

Master Services Agreement

Data Processing Agreement & Privacy Policy

Version: 1.1- Last Updated: 28th of May 2023

This Master Services Agreement, outlines Edge Digital's policies, approach and framework that governs our approach to privacy and data processing as an organisation. This Agreement & policy is applicable across all our clients and services unless explicitly excluded.

1. Promotional communications

We may use your personal information to send you updates (by email, text message, telephone or post) about our products and/or services, including exclusive offers, promotions or new products and/or services.

We have a legitimate interest in processing your personal information for promotional purposes (see above 'How and why we use your personal information'). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and never share it with other organisations for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by:

contacting us at contact@edgedigital.net

using the 'unsubscribe' link in emails or 'STOP' number in texts

updating your marketing preferences on any accounts you hold

We may ask you to confirm or update your marketing preferences if you instruct us to provide further products and/or services in the future, or if there are changes in the law, regulation, or the structure of our business.

2. Who we share your information with

We routinely share personal information with:

- third parties we use to help deliver our products and/or services to you or our clients, eg Advertising Platforms, CRM Providers, Hosting Partners;
- other third parties we use to help us run our business, eg marketing agencies or website hosts;
- third parties approved by you;
- credit reference agencies;
- our insurers and brokers;
- our banks.

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers relating to ensure they can only use your personal information to provide services to us and to you. We may also share personal information with external auditors for the audit of our accounts.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

We will not share your personal information with any other third party.

3. Where your personal information is held

Information may be held at our offices and those of our group companies, third party agencies, service providers, representatives and agents as described above (see above: 'Who we share your personal information with').

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal information when this occurs, see below: 'Transferring your personal information out of the EEA'.

How long your personal information will be kept

We will keep your personal information while you have an account with us or any of our clients, we are providing products and/or services to you or our clients. Thereafter, we will keep your personal information for as long as is necessary:

to respond to any questions, complaints or claims made by you or on your behalf;

to show that we treated you fairly;

to keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information.

Usually we will retain data for a period of 6 years after we finished supplying services to you or our clients.

When it is no longer necessary to retain your personal information, we will delete or anonymise it.

4. Transferring your personal information out of the EEA

To deliver services to you, it is sometimes necessary for us to share your personal information outside the European Economic Area (EEA), eg:

- with your and our service providers located outside the EEA;
- if you are based outside the EEA;
- where there is an international dimension to the services we are providing to you.

These transfers are subject to special rules under European and UK data protection law.

The EEA countries to which we may transfer personal information have been assessed by the European Commission as providing an adequate level of protection for personal information.

Non-EEA countries do not have the same data protection laws as the United Kingdom and EEA. We will, however, ensure the transfer complies with data protection law and all personal information will be secure. Our standard practice is to use standard data protection contract clauses that have been approved by the European Commission.

If you would like further information please contact us (see 'How to contact us' below).

5. Your rights

You have the following rights, which you can exercise free of charge:

- **Access**

The right to be provided with a copy of your personal information (the right of access)

- **Rectification**

The right to require us to correct any mistakes in your personal information

- **To be forgotten**

The right to require us to delete your personal information—in certain situations

- **Restriction of processing**

The right to require us to restrict processing of your personal information—in certain circumstances, eg if you contest the accuracy of the data

- **Data portability**

The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations

- **To object**

The right to object:

- at any time to your personal information being processed for direct marketing (including profiling);
- in certain other situations to our continued processing of your personal information, eg processing carried out for the purpose of our legitimate interests.

- **Not to be subject to automated individual decision-making**

The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the Guidance from the UK Information

Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please:

- email, call or write to us —see below: 'How to contact us'; and
- let us have enough information to identify you (eg your full name, address and customer or matter reference number);
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

6. Keeping your personal information secure

We have appropriate security measures to prevent personal information from being accidentally lost, or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it.

Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. We continually test our systems which mean we follow industry standards for information security.

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.

7. How to complain

We hope that we can resolve any query or concern you may raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

8. Changes to this agreement

This privacy notice was published in Jan 2021

We may change this privacy notice from time to time—when we do we will inform you via our website or other means of contact such as email.

9. How to contact us

Please contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

Our contact details

- **Address:** Edge Digital Services Limited, 27-28 Sun Street, Hitchin, Herts, SG5 1AH
- **Email:** contact@edgedigital.net
- **Telephone:** +44 (0) 203 488 5908