

BongoAds LTD Privacy

1. Who we are

The full name of our company is BongoAds Ltd We are registered in the United Kingdom registered address is 128, City Road, London, EC1V 2NX

We are an outsourced marketing company, providing marketing services as a 'plug-in' marketing department to businesses throughout the United Kingdom.

1. The type of personal information we collect

- 1.1. We collect certain personal information about visitors and users of our Sites.
- 1.2. The most common types of information we collect include things like: usernames, member names, email addresses, IP addresses, other contact details, survey responses, blogs, photos, payment information such as payment agent details, transactional details, tax information, support queries, forum comments, content you direct us to make available on our Sites (such as item descriptions) and web analytics data. We will also collect personal information from job applications (such as, your CV, the application form itself, cover letter and interview notes).

2. How we collect personal information

- 2.1. Cookies
- 2.2. What are cookies?
 - 2.2.1. A cookie is a small piece of text that can be stored on your computer, phone or whatever device you use to surf the Internet by the websites you visit. Cookies have many uses, but fundamentally they are used to store information about you. You can find out more information about cookies at aboutcookies.org.
- 2.3. What cookies do we use?

3. Google Analytics

- 3.1. Google Analytics is the program we use to collect statistics from our website to show us how visitors use our site. We use the information to create reports and to help us to constantly improve the site. The

cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.

Name of cookie	How long does it stay on my machine?
__utma	2 years
__utmb	30 minutes
__utmc	Until you close your browser
__utmz	6 months

Further information is available available about [Google Analytics cookies](#), and Google even offer [an 'opt-out' plugin](#) if you don't want to accept their cookies.

4. Session cookie

- 4.1. Our site uses a session cookie which is essential for the site to function properly. By this point, the cookie will already have been set. You may delete and block all cookies from our site, but this may cause it to stop working properly.

Name of cookie	How long does it stay on my machine?
PHPSESSID	20 minutes or until you close your browser

5. Social media

5.1. This website uses social media plugins associated with Twitter and Facebook, both of which use remote cookies to recognise users who have previously logged in from the same computer/device. Cookies of this nature are quite controversial, and you would be well within your rights to refuse their use.

Name of cookie	How long does it stay on my machine?
datr (Facebook)	2 years
guest_id (Twitter)	7 days

6. Youtube cookies

6.1. This website includes several embedded videos from Youtube. This feature uses a set of cookies to collect data on where videos are being viewed from. If you are logged in to a Youtube account, the videos you view will appear in your history. Youtube and its associated cookies are owned by Google.

Name of cookie	How long does it stay on my machine?
pref	2 years
VISITOR_INFO1_LIVE	7 months
use_hitbox	Until you close your browser

7. How do I control which cookies are allowed?

7.1. You can use your internet browser's options to set the level of cookies your machine will accept. Instructions are provided below – please click the link for the browser you use.

1. [Internet Explorer](#)
2. [Mozilla Firefox](#)
3. [Google Chrome](#)
4. [Safari](#)
5. [Opera](#)

8. Personal data BongoAds LTD collect

- 8.1.** We collect personal information directly when you provide it to us, automatically as you navigate through the sites, or through other people when you use services associated with the sites.
- 8.2.** We collect your personal information when you provide it to us when you complete a contact form on our website, or when you enquire for our services by phone or email.

9. Personal information we collect about you from others

- 9.1.** Although we generally collect personal information directly from you, on occasion, we also collect certain categories of personal information about you from other sources. In particular:
 - 9.2.** Financial and/or transaction details from payment providers.
 - 9.3.** Third-party service providers (like Google, Facebook) who are located in the US or UK, which may provide information about you when you link, connect or follow

10. How we use personal information

- 10.1.** We will use your personal information:
- 10.2.** To fulfil a contract, or take steps linked to a contract: in particular, in facilitating and processing transactions that take place on the sites, like where you purchase an item from our marketplace.
- 10.3.** Where this is necessary for purposes which are in our, or third parties, legitimate interests. These interests include:
 - 10.3.1.** Operating the sites
 - 10.3.1.1.** Providing you with services described on the sites
 - 10.3.1.2.** Responding to support tickets, and helping facilitate the resolution of any disputes;
 - 10.3.1.3.** Updating you with operational news and information about our sites and services e.g. to notify you about changes to our sites, website disruptions or security updates;
 - 10.3.1.4.** Monitoring activity on the sites, e.g. to identify potential fraudulent activity and to ensure compliance with the user terms that apply to the sites;
 - 10.3.1.5.** Managing our relationship with you, e.g. by responding to your comments or queries submitted to us on the sites

- 10.3.1.6.** Managing our legal and operational affairs (including, managing risks relating to content and fraud matters)
 - 10.3.2.** Where you give us consent:
 - 10.3.2.1.** Providing you with marketing information about products and services which we feel may interest you
 - 10.3.2.2.** Customising our services and websites, like advertising that appear on the site – where this involves the use of cookies or similar technologies – in order to provide a more personalised experience.
 - 10.3.3.** For purposes which are required by law.
 - 10.3.4.** For the purpose of responding to requests by government, a court of law, or law enforcement authorities conducting an investigation.

11. When we disclose your personal information

- 11.1.** We will disclose personal information to the following recipients:
 - 11.1.1.** Subcontractors and service providers who assist us in connection with the ways we use personal information (as set out above), in particular: website hosting providers which are located in the UK
 - 11.1.2.** Regulators and government authorities in connection with our compliance procedures and obligations
 - 11.1.3.** A purchaser or prospective purchaser of all or part of our assets or our business, and their professional advisers, in connection with the purchase;
 - 11.1.4.** A third party to respond to requests relating to a criminal investigation or alleged or suspected illegal activity;
 - 11.1.5.** A third party, in order to enforce or defend our rights, or to address financial or reputational risks;
 - 11.1.6.** A rights holder in relation to an allegation of intellectual property infringement or any other infringement; and
 - 11.1.7.** Other recipients where we are authorised or required by law to do so.

12. Where we transfer and/or store your personal information

- 12.1.** We are based in United Kingdom (UK) so your data will be processed in the UK. In order to protect your information, we take care where

possible to work with subcontractors and service providers who we believe maintain an acceptable standard of data security compliance.

13. How we keep your personal information secure

13.1. We store personal information on secure servers that are managed by us and our service providers, who are CWCS for website hosting, Google for data storage, Easy Contact Now for telemarketing purposes, Mailchimp, Active Campaign and Freshmail for email marketing, Kashflow for our accounting package and Dashlane for our password files. Personal information that we store or transmit is protected by security and access controls. For details of our partners privacy policies, please click the links below.

- 13.1.1.** Google - https://services.google.com/fh/files/misc/google_cloud_and_the_gdpr_english.pdf
- 13.1.2.** CWCS - <https://www.cwcs.co.uk/gdpr>
- 13.1.3.** CWCS PRIVACY POLICY - <https://freshmail.com/privacy-policy-2/>
- 13.1.4.** Easy contact now - <https://www.easycontactnow.com/privacypolicy>
- 13.1.5.** Mailchimp- https://mailchimp.com/legal/privacy/?_ga=2.142404852.736550346.1526382171-1253620698.1512044492&_gac=1.216328738.1526385997.EAlalQobChMIzqiB7daH2wIVU5kbCh0b0glIEAAYASAAEgJhofD_BwE
- 13.1.6.** Active Campaign - <https://www.activecampaign.com/gdpr-updates/>
- 13.1.7.** Fresh Mail - <https://freshmail.com/gdpr/>
- 13.1.8.** FRESHMAIL PRIVACY POLICY - <https://freshmail.com/privacy-policy-2/>
- 13.1.9.** Kashflow - <https://www.kashflow.com/privacy-policy/>
- 13.1.10.** LinkedIn - <https://www.linkedin.com/help/linkedin/answer/87080/linkedin-marketing-solutions-and-the-general-data-protection-regulation-gdpr-?lang=en>
- 13.1.11.** Facebook - <https://www.facebook.com/business/gdpr>
- 13.1.12.** FACEBOOK PRIVACY POLICY - <https://www.facebook.com/privacy/explanation>
- 13.1.13.** Twitter - <https://gdprprivacypolicy.org/privacy-policy/>
- 13.1.14.** You Tube - <https://www.youtube.com/intl/en-GB/yt/about/policies/#community-guidelines>
- 13.1.15.** Pinterest - <https://policy.pinterest.com/en-gb/privacy-policy>
- 13.1.16.** Instagram - <https://help.instagram.com/155833707900388>

- 13.1.17. INSTAGRAM NEW DATA POLICY - https://help.instagram.com/519522125107875?helpref=page_content
- 13.1.18. Manage Flitter - <https://manageflitter.com/privacy>
- 13.1.19. Social OOmph - <https://www.socialoomph.com/privacy>
- 13.1.20. Hootsuite - <https://hootsuite.com/en-gb/legal/general-data-protection-regulation>

14. How you can access your personal information

- 14.1. You have the right to make a request to access any personal information we hold about you and to request corrections of any errors in that data. To make an access or correction request, contact our offices using the contact details at the beginning of this policy.

15. BongoAds LTD use and marketing choices regarding your personal information

- 15.1. Where we have legitimate interest or consent to do so (e.g. if you have subscribed to one of our e-mail lists or have indicated that you are interested in receiving offers or information from us), we send you marketing communications by email about services that we feel may be of interest to you. You can 'opt-out' of such communications if you would prefer not to receive them in the future by using the "unsubscribe" facility provided in the communication itself.
- 15.2. Definition of legitimate interest
 - 15.2.1. It is proportionate
 - 15.2.2. It has minimal impact on your privacy impact
 - 15.2.3. Recipients would not be surprised to receive contact
 - 15.2.4. Recipients would not be likely to object to our contact
- 15.3. You also have choices about cookies, as described below. By modifying your browser preferences, you have the choice to accept all cookies, to be notified when a cookie is set, or to reject all cookies. If you choose to reject cookies some parts of our sites may not work properly in your case.
- 15.4. BongoAds LTD operates under TPS and CTPS data policies, and therefore any data we use are cleared under this legislation.

16. Information you make public or give to others

- 16.1.** If you make your personal information available to other people, we can't control or accept responsibility for the way they will use or manage that data. There are lots of ways that you can find yourself providing information to other people, like when you post a public message on a forum thread, share information via social media, or make contact with another user (such as a third party Author) whether via our sites or directly via email. Before making your information publicly available or giving your information to anyone else, think carefully.
- 16.2.** If giving information to another user via our sites, ask them how they will handle your information. If you're sharing information via another website, check the privacy policy for that site to understand its information management practices as this privacy policy will not apply.

17. How long we keep your personal information

- 17.1.** We retain your personal information for as long as is necessary to provide information and/or services to you and to comply with our legal obligations. If you no longer want us to use your personal information or to provide you with the services, you can request that we erase your personal information and close your BongoAds LTD
- 17.2.** Please note that if you request the erasure of your personal information we will retain information from deleted accounts as necessary for our legitimate business interests, to comply with the law, prevent fraud, collect fees, resolve disputes, troubleshoot problems, assist with investigations, enforce the terms of service and take other actions permitted by law. The information we retain will be handled in accordance with this Privacy Policy.

18. How we handle your client personal information

- 18.1.** The personal data that you provide to us must be GDPR compliant. As a data handler we will ensure all Personally Identifiable Data (PID) you provide is held securely and the transfer of PID between BongoAds LTD and client is also secure. However as the data owner it is your responsibility to ensure all data provided to BongoAds LTD meets GDPR. BongoAds LTD will make contact with all client prospects in good faith that GDPR has been met and will not be held responsible for using poorly curated data.

For information regarding your own GDPR, please refer to <https://ico.org.uk>, where there is a checklist of compliance actions.

18.2. Legitimate interest and opt-in

18.2.1. “It is likely to be most appropriate where you use people’s data in ways they would reasonably expect and which have minimal privacy impact, or where there is a compelling justification for the processing”. Extract from the ICO GDPR Guide

18.2.2. For more information regarding ‘Legitimate Interest’ please refer to <https://ico.org.uk>

18.3. Once we hold your GDPR compliant data for your marketing purposes, we use the platforms outlined in section 13.1 for data storage and distribution.

18.4. Our marketing communications carry opt-out solutions from any of your opt-in client data.

18.5. Our software systems allow automated removal once the individual opts-out of any previously opted-in data record, if the individual decides that they no longer be part of your marketing communications.

18.6. BongoAds LTD operates under TPS and CTPS data policies, and therefore any data that you supply to us must be previously screened against these regulations before sending to BongoAds LTD.

19. When we need to update this policy

19.1. We will need to change this policy from time to time in order to make sure it stays up to date with the latest legal requirements and any changes to our privacy management practices.

19.2. When we do change the policy, we’ll make sure to notify you about such changes, where required. A copy of the latest version of this policy will always be available on this page.

20. How you can contact us

20.1. If you have any questions about our privacy practices or the way in which we have been managing your personal information, please contact our offices in writing at BongoAds Ltd, 128, City Road, London, EC1V 2NX, United Kingdom OR bongoads.dir@tuta.io.

21. If you're a user or visitor in the European Economic Area these rights also apply to you:
 - 21.1. For the purposes of applicable EU data protection law (including the General Data Protection Regulation 2016/679 (the "**GDPR**"), we are a 'data controller' of your personal information.

Both personal information and personal data have the same meaning in the context of this Privacy Policy.