detailed information on the cookies we use and the purposes for which we use them see our Cookies Policy below.

How do we use and store your information?

The information you provide may be used in a number of ways, for example:

To personalise visits to our website, through Google Analytics and HubSpot we are able to understand how our clients found our website and are able to track their journey through the website which enables us to provide a better service.

When you complete a form on our website, you will enter your name, email address and other personal information. This information will be saved securely in HubSpot CRM and used for the purposes outlined on the form, you may also choose to 'opt in' to other communications.

If you have chosen to 'opt-in' we may use your personal data to tell you about other products and services we think may be of interest to you via an Email Newsletter or Marketing Emails, which are sent directly from our CRM system HubSpot. You may



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unsubscribe at any time by clicking the link at the bottom of the newsletter or by emailing us and asking us to remove you from this service.

By using the Contact Forms and Email links, the data you input will be entered directly into our Hubspot CRM system. Visitors to our website who have submitted data via a form or email will only be contacted for marketing purposes following their submission of explicit consent to receive such communications.

Under 16's must obtain parental consent before submitting any personal data on our website.

Do we ever share personal data?

As a HubSpot Solutions Partner, we periodically share your data (name and email) with HubSpot. HubSpot's Privacy Policy can be seen here: <https://legal.hubspot.com/privacy-policy>

We do not share your personal data with other third-parties other than data processors as listed below.

We may also disclose your personal information to third parties in the event we sell or buy business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.

Do you have any third-party processors?

As previously mentioned, we interact with carefully chosen third parties who also comply with the relevant regulations and legislation. These third parties are Google and HubSpot, which are both, based in the USA and are EU-U.S Privacy Shield compliant.

When can we contact you in the future?

We would like to send you information about our own products and services, as well as those of selected third parties. We may do this by post, telephone, email or SMS, unless you have told us that you do not wish to be contacted in this way. We will always ask you to confirm in advance that you are happy for us to allow third parties to contact you by email.

If you would like to change any of your preferences relating to the way in which we may use your information for direct marketing, then please update your user preferences or send an email to hello@hubgem.co.uk

How long will we hold your information for?

We have a system of retention periods in place to ensure that your information is only stored whilst it is required for the relevant purposes or to meet legal requirements. Where your information is no longer required, we will ensure it is disposed of in a secure manner from our systems.

How can you access and update your information?



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You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please email or write to us at the address noted at the bottom of this policy.

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.

Does this policy apply to linked websites?

Our website contains links to other websites. If you follow links to other sites from our website your data will be subject to the privacy policies of those sites. You should refer to these policies before providing your data. This privacy policy only applies to this website.

How do we update this privacy policy?

This privacy policy was last updated on 9th October 2020. It is reviewed on a regular basis and may be changed with any regulatory, legislation or company changes.

What happens if there is a data breach?

As per the GDPR regulations all data breaches will be reported to the ICO within 72 hours. This includes those of any 3rd parties where it's apparent that personal data stored has been compromised.

Who can we contact if we have any queries about this policy or how our data is held?

Please contact us if you have any questions about our privacy policy or information we hold about you.

By email: hello@hubgem.co.uk

Or write to us at HubGem Marketing, 30 The Close, Sturton-by-Stow, Lincoln. LN1 2AG

Or call us on 07532 340341

The Data Protection Officer's email address is hello@hubgem.co.uk

How can we make a complaint?

You can contact us at the above address, alternatively the supervisory authority in the UK for data protection matters is the Information Commissioner (ICO) www.ico.org.uk. If you think your data protection rights have been breached in any way by us, you are able to make a complaint to the ICO. The ICO Helpline number is 0303 123 1113.

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Last updated: 9th October 2020

HubGem Marketing ("us", "we", or "our") uses cookies on www.hubgem.co.uk (the "Service"). Under the GDPR and Data Protection Act 2018, we will ask for your specific consent to using cookies when you visit the service.



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This site may use cookies or browser tracking technologies to provide a better overall user experience. This information allows us to continue modifying the site to meet end user browser types, operating systems, and frequency of visits. Personal information cannot be collected by these methods unless specific consent is provided by the end user. Aggregate cookie and tracking information will not be shared with any third parties.

Our Cookies Policy explains what cookies are, how we use cookies, how third parties we may partner with may use cookies on the Service, your choices regarding cookies and further information about cookies.

What are cookies

About cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

Cookies that we use

We use cookies for the following purposes:

(a) authentication - we use cookies to identify you when you visit our website and as you navigate our website;

(b) status - we use cookies to help us to determine if you are logged into our website;

(d) personalisation - we use cookies to store information about your preferences and to personalise our website for you;

(e) security - we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally;

(f) advertising - we use cookies to help us to display advertisements that will be relevant to you;

(g) analysis - we use cookies to help us to analyse the use and performance of our website and services and



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(h) cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally.

Cookies used by our service providers

Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

We use HubSpot to report on and manage website activity. This service uses cookies for tracking activity across our site. You can view the privacy policy of this service provider at <https://legal.hubspot.com/privacy-policy>.

Managing cookies

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

(a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);

(b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);

(c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);

(d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);

(e) <https://support.apple.com/kb/PH21411> (Safari); and

(f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

Blocking all cookies will have a negative impact upon the usability of many websites.

If you block cookies, you will not be able to use all the features on our website.

If you should have any questions about our use of cookies on our service, please contact our Data Protection Officer on hello@hubgem.co.uk