

Last Modified: September 23rd, 2019

# Website Privacy Policy

This privacy notice tells you about the information we collect from you when you use our website. In collecting this information, we are acting as a data controller and, by law, we are required to provide you with information about us, about why and how we use your data, and about the rights, you have over your data.

## 1. Who are we?

We are Pole To Win International. Our address is:

Vantage London  
Great West Road  
Brentford, London  
TW8 9AG

You can contact us by post at the above address, by email at [dataprivacy@ptw.com](mailto:dataprivacy@ptw.com) or by telephone on +44 (0) 20 8607 7900.

We are not required to have a data protection officer, so any enquiries about our use of your personal data should be addressed to the contact details above.

Pole To Win International and our affiliates (collectively “Pole To Win”) are committed to protecting your privacy. This Privacy Policy applies to our website <http://www.ptw.com/>. This Privacy Policy governs our data collection, processing and usage practices. By using the website, you consent to the data practices described in this Privacy Policy. If you do not agree with the data practices described in this Privacy Policy, please refrain from accessing or using this site.

Your use of the website will be governed by this policy as applicable to the website together with all policies, notices, guidelines, disclaimers that are published on the website which are incorporated herein by way of reference including but not limited to our Terms of Use, and such other terms as may be applicable to Pole To Win in your capacity as a user of the website. This policy shall be enforceable against you in the same manner as any other written agreement.

This policy constitutes a legal agreement between you, as the user of the website, and Pole To Win, as the owner of the website. You must be a natural person who is at least 18 years of age. If you are less than 18 years of age, please read through this policy with your parent or legal guardian, and in such a case this policy shall be deemed to be a contract between Pole To Win and your legal guardian or parent and to the extent permissible under applicable laws, enforceable against you.

## **2. Important Information**

### **2.1. Changes to this Privacy Policy**

We may update this Privacy Policy from time to time by posting a new version online. You should check this page occasionally to review any changes. This helps you to always be aware of what personal data we collect, how we use it and under what circumstances, if any, it is disclosed. Your continued use of the website, and/or continued provision of Personal Data to us will be subject to the terms of the latest Privacy Policy.

### **2.2. Contact Us**

Please write to us by email at [dataprivacy@ptw.com](mailto:dataprivacy@ptw.com) if you have any enquiries about:

- This Privacy Policy
- Our treatment of any data you provide us
- PTW's General Data Protection Regulation (EU) 2016/679 compliance
- PTW's UK Data Protection Act 2018 compliance
- Requesting a Data Subject Request form
- PTW's Data Subject Request procedures

## **3. Collecting Information**

### **3.1. When you visit our website**

You are free to explore the website without providing any information about yourself. When you visit the website, we collect navigational information, which refers to information about your computer and your visits to this website such as your referral source, length of visit and pages viewed. (See **5. Navigational Information** below.)

In the Careers section, it may be necessary to request that you provide personal data about yourself. This refers to any personal data that you voluntarily submit to us and that identifies you personally, including but not limited to, contact information, such as your name, e-mail address, job title, company name, address, and phone number. (See **4.6 External Websites** below.)

In the Contact section of the website, we also invite you to contact us by email. We use your return email address to respond to your query, including providing you with any requested information about our services, or information about any job vacancies if you have submitted a speculative employment enquiry. We may also email you several times after your enquiry in order to follow up on your area of interest and ensure that we have answered it to your satisfaction. We will do this based on our legitimate interest in providing accurate information prior to a sale or as part of our recruitment process.

The personal data Pole To Win collects from you is stored in one or more databases hosted by third parties located in the United States and Japan, with multiple mechanisms for the legal transfer of Personal Data originating from the EEA and the UK.

We do not use the information you provide to make any automated decisions that might affect you. We keep enquiry emails for two years, after which they are securely archived and kept for seven years, when we delete them. Salesforce.com records are kept for three years after the last contact with you.

### **3.2. Personal data about children**

The website is not intended for or targeted at children, and we do not knowingly or intentionally collect personal data about children. If you believe that we have collected data about a child, please contact us at [dataprivacy@ptw.com](mailto:dataprivacy@ptw.com), so that we may delete the personal data.

## **4. Using Personal Data**

### **4.1. Compliance with our privacy policy**

We use the personal data we collect only in compliance with this Privacy Policy.

### **4.2. We never sell personal data**

We will never sell your personal data to any third party.

#### **4.3. Use of personal data**

In addition to the uses identified elsewhere in this Privacy Policy, we may use your personal data to send information to you which we think may be of interest to you by email, or other means. You may choose to opt out of receiving any such communications by contacting [dataprivacy@ptw.com](mailto:dataprivacy@ptw.com) or by selecting opt-out links in marketing email communications. (See **6. Corrections and Unsubscribing** below.)

#### **4.4. Use of navigational information**

We use navigational information to operate and improve the website and our communications.

#### **4.5. Security of your personal data**

We use a variety of security technologies and procedures to help protect your Personal Data from unauthorized access, use or disclosure. We secure the Personal Data you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure.

#### **4.6. External websites**

Our website provides links to other websites. We do not control the content or practices of these other websites. Our provision of such links does not constitute our endorsement of these other websites, their content, their owners, or their practices. This Privacy Policy does not apply to these other websites, which are subject to any privacy and other policies they may have.

The Careers page of the Pole To Win Website is hosted by Top Echelon ([www.topechelon.com](http://www.topechelon.com)). By visiting the Careers page, you agree to their data policies or their [Privacy Policy](#). We do not control the practices of their pages.

#### **4.7. Retention of personal data**

We retain personal data that you provide us for two years, as long as we consider it non-sensitive, and relevant to our commercial purposes based on the principles of Legitimate Interest, and then we securely delete the information. We will delete this information from the servers at an earlier date if you so request, as described in **6. Corrections and Unsubscribing** below.

#### 4.8. International transfer of personal data

Personal data and navigational information are securely stored in the United States. To facilitate our global operations, we may access personal data and navigational information from locations around the world. This Privacy Policy shall apply even if we access personal data and navigational information from other countries.

To ensure that your personal information does receive an adequate level of protection, we have put in place the following appropriate measures to ensure that your personal information is treated by those parties in the United States in a way that is consistent with and which respects the EU and UK laws on data protection:

a) Standard Contract Clauses

If you require further information about this protective measure, you can request it from [dataprivacy@ptw.com](mailto:dataprivacy@ptw.com).

b) EU-US Privacy Shield

Pole To Win America, Inc. complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. Pole To Win America has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>

In compliance with the Privacy Shield Principles, Pole To Win America commits to resolve complaints about our collection or use of your personal information. EU & UK individuals with inquiries or complaints regarding our Privacy Shield policy should first contact **Pole To Win UK Limited** at:

[Marion.Muir@ptw.com](mailto:Marion.Muir@ptw.com)

or by mail to  
Marion Muir  
c/o Pole To Win UK Limited  
9/2 Skypark 1  
8 Elliot Place  
Glasgow G3 8EP  
Scotland, U.K.

Pole To Win America has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints concerning human resources data transferred from the EU in the context of the employment relationship.

c) Non-Compliance with the EU-US Privacy Shield

The non-compliance with the EU-US Privacy Shield will result in Pole To Win America subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

The possibility, under certain conditions, for the individual to invoke binding arbitration.

The requirement for Pole To Win America to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

d) Accountability for Onward Transfer of Personal Data

In cases of onward transfer to third-party, Pole To Win will notify you and will provide an opportunity to opt-out of sharing with the third-party prior to disclosing your personal information. PTWI will enter into a contract with each relevant party (Controller or Processor) to only process your personal information for limited and specified purposes consistent with the consent provided by you. PTWI will ensure that the third-party will provide the same level of protection to your personal information as is required by the EU-US Privacy Shield Principles.

In the context of an onward transfer Pole To Win has responsibility for the processing of personal information it receives under the Privacy Shield and subsequently transfers to a third party acting as an agent on its behalf. Pole To Win remains liable under the Principles if its vendors processes such personal information in a manner inconsistent with the Principles unless it proves that it is not responsible for the event giving rise to the damage.

#### **4.9. Mergers and acquisitions**

If we (or our assets) are acquired by another company, whether by merger, acquisition, bankruptcy or otherwise, that company would receive all information gathered by Pole To Win International on the website.

#### 4.10. Compelled disclosure

We reserve the right to use or disclose your personal information if required by law or if we reasonably believe that use or disclosure is necessary to protect our rights or to comply with a law, court order, or legal process.

## 5. Navigational Information

### 5.1. Cookies

Pole To Win uses third party cookies to keep track of the pages you visit within the website, in order to determine what portion of the Pole To Win International website is the most popular, or most used, and to provide you with a better experience.

A cookie is a small text file that is placed on your hard disk by a web server. Cookies are not used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a Web server in the domain that issued the cookie to you. For more information on cookies: <http://www.whatarecookies.com>

You have the ability to refuse cookies by modifying your browser settings.

When you use our website to browse our services and view the information we make available, a number of cookies are used by third parties to allow the website to function, to collect useful information about visitors and to help to make your user experience better. These cookies are shown below.

Cookie Name	Purpose	Provider	Type	Expiration Time
_ga	Used to distinguish users	Google Analytics	Analytical	2 years
_gid	Used to distinguish users	Google Analytics	Analytical	24 hours
_gat	Used to throttle user request rate	Google Analytics	Functional	1 minute

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Cookie Name	Purpose	Provider	Type	Expiration Time
WP34699	Tracks visitor activity, such as page views, and can correlate that activity with personally identifiable information voluntarily submitted through visitor-initiated means e.g. when a visitor reaches this website by following a link in an email marketing message	Act-On	Persistent	Remains until the browser cache is cleared
Craft_CSRF_Token	Provides built-in protection against Cross-Site Request Forgery attacks	Craft CMS	Functional	Session length
CraftSessionID	Used to track a user's recent activity, last visit and general site movements	Craft CMS	Analytical	Session length
_cfduid	Identifies individual clients behind a shared IP address and applies security settings on a per client and device basis, without storing any personally identifiable information	Cloudflare	Functional	Session length

### 5.2. Google Analytics

Pole To Win also uses the web analytics service, Google Analytics. Google Analytics is a web analytics service provided by Google Inc. ("**Google**"). Google Analytics uses cookies and similar technologies to analyse how users use the Domains. The information generated about Domain usage is transmitted to Google in the U.S. This information is used to evaluate visitors' use of the Domain, compile statistical reports on Domain activity, and provide other services related to the Site and Internet use. Google may also collect information about Domain visitors' use of other websites. For more information about Google Analytics, or to opt-out of Google Analytics, please go to <https://tools.google.com/dlpage/gaoptout>.

### 5.3. Log files

Third-party web analytics services such as Google Analytics may collect anonymous demographic information, such as your ZIP code, age, gender, preferences, interests

and favourites using log files that are not associated with your name or other personally identifying or sensitive information. There may also be information about your computer hardware and software that is automatically collected which can include: your IP address, browser type, domain names, access times and referring website addresses. This information may be used by Pole To Win to provide general anonymous statistics regarding use of the Pole To Win Website.

#### **5.4. Third party tracking technologies e.g. web beacons**

We employ a marketing automation software technology called Web Beacons from [www.act-on.com](http://www.act-on.com) to track and in some cases, recognize visitors to our website. This helps us to continually improve the quality and relevance of our sales and marketing processes by understanding which pages, content or areas of our business are most engaged by different segments of visitors. Web beacons are tiny graphics with a unique identifier, which function similarly to cookies, but are not stored on a user's computer hard drive as with cookies, but instead are embedded invisibly on website pages or in emails. These help us to understand which of our HTML-based emails have been opened by recipients which enables us to analyse and continually improve the effectiveness, relevance and suitability of marketing communications and campaigns engaged by different customer segments. The technology can then enable us to tie the engagement information from emails and website visits with some customers' non-sensitive information such as name, email address and company.

## **6. Corrections and unsubscribing**

### **6.1. Your rights as a data subject**

By law, you can ask us what information we hold about you, and you can ask us to correct it if it is inaccurate. If we have asked for your consent to process your personal data, you may withdraw that consent at any time.

If we are processing your personal data for reasons of consent or to fulfil a contract, you can ask us to give you a copy of the information in a machine-readable format so that you can transfer it to another provider.

If we are processing your personal data for reasons of consent or legitimate interest, you can request that your data be erased.

You have the right to ask us to stop using your information for a period of time if you believe we are not doing so lawfully.

Finally, in some circumstances you can ask us not to reach decisions affecting you using automated processing or profiling.

To submit a request regarding your personal data by email, post or telephone, please use the contact information provided above in the **Who Are We** section of this policy.

## **6.2. To unsubscribe from our marketing communications**

You may unsubscribe from our marketing communications by clicking on the "opt-out" or "unsubscribe" links located at the bottom of our marketing e-mails, or by sending an email to [dataprivacy@ptw.com](mailto:dataprivacy@ptw.com)

## **6.3. Your right to complain**

If you have a complaint about our use of your information, we would prefer you to contact us directly in the first instance so that we can address your complaint. However, you can also contact the Information Commissioner's Office via their website at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) or write to them at:

**Information Commissioner's Office**  
Wycliffe House Water Lane Wilmslow Cheshire  
SK9 5AF

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence.

## **6.4. Updates to this privacy policy**

We regularly review and, if appropriate, update this privacy policy from time to time, and as our services and use of personal data evolves. If we want to make use of your personal data in a way that we haven't previously identified, we will contact you to provide information about this and, if necessary, to ask for your consent.

We will update the version number and date of this document each time it is changed.