



## PRIVACY NOTICE

This website is owned and administered by Creative Technology Limited (“CT” or “we”). This notice describes CT’s and its affiliates’ use of your data.

The primary purpose of this website is to be a dynamic resource and business tool to help inform you about CT’s services, products and business. We want you to feel secure when visiting our website, and we are committed to maintaining the privacy of any information you may provide us through this website. This Privacy Notice describes how we collect, use, share and safeguard personal information provided to us.

We would like to emphasize that we take the protection of your privacy and your personal data very seriously and that we process your data in accordance with applicable data protection law. We would like to explain to you below in more detail which personal data we collect in connection with this Website and how we use this data.

### What data do we collect?

We collect and process personal data about you when you interact with us. This includes:

- your name, age, gender or personal identity;
- location;
- phone number;
- email address;
- contact or marketing preferences (including any consents you have given us);
- educational and employment background;
- job interest data;
- personal or professional interests;
- demographics;
- experiences with our services and products; and
- information related to the browser or device you use to access our website.

“Non-personal information” is data about website usage and operations that is not associated with a specific personal identity. CT collects and analyses non-personal information to evaluate how visitors use the CT website. Non-personal information we collect may include the pages visited on the CT website; unique URLs visited within **www.ct-group.com** and other sites we may add going forward; and the browser type and IP address of visitors to the CT website. CT’s website and webpages use cookies, web beacons and other technologies for data analysis and personalization services.

## For what purposes do we use your data?

We process this personal data for the following purposes:

- to understand better your needs and interests and to provide you with better services and products. Once you choose to provide us with personal information, it will be used to support your customer or other relationship with CT.
- As required to establish and fulfil a contract with you. This may include verifying your identity, taking payments, communicating with you, providing customer services and arranging the delivery or other provision of products, goods or services;
- As required by CT to enable our business and pursue our legitimate interests, in particular, we use your data for the following further purposes:
  - we will use your information to provide services you have requested, and respond to any comments or complaints you may send us;
  - we monitor use of our products and services, and may use your information to help us monitor, improve and protect our products, content, services and websites;
  - we may use information you provide to personalise our products or services for you;
  - we may monitor any customer account to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law; and
  - we may use your information to invite you to take part in market research.
- Compliance with applicable laws and protection of CT's legitimate business interests and legal rights, including, but not limited to, use in connection with legal claims, compliance, regulatory, investigative purposes (including disclosure of such information in connection with legal process or litigation).

In addition, we may send you direct marketing communications in relation to our relevant products and services, or other products and services provided by us, our affiliates and carefully selected partners. Where required, these will be sent where you have given your consent (where permissible). Where you have been given an opportunity to opt out, you will be able to opt-out of electronic direct marketing by following the instructions in the communication.

## Who will we share this data with?

We may share your personal data with group companies and third parties, e.g. Affiliates of CT (meaning any company, corporation or other entity that directly or indirectly controls, or is controlled by, or is under common control with CT) as necessary to provide services or products to you or for the internal operations of CT. CT will not sell, rent or lease your personal information to others.

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws.

Personal data may also be shared with third party service providers, who will process it on behalf of CT for the purposes above. Such third parties include, but are not limited to, providers of website hosting, maintenance, call centre operation, identity checking etc.

In the event that the business is sold or integrated with another business, your details will be disclosed to our advisers and any prospective purchaser's adviser and will be passed to the new owners of the business.

## **Where will we send your data?**

Personal information provided to CT may be transferred across state and country borders for the purposes of data consolidation, storage and simplified information management. Non-personal information gathered from CT's website is aggregated for reporting about usability, performance and effectiveness. It is used to improve the customer experience and the usability and content of the website and of the services and products CT provides.

Where information is transferred outside the EEA, and where this is to a CT affiliate or vendor in a country that is not subject to an adequacy decision by the EU Commission, data is adequately protected by EU Commission approved standard contractual clauses, an appropriate Privacy Shield certification or a vendor's Processor Binding Corporate Rules.

## **How do you protect my data?**

CT takes all technical and organizational measures required by law for the protection of your data in accordance with the current, general state of the art in technology, especially to protect the data against loss, falsification or access by unauthorized third persons.

We strive to maintain our high standards of security, however the transmission of information via the internet is not completely secure. So, whilst we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Website. Any transmission is at your own risk. Once we have received your personal data we will use strict procedures and security features to prevent unauthorised access.

## **What rights do you have in relation to your data?**

You may be entitled to ask CT for a copy of your information, to correct it, erase or restrict its processing, or to ask us to transfer some of this information to other organisations. You may also have rights to object to some processing activities, such as the profiling we may perform for the purposes of direct marketing, and, where we have asked for your consent to process your data, to withdraw this consent. These rights may be limited in some situations – for example, where we can demonstrate that we have a legal requirement to process your data. In some instances, this may mean that we are able to retain data even if you withdraw your consent.

Where we require personal data to comply with legal or contractual obligations, then provision of such data is mandatory: if such data is not provided, then we will not be able to manage our contractual relationship, or to meet obligations placed on us. In all other cases, provision of requested personal data is optional.

We hope that we can satisfy queries you may have about the way we process your data. If you have any concerns about how we process your data, or would like to opt out of marketing, you can get in touch at the contact details provided below.

In the event you have unresolved concerns, you also have the right to complain to a data protection authority. The relevant data protection authority will be the supervisory authority in the same country as the entity with which you have a relationship.

## **How long will you retain my data?**

Where you are a customer, CT will keep your information for the duration of any contractual relationship you have with us, and, to the extent permitted, after the end of that relationship for as long as necessary to perform the purposes set out in this notice. For data about your visits to our websites or applications, CT will retain this data for five years. Laws may require CT to hold certain information for specific periods. In other cases, CT may retain data for an appropriate period after any relationship with you ends to protect itself from legal claims, or to administer its business.

## **Links to Non-CT Websites**

Our website may provide links to third-party websites for your convenience and information. If you access those links, you will leave the CT website. We do not control those websites or their privacy policies or practices, which may differ from ours. The personal information you choose to provide to any third parties through their websites is not covered by this Privacy Notice. We encourage you to review the privacy policies of companies and websites before submitting any personal information to them.

## **Changes to this Privacy Notice**

CT may change this Privacy Notice at any time. Each time we change this Privacy Notice, we will post the changes in a revised Privacy Notice as it appears on our website.

## **If you have any questions about your data**

The data controller for this processing is the CT entity with which you have a relationship or Creative Technology Limited.

We value your opinions. If you have comments or questions about this Privacy Notice, please send them to **[privacy@ct-group.com](mailto:privacy@ct-group.com)**.