

## **APERTURE STRATEGY LTD – DATA PROTECTION AND PRIVACY POLICY**

1. Aperture Strategy Ltd is consultancy company licenced in England and Wales with registered number 13860942. It provides specialist advice and procedural support to clients following contracted engagement. Aperture Strategy may be contacted by email at [enquiries@aperture-strategy.co.uk](mailto:enquiries@aperture-strategy.co.uk) or in writing at 27 Old Gloucester Road, London, WC1N 3AX.

2. Aperture Strategy takes its responsibility for the security of personal data extremely seriously and our procedures are fully aligned with the safeguarding requirements of the UK Data Protection Act 2018 and the EU General Data Protection Regulations 679/2016. Our over-riding principle is that personal information will only be accepted from the individual themselves and we will be sure that express permission has been given for us to use that information only for the purpose that it is given. We do not link with, or otherwise seek from or provide to any personal information held or used by a third party.

3. This Privacy Policy applies wherever we act as Controller with respect to personal data of our service users, email recipients, website visitors, and/or and other circumstance where we determine the purposes and means of processing personal data.

### **Accountability**

4. Aperture Strategy considers itself responsible and accountable for compliance with data protection regulation and best practice and that it is fully able to demonstrate that compliance. Appropriate technical and organisational measures have been established to meet the requirements of accountability, including through our data protection policy which is based on a 'data protection by design and default' approach. Accountability it also demonstrated through the maintenance of clear and accurate documentation relating to contracts, individuals, and processes, and the implementation of appropriate and robust data security measures.. Aperture Strategy strives for a culture of privacy and confidentiality across the organisation in order to build trust with our clients. The Directors are responsible for all aspects of compliance and the daily management of the compliance framework.

### **Consent**

5. Information provided by individuals to Aperture Strategy will be stored on a secure company server and will not be shared automatically with any third-party. All data will be collected for specific, explicit, and legitimate purposes and will not be further processed in a manner that is incompatible with these purposes. Data will be limited to that which is adequate and relevant to what is necessary to fulfil individuals' expectations of the service provided. Based on these principles of assurance, a record will be kept of the individual's express consent for us to use and store any personal information provided. Consent, supported by contract and legitimate interests, provides the lawful basis from which Aperture Strategy will store and process personal information provided.

### **Usage Data**

6. Every time the Aperture Strategy website is accessed, usage data will be collected. This data is sent to Aperture Strategy automatically by the individual's internet browser and is stored on internet log files. This data includes information about the individual's browser type, the

individual's operating system (and its screen resolution), and the Internet Protocol (IP) address provided by their ISP. Aperture Strategy may also compare the individual's IP address against any number of freely available geo-databases to collect information about the individual's ISP location. Information will also be recorded about the date and time that the website was accessed, any referral URL that linked the individual to Aperture Strategy, the amount of data transmitted during the individual's use of the website, a status message about the success or otherwise of access, and a session identifier. The legal basis for this processing is our legitimate interests in monitoring and improving our website and responding to market interest.

### **Service and Account Data**

7. Aperture Strategy may also process data necessary for the management of contracted relationships with our clients. This might include – but is not limited to – names, email addresses, telephone numbers, or company information provided by our clients and required to deliver the services for which we are contracted. The legal basis for this processing in the performance of a contract with a client or the negotiation of a contract.

8. We may also process: information about any enquiry about our services or expression of interest for the purposes of offering, marketing, and selling; information regarding any incidental communication or correspondence; or information found in the public domain or on social media.

### **Prevention of Abuse and Misuse**

9. If there is evidence of misuse of processed or controlled data for which Aperture Strategy is responsible through our data processing, then Aperture Strategy will investigate. Additionally Aperture Strategy undertakes profile checks against any subscribers that are reported by use of the 'Suspicious Profile' button and/or have been deemed to have breached our General Terms and Conditions. Aperture Strategy acknowledges and accepts it is its obligation and interest to safeguard its platform and its subscribers from any breach of our General Terms and Conditions and/or legislation.

### **Data Sharing**

10. Aperture Strategy doesn't routinely share data with third parties and will only share user data with third-party providers if it is required as part of the legitimate and declared service to the user or if the user gives their express consent. It should be noted that the exercise of law through a Court Order is also considered a 'Third Party'.

11. We periodically appoint digital marketing agents to conduct marketing activity on our behalf. Such activity may result in the compliant processing of personal information. Our appointed data processors include Prospect Global Ltd (trading as Sopro) Reg. UK Co. 09648733. Sopro may be contacted and its privacy policy viewed at <http://sopro.io>. Sopro is registered with the ICO (Reg: ZA346877); its Data Protection Officer can be emailed at [dpo@sopro.io](mailto:dpo@sopro.io).

### **Cookies and Tracking Technology**

12. Almost every website uses cookies. A Cookie is a plain text file that is sent to a device when a user is surfing the internet. It is stored in the device's browser. Cookies are used to personalise browsing experiences by tracking user activities. When a user revisits a website their

browser will recognise the user as having returned to the site. Some cookies are automatically deleted at the end of a browser session (these are called session cookies). Others are stored for a certain period of time or permanently on a browser before they self-delete or are manually removed (these are called persistent cookies). By using our website and agreeing to this Privacy Policy, you consent to Aperture's use of cookies.

### **Data Handling**

13. All personal data provided will be processed lawfully, fairly, and in a transparent manner in relation to the requirements and intention of our clients and services. Every effort will be made to ensure that data is accurate and up to date, and every reasonable measure will be taken to ensure that any personal data that is identified to be inaccurate or out of date is erased or rectified without delay. Personal data will be kept in a form which permits identification of individuals for no longer than is necessary for the purposes for which the data was provided, stored, and processed. Data will be stored and processed with technical and organisational measures that ensure its appropriate security, including protection against unauthorised access, loss, destruction, amendment, or damage.

### **Individuals' Rights to be Informed**

14. Before individuals are asked to consent to the storage and processing of personal information, they will be assured of their rights to be informed of the following matters:

- a. The name and contact details of Aperture Strategy's company officers and representatives.
- b. The legitimate interests and purposes of Aperture Strategy's processing of information and their lawful basis.
- c. The categories of personal data to be obtained, stored, and processed.
- d. The recipients of all data provided and/or those with authorised access.
- e. The details of transfers of the personal data to any third parties or international organisations.
- f. The retention period of all data.
- g. The rights of individuals in regard to processing of data.
- h. The right to withdraw consent.
- i. The right to lodge a complaint with an appropriate authority.
- j. The individual's contractual obligation to provide information.
- k. Details of the use of information for automated decision-making, including profiling.

### **Individuals' Rights to Access**

15. Before individuals are asked to consent to the storage and processing of personal information, they will be assured of their rights to access to data. Individuals have the right to obtain the following from Aperture Strategy:

- a. Confirmation that their personal data is subject to processing and the purpose of processing.
- b. A copy of all personal data stored and the categories under which it is stored and processed.

- c. All information referred to in the above paragraph concerning the 'Right to be Informed'.

16. An individual is only entitled to their own personal data as defined by the UK Government Information Commissioner's Office. Requests for information (subject access) can be made verbally, electronically, or in writing and to any part of the Aperture Strategy organisation. Unless it is considered manifestly unfounded or excessive, subject access requests will be answered without undue delay and within two calendar weeks of receipt, conditional on the need to confirm the identity of the person making the request or clarification of the information requested. Subject access requests will be satisfied by providing the information held at the time of the request.

### **Individuals' Rights to Rectification**

17. Before individuals are asked to consent to the storage and processing of personal information, they will be assured of their rights to request inaccurate data is rectified. Whilst all reasonable steps will be taken by Aperture Strategy to ensure that information is accurate when provided, individuals retain the right to have the accuracy of information reconsidered upon request. Unless it is considered manifestly unfounded or excessive, requests for rectification will be answered without undue delay and within two calendar weeks of receipt, conditional on the need to confirm the identity of the person making the request or clarification of the information involved.

### **Individuals' Rights to Erasure**

18. Before individuals are asked to consent to the storage and processing of personal information, they will be assured of their rights to request data is erased from storage by Aperture Strategy ('The Right to be Forgotten'). Should an individual request the erasure of a specific piece of information which does not manifestly prejudice their continued subscription and benefit from services provided, requests for erasure will be answered without undue delay and within two calendar weeks of receipt, conditional on the need to confirm the identity of the person making the request or clarification of the information involved.

19. Following a request for erasure Aperture Strategy will take all necessary steps to erase data from back-up systems as well as 'live' systems. All back-up data will be put 'beyond use' even if it cannot be over-written. Such data will not be used within the back-up for any other purpose until it is replaced in line with an established update schedule.

### **Individuals' Right to Restrict Processing**

20. Before individuals are asked to consent to the storage and processing of personal information, they will be assured of their rights to request restriction of data processing using the data they have provided. Requests for restriction may be made if the individual contests the accuracy of the data provided and the data is in the process of being verified, or if the individual alleges that the data has been unlawfully processed in breach of the legitimate nature of the processing necessary.

### **Individuals' Right to Data Portability**

21. Aperture Strategy recognises an individual's right to data portability (given the lawful basis for processing the information provided is consent) but does not envisage a situation when it

might be reasonably exercised. No data will be stored that is additional to 'inferred' or 'derived' from personal information provided. Should a request for data portability be received by representatives of Aperture Strategy it will be considered in alignment with Articles 13, 20, and Recital 68 of GDPR 679/2016.

### **Individuals' Right to Object**

22. Aperture Strategy will not use personal information for direct or indirect marketing purposes. This does not affect an individual's right to object to their information being processed.

23. Users have the right to file a complaint about this policy or its implementation to

The Information Commissioner's Office,  
Wycliffe House,  
Water Lane,  
Wilmslow,  
Cheshire.  
SK9 5AF,

Telephone Number: + 44 (0) 303 123 1113

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

### **Liability**

24. Aperture Strategy accepts liability for the loss, or damage resulting from the loss of, individuals' personal data and will not transfer risk inappropriately to individuals by seeking to indemnify itself against claims for loss or damage.

### **Regulation.**

25. This policy is ultimately regulated by the Information Commissioner's Office, part of the UK Government Competition and Markets Authority.