

Website and Marketing Privacy Policy

This privacy policy provides information on how we collect, process and hold your personal data, including any data you may provide when you contact us, submit a query or agree to receive our marketing materials. It is also the main online privacy policy for the website of MBWL International Limited and its subsidiaries, and covers information and services provided through mbwl-int.com.

There may be additional privacy policies and terms and conditions that apply to certain services provided through this website. Please read these at the time you first register for these services.

DATA CONTROLLER

MBWL International Limited is the controller and is responsible for your personal data.

PRINCIPLES

We take your privacy and the protection of your personal data seriously. We will only store, process and disclose your personal data where we have your consent or have a legitimate interest and in accordance with the law. We will make it clear when we collect personal information and will explain what we intend to do with it.

A description of the ways we plan to use your personal data, which of the legal bases we rely on to do so and (where appropriate) what our legitimate interests are is set out below:

- To deliver our services to you and manage our relationship with you
Legal basis: performance of a contract with you, necessary to comply with a legal obligation, and necessary for our legitimate interests (to perform our obligations and provide our services to you)
- To use data analytics to improve our website, services, marketing, client relationships and experiences
Legal basis: necessary for our legitimate interests (to define types of clients for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
- To make suggestions and recommendations to you about services that may be of interest to you
Legal basis: consent, and necessary for our legitimate interests (to develop our products/services and grow our business)
- To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)
Legal basis: necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise), necessary to comply with a legal obligation

Please note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the information referred to above.

We will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

We do our best to protect your privacy through the appropriate use of information security technology.

Our site is accessible on the internet and so any information you post to the site can be accessed from anywhere around the world.

We may share your personal data with our associated firms (including but not limited to Barnett Waddingham LLP, Milliman, Inc., and Lurse Pension and Benefits GmbH and their respective associated companies) to enable them to provide services to you, to contact you regarding services that you have expressed an interest in, and to assist us in responding to your requests. Please note that we may be transferring your personal data to a country that does not have the same data protection laws as your home country. Where we transfer personal data from inside the European Union (EU) to outside the EU, these transfers are subject to appropriate safeguards that are compliant with the General Data Protection Regulation (adequacy decision or Standard Contractual Clauses of the European Commission). We have put in place data protection agreements with our associated firms located outside the EU based on EU Standard Contractual Clauses issued by the European Commission. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EU.

We use third parties in the delivery of our services, for example we use a third party email provider and telecommunications network. We also use third party printing services and we may use a third party to make relevant calls to you. Therefore when consenting to us using your data this may also be provided to those parties. We will only do this to deliver the marketing preferences you have requested. All such parties are under an agreement to ensure the protection of personal data and would be acting on our instructions as a Controller. No such third parties will be authorised to use this personal data for their own or any other purposes.

We may hold your data because we have a legitimate interest, for example you are acting in a professional capacity for which we have clients in common. Where this is the case we will only contact you in relation to those legitimate interests, unless you opt-in to receive marketing information.

WHAT INFORMATION MAY WE HOLD AND HOW WE USE IT

The types of information we collect:

- Personal and business contact information (for example name, organisation name, postal and email address, and telephone number); and
- Other personal information you submit to us, such as information you provide to register for email alerts, dietary requirements for events;
- Other information (including from third parties) that we use to make our own information better or more useful, for example data about organisations, industries, marketing campaigns and other matters related to our business.

Where you contact us in order to make an enquiry or complaint we will collect information from you to enable us to respond.

When someone visits our website we collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. We collect this information in a way which does not identify anyone. We do not make any attempt to find out the identities of those visiting our website unless they log on to one of our secure services or provide us with their information in order to receive specific information from us. We will not associate any information gathered from our website with any personally identifying information from any source.

No automated decision-making is undertaken based on the personal data collected from you.

COOKIES

What are cookies?

Cookies are small text files which store information used by websites. Stored on the visitor's hard drive, the data stored is often used to help improve the functionality of a website. For more information about cookies, please visit the ICO website at <https://ico.org.uk/>.

Use of cookies by MBWL International

The table below explains the cookies used on the MBWL International website (mbwl-int.com).

Cookie	Name	Purpose	More information
Google Analytics	_utma _utmb _utmc _utmz	These cookies are set up by Google to collect anonymous information about site visitors. We use these statistics to focus development of the site to the most relevant browsers and environments.	For information about how Google uses the information or to opt out of Google Analytics, see https://tools.google.com/dlpage/gaoptout
Allow Cookies	cookielaw_accepted	This is set when you accept our cookie policy.	

If you do not wish to receive our cookies you can easily modify your browser settings to refuse cookies, or to notify you when you receive a new cookie. For further instructions on how to stop cookies being installed on your computer, please visit the ICO website at <https://ico.org.uk/>.

CONSENT FOR MARKETING EMAILS

Your contact data will only be used for marketing emails if you have opted-in to receive them.

We may email you occasionally with information or queries about your registration or services you have requested from us, such as attending an event.

LINKS TO OTHER WEBSITES

This policy does not cover links to other websites. You should satisfy yourself of those sites' privacy policy before using their services.

YOUR RIGHTS

- You have the right to obtain confirmation as to whether or not your personal data are being processed.
- You have the right to have your personal data rectified if it is inaccurate or incomplete.
- You have the right to have your personal data deleted or removed if there is no reason for its continued storage and processing.
- You have the right to object to having your data processed. If we believe there is a legitimate business reason for continuing this, we will discuss this with you.
- You have the right to obtain restriction of the processing of your personal data. If we believe the conditions to ask for that restriction are not fulfilled, we will discuss this with you.
- Depending the type of personal data held and the legal bases of processing, you may have the right to request the transfer of your personal data.
- Where you have consented to the processing of your personal data, you have the right to withdraw that consent at any time.

- You have the right to complain to the Information Commissioner's Office (ICO), details below or other relevant supervisory authority.
- Further details about GDPR and your rights under GDPR can be found on the ICO's website at <https://ico.org.uk/> or other relevant supervisory authority's website, details of which can be provided on request.

HOW LONG WILL WE KEEP YOUR PERSONAL DATA?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see "Your rights" above for further information. In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

CHANGES TO THIS PRIVACY POLICY

This policy is kept under regular review and was last updated 15 November 2019.

HOW TO CONTACT US

Requests for information about our privacy policy or complaints can be emailed to data.protection@mbwl-int.com or by writing to us at:

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