

# ULTIMAMEDIA

PART OF  Süddeutscher Verlag

This is the general privacy policy for **Ultima Media Ltd**, part of the Süddeutscher Verlag group of companies, and for a range of products and services we provide through this website and the websites of our individual products and additional applications (“our sites”).

At Ultima Media we collect different types of information about our users for six main reasons:

1. To provide personalised services unique to individual users
2. To help us to monitor and improve the services we offer
3. To keep customers up-to-date about the products and services they have purchased or subscribed to
4. To fulfil contracted services
5. To sell advertising space on the site. This helps us to keep the site free for people who visit it.
6. If we have permission from the user, to market products and services to them.

Some of our services may have their own specific privacy policy because the services we provide in that instance are different. So please do check when you sign up or register just to be sure you know what is happening to your information.

To make it easier for you to read this policy, below are a number of links that will take you directly to particular sections.

1. [About us](#)
2. [Registration as a subscriber or a delegate](#)
3. [Other information about your data](#)
4. [Updating your personal information](#)
5. [Who we share data with](#)
6. [Use of Cookies](#)
7. [About our advertising](#)
8. [Legal information and how to contact us](#)
9. [Changes to this privacy policy](#)

## **1. About us**

1. The protection of your privacy and personal information is important to us. We make sure that not only do we have appropriate security measures in place, but that any other organisation we work with to provide a service also meets the same standard as us.
2. We will respect your privacy. You should receive marketing emails only from us and, if you agree, from other organisations we have carefully chosen. We will make sure that the boxes you need to tick if you are happy to receive marketing are presented clearly and at an appropriate time.
3. We will make it clear at the point when we request your information, what we are collecting it for and how we are going to use it.
4. We will collect and use your personal information only if we have your permission or we have sensible business reasons for doing so, such as collecting enough information to manage your subscriptions or process your event registration.
5. We will minimise the amount of information we collect from you to what we need to deliver the product and services you have requested.
6. We will be clear in our dealings with you as to what information about you we will collect and how we will use it.
7. We will use personal information only for the purposes for which it was originally collected and we will make sure we delete it securely.
8. Our websites are accessible via the internet. Please remember that if you post any comments or links on any of our sites that they can be read and accessed by anyone and everyone.
9. If we, our service providers, or our commercial partners transfer any information out of the European Economic Area (EEA), it will only be done with the relevant legal instruments or permissions being in place.

## **What information do we collect about you and how do we use it?**

We collect information on you:

- when you register for an event (including live streamed events), an awards programme or competition
- when you contact us for information
- when you work with us in a commercial capacity, either as a sponsor or partner
- when you sign up for a newsletter
- when you subscribe to a paper or digital magazine
- when you download an app
- when you use the website
- through cookies

- if you choose to reveal information in postings
- if you complete your details on research questionnaires, and
- when you enter sales promotions and competitions.

Certain services that we provide may involve us collecting extra information (your location or preferred language, for example), so that we can tailor the information we give you better. This may also apply to certain apps that you download, or which we provide.

### **What legal bases do we use for processing your data?**

- We use different legal bases depending upon the purpose for collecting your data in the first instance.
- For all data collected to sign up for a product and service such as a newsletter, an event or a magazine subscription we process the data using Legitimate Interest, i.e. you are able to access an extensive range of information in exchange for supplying your information, and we have a relationship where the balance of benefit is in your favour.  
You always have a choice in the management of your data in this manner and can opt out of processing under this basis at any time.
- Where you provide data in the course of the purchase of a product we process your data under Contract, i.e. your data is necessary for the fulfilment of the service.
- Any additional contact, i.e. telling you about another product or service closely related to the product or service you have bought is managed under legitimate interest.
- Any secondary processing of your data, i.e. sharing with third parties, sending you messages on behalf of third parties, transfer to third countries, is managed under Consent.
- Where we are required by statutory obligation to retain data e.g. for accounting or taxation purposes, we manage this data under legal obligation.

Under the terms of current data protection legislation, we will always make it as easy as possible for you to opt out of unwanted processing, providing it does not restrict our ability to provide you with the service you have requested.

### **Profiling**

From time to time we may use some elements of the data you supply to target the messages we send you. For example, we may use your location to send you information about an event which is happening in the same country, or we may use your company type to send you a relevant news story.

None of this information is collated by wholly automated means and the rights and freedoms of the data subject are safeguarded by suitable measures.

You always have a choice about your data being utilised in this way and can opt out at any time.

### **How long do you hold on to my data?**

Because we collect data for a wide range of purposes, we do not have a singularly defined retention period. For each individual product and service we define a carefully assessed timeframe within which we retain your data.

After this, data is managed to ensure that it is either erased from our system, minimised and retained for legal reasons or pseudonymised and retained on a global suppression list to ensure that you do not receive unwanted messaging from us.

### **2. Registering as a subscriber or delegate**

The minimum information we need from you to register you as either a subscriber or a delegate is your name, job title, company name and address, landline telephone number and email address. We will ask you more questions for different services, including marketing emails. Unless we say otherwise, you must answer all the registration questions.

We may also ask some other, voluntary questions during registration (for example, general demographic questions about your business) so we can gain a clearer understanding of who you are. This enables us to assess whether you qualify for a free subscription or registration, need to be invited to an event as a VIP or to deliver specific products to you. We may also use these details to create anonymised audience information for our sponsors and partners to facilitate their advertising or commercial decision-making processes.

We will process data collected for the purpose of facilitating your registration or subscription on the basis of Legitimate Interests to deliver the service for which you have registered or subscribed. We will also, on this basis, contact you occasionally about other relevant Ultima Media products and services which we think will interest you. You always have a choice and can opt out of processing on this basis at any time by contacting our Database Manager Justyna Makowiecka by email [Justyna.Makowiecka@ultimamedia.com](mailto:Justyna.Makowiecka@ultimamedia.com) or telephone +44 20 8987 0900

### **3. Other uses of your data**

With your permission, we may also send you emails from trusted partners we think may interest you. At any time you can decide not to receive these emails and will be able to 'unsubscribe'.

We do not sell your data at any time. We will only share your data with our sponsors and commercial partners with your permission.

## **Use of children's data**

We only collect or store any personal information about children under the age of 16 in the context of the GM Interactive Competition. This is applicable to young people aged 14-16 where permission is obtained directly from a legal adult guardian to collect this information.

## **4. Updating your personal information**

Under current data privacy legislation, you have the right to rectify, erase or restrict the processing of your data without undue delay. You may also request access to the data we hold on you.

To do this or to update your personal information at any time please contact our Database Manager Justyna Makowiecka by email [Justyna.Makowiecka@ultimamedia.com](mailto:Justyna.Makowiecka@ultimamedia.com) or telephone +44 20 8987 0900

## **5. Who we share data with**

Your personal information may be shared with the Süddeutscher Verlag group of companies that are based in the UK or Germany. For example, when there is direct crossover between products and services.

We will not share your personal information with others for marketing purposes unless you have given us your permission. If we have your permission, we will share your information only with other organisations we have chosen carefully.

We may make other organisations' services available, through our sites, although we are not necessarily operating these sites. We process any information which we collect when you access a service provided by another organisation under this privacy policy. Information these other organisations collect is governed by their own privacy policies.

We can access and release personal information to keep to relevant laws and government requests, to operate our systems properly and to protect both us and our users. Any other organisations who access your information in the course of providing services on our behalf will be governed by strict contractual restrictions to make sure that they protect your information and keep to data-protection and privacy laws which apply. We may also independently audit these service providers to make sure that they meet our standards. We may use service providers to help us run these sites (or services available on the sites), some of whom may be based outside the EEA or countries deemed adequate by the EDPB.

## **6. Use of Cookies**

We use cookies for a number of specific reasons.

1. For statistical purposes to track how many users we have and how often they visit our websites. We collect information listing which of our pages are most frequently visited, and by which types of users and from which countries.
2. We use other organisations to collect anonymous user information, sometimes through cookies and web beacons, (information embedded in images which allow

them to analyse how the website is being used and the number of visitors) e.g. Inspecler, mouseflow.

3. Placing cookies on your computer means we can show you adverts that you might be interested in and allows us to control the number of times you see them and measure how effective the ad campaign has been. Advertising helps us to keep the site free for you to use. You can find more information on this in the Advertising section of this privacy policy, including how you can 'opt out'.
4. We may use 'Flash' cookies to store your preferences for your media player (for example, volume and so on). If we don't use them, you may not be able to watch some video content. All of our videos are broadcast in YouTube, Vimeo and 3rd party video sharing applications which are embedded on our own website.
5. You can turn cookies off but if you do this, you may not be able to use all services on our websites and you might see more pop-ups and other advertising. This is because we won't be able to limit what you see by using cookies. However, you will still be able to see our editorial content.
6. We or other companies may use cookies to suggest and deliver content which we believe may interest you.
7. By using the sites you are agreeing to the use of cookies as described.

### [Cookie policy](#)

### **Google Analytics**

We use Google Analytics on our sites for anonymous reporting of site usage and for advertising on the site. If you would like to opt-out of Google Analytics monitoring your behaviour on our sites please use this link <https://tools.google.com/dlpage/gaoptout>

### **7. Advertising**

We may share anonymised behavioural data with advertising partners, including commercial organisations that fund content labelled 'Supported by', 'Paid content/Paid for by' or 'Sponsor content/from our sponsors'. This may mean that when you are on other websites, you will be shown advertising based on your behaviour on an Ultima Media website. We may also show you advertising on our site based on your behaviour on other sites.

If you want to opt out of receiving online behavioural advertising, this does not mean that you will no longer receive advertising when you are using our sites. It just means that the advertising you see will not be customised for you.

If you would like more information about OBA and how to opt out of it, please visit [youronlinechoices.com](http://youronlinechoices.com) or [networkadvertising.org](http://networkadvertising.org) (if accessing from the US.)

Advertising on mobile devices may require the collection and sharing of the unique device ID with companies who purchase advertising space on the mobile application.

## **8. Legal information and how to contact us**

Under the UK Data Protection Act 1998 we have to say who the 'data controller' is for Ultima Media products and services provided via our websites, our magazines, events and other products and services. The data controller is the organisation responsible for protecting information and, in our case, is Ultima Media Ltd, 401 King Street, London W6 9NJ.

If you would like access to or a copy of the personal information we hold about you, to request a correction, or have any questions about how we may use it or to make a complaint, please contact the Data Protection Manager Justyna Makowiecka at the address shown above. Or email [Justyna.Makowiecka@ultimamedia.com](mailto:Justyna.Makowiecka@ultimamedia.com) or telephone +44 20 8987 0900

Requests will be dealt with by the Data Protection Manager, and will be responded to within a reasonable period, not longer than 30 days.

If you are not satisfied with the way your request was handled, you have the right to lodge a complaint with the supervisory authority – details of which are given below:

Information Commissioner's Office

<https://ico.org.uk/concerns/>

Telephone: +44 303 123 1113

## **9. Changes to the privacy policy**

If we make changes to our privacy policy we will show you what they are here. If these changes are significant, we may also choose to email relevant individuals with new details. If we are required by law, we will obtain your consent to make these changes.

### **Changes to this policy by date**

January 2018 – New company privacy policy created.