

MarketClusters is committed to safeguarding the privacy of all our website users. This privacy policy sets out how we will treat your personal information.

## 1. **What information do we collect?**

We may collect, store and use the following kinds of personal data:

- (a) information that you provide to us for the purpose of registering with us and/or subscribing to the StrategyEye website, email notifications, newsletters, and/or other services;
- (b) any other information or materials that you choose to send to us (such as uploaded files, comments or tags that you may attach to articles contained on the website, commentary attached to reports generated by you and any communications you may send to other website users;
- (c) information relating to any transactions carried out between you and us on or in relation to this website, including information relating to any purchases you make of our goods or services, such as whether you opt to make use of our free and/or promotional goods or services. However, we do not retain your credit or debit card information; and
- (d) information about your computer and about your visits to and use of this website, such as your IP address, geographical location, browser type, referral source, length of visit and number of page views.

## 2. **Cookies**

We may send a cookie (a text file sent by our web server) which may be stored by your browser on your computer's hard drive. The cookie is sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser. We may use the information we obtain from the cookie in the administration of this website, to improve the website's usability and for marketing purposes. We may also use that information to recognise your computer when you visit our website, so as to personalise our website for you.

Most browsers allow you to refuse to accept cookies. For example, in Internet Explorer you can refuse all cookies by clicking "Tools", "Internet Options", "Privacy", and selecting "Block all cookies" using the sliding selector. Please note that this may have a negative impact upon the usability of our website and you may be unable to access parts of our website.

We use Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website, such as which browser, screen resolution and IP address you are using, is used to create reports about the use of the website. Google will store this information. Google's privacy policy is available at: <http://www.google.com/privacypolicy.html>.

## 3. **Using your personal data**

Personal data submitted via this website will be used for the purposes specified in this privacy policy or in relevant parts of the website.

We may use your personal information to:

- (a) administer the website;
- (b) improve your browsing experience by personalising the website;
- (c) enable your use of the services available on the website;
- (d) send to you content, materials and/or other services purchased via the website;
- (e) send statements and invoices to you, and enable our payment partner to collect payments from you;
- (f) send you general communications about the service provided to you by MarketClusters at that time (such as administration and/or service emails);
- (g) send you email notifications which you have specifically requested;

- (h) send to you marketing communications relating to StrategyEye and/or other products or services (or the products and/or services of carefully-selected third parties where you have specifically consented to this) which we think may be of interest to you. Please note that you can inform us at any time if you no longer require marketing communications to be sent to you by emailing us at [clientsupport@strategyeye.com](mailto:clientsupport@strategyeye.com);
- (i) provide third parties with statistical information about our users – but this information will not be used to identify any individual user;
- (j) deal with enquiries and complaints made by or about you relating to the website; and
- (k) share information with our current payment provider for the purpose of processing any payments made by you to MarketClusters. Please note that in order for your payments to be processed your personal information may be referred to credit reference agencies.

We will not without your express consent provide your personal information to any third parties for the purpose of direct marketing.

#### **4. Disclosure of your information**

In addition to the disclosures reasonably necessary for the purposes identified elsewhere in this privacy policy, we may disclose information about you:

- (a) to the extent that we are required to do so by law;
- (b) in connection with any legal proceedings or prospective legal proceedings;
- (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
- (d) to the purchaser (or prospective purchaser) of any business or asset which we are selling (or are contemplating selling); and
- (e) to any holding or subsidiary company or MarketClusters Limited (as may exist from time to time).

Except as provided in this privacy policy, we will not provide your information to third parties.

#### **5. International data transfers**

Our servers are situated in the UK, however MarketClusters collects data from wherever users are situated. Information that we collect may therefore be transferred to the UK from any of the countries in which users reside in order to enable us to process users' information in accordance with this privacy policy.

If you are not situated in the European Union whilst using the website, information which you provide shall be transferred from a country (such as the United States and Japan) which does not have data protection laws equivalent to those in force in the European Union. You expressly agree to such transfers.

#### **6. Security of your personal data**

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

We will store all the personal information you provide, including your login details, on our secure servers. All electronic transactions you make to or receive from us will be encrypted using SSL technology.

Unfortunately, data transmission over the internet is not completely secure, and (although we will do our best to protect your data) we cannot guarantee the security of data sent over the internet. Any transmission is of your own will.

You are responsible for keeping your password and user details confidential.

#### **7. Policy amendments**

We may update this privacy policy from time-to-time by posting a new version on our website. You should check this page occasionally to ensure you are happy with any changes.

We may also notify you of changes to our privacy policy by email.

#### **8. Your rights**

You may instruct us to provide you with any personal information we hold about you. Provision of such information may be subject to the payment of such fee as is allowed under relevant legislation from time to time (currently fixed by English law at £10.00).

You may instruct us not to process your personal data for marketing purposes by email (to [clientsupport@strategyeye.com](mailto:clientsupport@strategyeye.com)) at any time. (In practice, we will usually either obtain your express agreement in advance to our use of your personal data for marketing purposes, or we will provide you with an opportunity to opt-out of the use of your personal data for marketing purposes.)

#### **9. Third party websites**

The website contains links to other websites. We are not responsible for the privacy policies or practices of third party websites.

#### **10. Updating information**

Please let us know if the personal information which we hold about you needs to be corrected or updated.

#### **11. Contact**

If you have any questions about this privacy policy or our treatment of your personal data, please write to us by email to [clientsupport@strategyeye.com](mailto:clientsupport@strategyeye.com), or by post to MarketClusters' operating office at Glen House, 125 Old Brompton Road, London SW7 7RP, UK, or by fax to +44 (20) 7900 6095.