

Client Privacy Policy

This Privacy Policy applies to the collection, use and disclosure of personal information (i.e. personal data under applicable data privacy laws) relating to potential and existing customers of Cogora and its affiliates within the Cogora group of companies, unless a separate or affiliate privacy policy applies.

Cogora is committed to abiding by this Client Privacy Policy, as well as the requirements of applicable laws, in the operation of its business.

Please read this policy carefully as it explains the kinds of personal information we collect about you and how it is handled.

This version of the privacy policy is effective as of the 3rd May 2018.

The data controller (or "controller" as defined in the General Data Protection Regulation) is Cogora Group Limited, 140 London Wall, London, EC2Y 5DN, United Kingdom. Recipients of your data will in the first instance be Cogora Group Limited, our employees, agents and subcontractors. Other recipients of your data are as set out in this Privacy Policy.

If you have queries on this Privacy Policy or how we process your personal information please contact us by:

- Emailing our Data Protection Manager, Victoria Stanway, at data@cogora.com
- By writing to us at Cogora Group Limited, 140 London Wall, London, EC2Y 5DN, United Kingdom, or call +44 (0)20 7214 0500.

Why we need your personal data; the consequences of not supplying it

We require personal data from you in order to be able to provide goods, content and/or services to you. If you fail to provide any personal data requested we may not be able to provide our goods, content and/or services to you as intended. We may also not be able to contract with you and/or be unable to charge you and therefore be unable to provide our goods, content and/or services to you.

What personal information do we collect about you?

Information you give us:

There are a number of ways you may provide us with your personal information, such as:

- direct advertising enquiries
- media kit requests
- pitch invitations
- direct requests for our other products or services
- submitting your details via the 'contact us' form on our website

Information we collect about you:

With regard to each of your visits to our website we will automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform
- information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products or information you viewed or searched

for', page response times, [download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number.

Information we receive from other sources

This is information we may receive about you if you use any of the other websites we operate or the other services we provide or where third parties provide is with this information or where we collect it from a third party (including publicly available sources).

We work closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies). These may provide us with personal information about you.

How will we use information about you (and the legal basis for our processing)?

As a reflection of the diverse products and services we provide to our customers, we process personal data in a number of different ways.

(a) In relation to personal information you give us:

The reasons we may need to process this personal information include to

- process your payments
- supply you with purchased products and services
- prepare contractual agreements between us, you and other relevant parties e.g. HCP advisors
- provide you with details of any adverse events mentioned during the course of market research commissioned by you relating to one or more of your products or services

Legal basis for processing: where you have entered into an agreement with us, we may process your information in order to fulfil our contractual obligations or to take relevant pre-contractual steps. Otherwise we will process the information where the processing is necessary for the legitimate interests of Cogora

- provide you with details of any transfers of value where you are obligated to comply with The Bribery Act 2010

Legal basis for processing: the processing is necessary for Cogora to comply with the law

- send you email notifications when action needs to be taken by you to maintain an uninterrupted service
- deal with enquiries and complaints made by or about you relating to the website or our services
- tailor what we provide to you
- tailor any marketing or other communications or content or services we share with you to reflect your interests or anticipated needs
- provide you with newsletters and other marketing communications relating to our business which we think may be of interest to you by email e.g. our monthly client newsletter
- provide you with marketing communications relating to our business which we think may be of interest to you by post

Legal basis for processing: We will process the information where the processing is necessary for the legitimate interests of Cogora except that where we are required by law to obtain your consent for the processing in question we will do so

(b) Information we collect about you:

- tailor any marketing or other communications or content or services we share with you to reflect your interests or anticipated needs
- better understand how people interact with our websites
- create a user / company profile whereby we can identify products, events or services that may be of interest to you
- monitor usage of our website

Legal basis for processing: the processing is necessary for the legitimate interests of Cogora

(c) Information we receive from other sources:

We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

Legal basis for processing: we will process the information where the processing is necessary for the legitimate interests of Cogora or a third party

How do we use your IP address and Cookies?

We may use your IP address to help diagnose problems with our server, or to administer our websites. We may conduct analyses of user traffic to measure the use of our sites and improve the content of our websites and our services. These analyses will be performed through the use of IP addresses and cookies.

We may use additional software to collect website usage information for each of our registered users. This information will be used to personalise your repeat visits to our website and to help us get to know our users in order to provide a more relevant and improved service.

[Our cookie policy is here.](#)

Who are the recipients of your personal data outside of Cogora Group Limited?

We may disclose your information to third parties as set out below. The legal basis for this processing is as already noted above.

Service providers

We may disclose personal information about you to third parties for processing purposes associated with payment processing, the supply of goods and services to you, for website supply and administration, or for other purposes where we appoint a processor.

Other recipients

In addition, we may disclose your personal information:

- To any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006 where we reasonably need to do so.

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If our company or substantially all of its assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction, where relevant.

When is your data transferred to third countries?

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers as well as by our service providers where they are outside the EEA. This includes staff engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services.

Where we transfer your personal data outside of the EEA we will only do so where permitted to do so by law e.g. the country in question is subject to an adequacy decision or where there are appropriate safeguards required by law (typically these will be standard data protection clauses adopted by the European Commission). Please contact us if you require further details of the countries to whom we may transfer your data and safeguards we use by contacting us at data@cogora.com.

How do we keep your data secure?

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use appropriate procedures and security features to try to prevent unauthorised access.

What are your rights?

You have the right to ask us not to process your personal data for marketing purposes or for our other legitimate interests.

You can also exercise the right at any time by contacting us by:

- Emailing our Data Protection Manager, Victoria Stanway, at data@cogora.com
- By writing to us at Cogora Group Limited, 140 London Wall, London, EC2Y 5DN, United Kingdom, or call +44 (0)20 7214 0500.

You also have the right to:

- request access to and rectification or erasure of your personal data;
- restrict processing of personal data relating to you;
- withdraw your consent to the processing of your personal data at any time where the legal basis of our processing is your consent; and
- object to processing or require that your data is moved elsewhere,

as such rights are further provided in accordance with the Data Protection Act 1998 and the GDPR (as applicable from time to time).

You can lodge a complaint regarding processing of your personal data by us with the Information Commissioner's Office.

How will you know if the privacy policy changes?

We reserve the right to add to or amend this privacy policy at our sole discretion, without prior notice to you. Please review our privacy policy on a regular basis to make sure you have read the latest version and you understand what we do with your personal information.

Should we plan a fundamental change to the nature of how we process your information or which may impact upon you, we will alert you to this change in advance by emailing you and/or advertising the change on our websites.

This version of the privacy policy is effective as of the 3rd May 2018.

How long will we keep your data?

We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us or as otherwise set out below.

Data type	Retention period	Justifications
Contact information and booking history	10 years from the point of our last sale or negotiations for a sale wherein the final invoice may be allocated to another member of your organisation, or from when you last helped to facilitate the delivery of a project	Cogora are committed to providing their clients with products and/or services that meet their needs when they need them. Unless you request otherwise, Cogora will hold your data for a period of ten years during which time we may contact you regarding our range of products and/or services that we perceive may be of interest to you
Event logistics	Immediately following the event, or where applicable, following reimbursement	The purpose for processing the data is fulfilled once the event has passed