



Cullinan Digital Reputation Management (“Cullinan”)

Data Protection and Privacy Policy

1. The personal data (as defined in the Data Protection Act 1998) that you supply to us, which may include all data that identify you and that is processed by us, for example, your name, address, email address, telephone number and credit card details which you give when you register or place an order with us (“Your Personal Data”) and the personal data of third parties to whom our products and services may be provided (“Third Party Data”), are held by CULLINAN and are kept confidential on our secure database.

2. We will use Your Personal Data to provide you with our products and services (including enabling you to purchase our products and services and to arrange for delivery of our products to you or to a third party, and allowing you to access our website), for administration and accounting, for marketing, to respond to complaints and to ensure that the content of our website and the products and services that we offer are tailored to your needs and interests.

3. We will use Third Party Data only for the purposes of delivering our products and services, for marketing, and to respond to any queries or complaints with regards to same.

4. We take appropriate measures to ensure that personal data are kept secure and are kept for only so long as is necessary for the purpose for which they are used.

5. We only hold such personal data as you have provided to us and we update this personal data within 14 working days of any new or updated personal data being provided to us by you, to ensure that the personal data we hold about you is as accurate as possible.

6. We will store Your Personal Data for so long as you are a registered user of our website, or in the case of email communications, for so long as necessary for us to respond to your query. After that, we will keep Your Personal Data on our records for a period of two years to enable us to respond to any queries or complaints that you may have. After this time we will delete all of your personal data from our records, apart from any data that we are required to keep for legal reasons - for example we will need to keep your billing data for seven years in accordance with Inland Revenue rules.

E: info@cullinandrm.com

T: +44(0) 207 089 2627

W: www.cullinandrm.com

7. We may pass your Personal Data to third parties who will provide certain elements of our services to you on Cullinan's behalf (for example, contract staff who are better able to answer certain queries you might have), however all such third parties will be bound to provide at least the same level of protection for your Personal Data as we provide.

8. Where you opt to take part in our online survey and you provide us with Your Personal Data in the process, we may use Your Personal Data to perform various quantitative and qualitative analyses in order to improve our services to our customers.

9. You are entitled to ask for a copy of Your Personal Data (for which we may charge a small fee) and to have any inaccuracies in Your Personal Data corrected.

10. For quality control and training purposes, we may monitor or record your communications with us.

11. Cookies

We may store information about you in a cookie (a small file that is sent by our web server to your computer), which we can access when you make return visits to our website. Sending cookies is usual practice for any website that needs to remember what its users' preferences are and we use cookies to keep track of your choices and your usage of our website.

If you want to delete any cookies (if any) that are already on your computer, please refer to the instructions for your file management software to locate the file or directory that cookies are stored in. If you want to stop cookies being stored on your computer in the future, please refer to your browser manufacturer's instructions by clicking "Help" in your browser menu. Further information about deleting or controlling cookies is available at www.aboutcookies.org.

12. Please note that when you visit our website, we may also log your IP address, a unique identifier for your computer or other access device. We will keep these records for up to two years.



If your personal details change, please email us at info@cullinandrm.com.

If you have any queries about how we use personal data, please contact us by writing to CULLINAN DRM, 98 Crane Street, Salisbury, Wiltshire, SP1 2QD or by email at info@cullinandrm.com.

13. If this privacy policy changes in anyway, we will place an updated version on this page. Regularly reviewing this page ensures you are always aware of what information we collect, how we use it and under what circumstances, if any, we will share it with other parties.

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