

Fourth – Website and Marketing Data Protection Notice

Who does this policy apply to?

This policy sets out how we handle personal data that we control in the course of operating our business. It includes information obtained through the website under the domain www.fourth.com (the “Website”) and information used for Fourth’s marketing and Client Relationship Management (“CRM”) purposes, but excludes information processed by us as part of the Fourth Solution.

Who does this policy not apply to?

- **If you are a Customer of Fourth** (or an employee of one of our Customers) this policy will not apply (except to the extent that the processing of your information relates to Fourth’s marketing or CRM purposes). For all other uses of your data, please refer to your Subscription Agreement or our Data Processing Agreement and Privacy Policy.
- **If you are an employee of one of our Customers** and have any questions **about payroll or other data** that are processed by Fourth on behalf of your employer, any enquiries should be addressed directly towards your employer.

Please note that this policy does not apply to the practices of companies that Fourth does not own or control, or to people that Fourth does not employ, engage or manage.

HOW WE USE YOUR INFORMATION

Who we are

Fourth Limited of 90 Long Acre, Covent Garden, London, WC2E 9RA (“we” or “us”) may collect, store and process your personal data. By way of example, this includes your name, contact details (address, email address, phone number etc), the products and services you are or may be interested in, and any comments you make about our products.

What we do with your data

We will keep your details on file for direct marketing purposes and we may send you newsletters, updates and mailshots about our products, services and events by email. We may also contact you by telephone, text message, post or by any other method of communication. We use your data in order for us to contact you directly about products and services we think you may be interested in, and will do so in line with your stated preferences where you have provided these to us. We also collect information from your usage of the Website in order to tailor the products and services which we offer to you. We will use your data for Fourth’s legitimate interests of our direct marketing purposes. Your correspondence with Fourth personnel may also be monitored for internal training and compliance purposes.

In the case of existing clients, we process your personal data on the basis of our legitimate business purpose in marketing our products and services, understanding your needs, developing our products and services and managing our relationship with you. We may also use your data to contact you by email about a case that you have raised in relation to the provision of our Services, including for administrative purposes.

Third parties and your data

We may in limited circumstances (for example where you sign up for an event at which we are partnering with a third party, or where we believe an event in which we are involved would be of interest to you) pass on your information to third parties for them to use for their own purposes. We may share your details with third party service providers so that they can provide specific services to us or to you (for example to send out newsletters and emails on our behalf, to complete lists, or manage lists for our events, or in the provision of joint events or webinars that we organise with third parties, or to conduct direct marketing on Fourth's behalf). Where we share your details with third party service providers which provide specific services to us we will remain responsible for your data.

Where do we get your data from?

We obtain data from a variety of sources, including directly from individuals, from publicly available information, lists from marketing events, and from our chosen third party providers.

Keeping your data secure

We will, at all times ensure that we keep your personal data secure in line with our obligations under applicable data protection and privacy law, We will ensure that any organisations that use your information on our behalf will do the same.

Where your data is transferred

We are based in the UK, although we do also operate in the United States, Dubai and within the EU. Your details may therefore be processed in the UK, US and any other countries in which we operate, either now or in the future. We may share your personal data with our group companies and service providers based in countries outside the EEA but only to those countries which have an adequate level of protection for your personal data or where there are appropriate safeguards in place. Further details are available upon request.

How long do we keep your data?

From time to time we will review our marketing lists and if we no longer consider that you are interested in our products or services then we will remove it from our systems. In the event that you move company we may specifically retain, and use, your information for our direct marketing purposes if we consider that you may still be interested in our products or services.

Your rights

You may opt out at any time by clicking on the unsubscribe link at the bottom of any email that we send you and updating your preferences. Alternatively, you may send an email to privacy@fourth.com stating that you do not wish to receive any further marketing material from us.

You have the right to request access to your information, as well as rectification or deletion of it, or to restrict the processing of information about you and the right to data portability.

It is not a statutory or contractual requirement that you provide us with your information and you are not obliged to provide it to us. However, if you do already work with us or if you do work with us in the future, we will require some information from you in order to provide you with our services and in order to meet your expectations.

If you would like to make a complaint about the way that your data is being processed by us then you may contact the Information Commissioner's Office. Alternatively, our Data Protection Officer can be contacted at security@fourth.com.

For more information about how we handle information which we process on your behalf please contact privacy@fourth.com.

USE OF OUR WEBSITE

By using our Website you confirm that you accept these terms of our Website. If you do not, please do not use our Website.

Use of IP Addresses and Cookies

For security purposes Fourth automatically records the IP address of your computer each time you visit the Website.

Cookies are small text files that we can transfer to your computer through your web browser if you agree to enable our systems to 'remember' who you are and to provide you personalised features and also allows us to improve the Website. Fourth may set and access cookies on your computer if you allow us to. For example, a cookie may be used if you wish your computer to recall your log in details each time you visit the Website. For more information about the Cookies we use, please refer to our [Cookie Policy](#). You may at any time turn off cookies in your browser.

Links to third party websites

Our Website contains links to other websites. Fourth is not responsible for the privacy practices, the content or terms of these websites. We recommend that you examine the privacy policies and terms of these third party websites to understand their procedures for collecting, using and disclosing you information.

Changes to this policy

We reserve the right to change this policy at any time without prior notice. If we decide to change our policy, we will post an updated policy to www.fourth.com/agreements and it will be effective from the date of publication.

The Website is owned and operated by Fourth Limited.