



## PRIVACY NOTICE



Stephens Scown LLP, Curzon House, Southernhay West, Exeter EX1 1RS  
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This privacy notice (together with any other documents we refer to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. We take the privacy of your personal data very seriously and all data captured will be used and held in accordance with the requirements of the Data Protection Act 2018.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

### **Who we are**

We (or "us") means Air Marketing Group Limited, a registered limited company (number 10002410) whose registered address is 2 Barnfield Crescent, Exeter, Devon, England, EX1 1QT.

We are registered with the Information Commissioner's Office as a data controller under number ZA290043.

Our contact details can be found [here](#).

By contacting us, using our Services or visiting our website, which is owned and controlled by us ("our site"), you are accepting and consenting to the practices described in this notice unless you inform us otherwise.

### **Who this notice applies to**

This notice applies to all users of our site, services and any individual who interacts with us.

We may monitor, record, store and use any telephone, email or other communication with you in order to check any instructions given to us, for training purposes, for crime prevention and to improve the quality of our customer service.

### **Information we collect from you**

#### **The legal basis on which we rely are:**

##### Consent

For email marketing we will use consent, this will usually be in the form of an opt-in tick box, or when you submit an email address expressly for the reason of sending marketing. We will always make it clear what your data will be used for and provide a link to our privacy policy. You can change your mind at any time.

##### Contract

Processing of your personal data is necessary for us to administer the pre-contract and contractual relationship between ourselves and our suppliers/members in connection with the performance of a contract.

##### Legitimate interests

We will use legitimate interests to send occasional marketing by post and for segmentation and profiling in order to send relevant targeted communications. Our legitimate interests are to communicate with our members to keep them informed, to grow our business and promote best practice in the marketing industry.

We may collect and process the following data about you:

### **Information you give us**

You may give us information about you by filling in forms on our site, when accessing our Services or by corresponding with us by phone, email, or social media. This includes information you provide if you register to use our site, subscribe to our service, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey, and when you report a problem with our site. The information you give us may include your name, address, email address and phone number, employer, financial information and personal description.

### People who contact us via social media

We use a third-party provider, Hootsuite to manage our social media interactions. If you send us a private or direct message via social media the message will be stored by Hootsuite for three months. It will not be shared with any other organisations.

### People who call us

When you call our office number, we record all of our calls for training and monitoring purposes. These call recordings are then saved in a secure encrypted cloud-based location with limited access. They are only saved for as long as they are relevant and then they are destroyed.

### People who email us

All emails that are sent to us are monitored, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

### People who make a complaint

When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide.

We usually have to disclose the complainant's identity to whoever the complaint is about. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

## People who use Air services

Air Marketing Group offers a range of Business Development services to business in the UK.

We have to hold the details of the people who have requested the service in order to provide it. However, we only use these details to provide the service the person has requested and for other closely related marketing purposes. For example, we might use information about people who have requested a service to carry out a survey to find out if they are happy with the level of service they received. When people do subscribe to our services, they can cancel their subscription at any time and are given an easy way of doing this.

## **Information we collect about you**

We collect the following information:

technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;

information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

## Visitors to our website

When someone visits [www.air-marketing.co.uk](http://www.air-marketing.co.uk) we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behavior patterns. We do this to find out things such as the number of visitors to certain parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

## E-Newsletter

We use a third-party provider, MailChimp, to deliver our e-newsletters and email campaigns. We gather statistics around email opening and clicks using industry standard technologies to improve our email communications. For more information, please see [MailChimp's privacy notice](#).

## Website visitor tool

We use a third-party provider, Lead Forensics, to provide us with data on the Internet Protocol (IP) address that visits the site and what pages are viewed, time is spent and how many visits are carried out. This tool only identifies the IP address not any personal information. For more information, please see [Lead Forensics' privacy notice](#).

## WordPress

We use a third-party service, wordpress.com, to manage our website. This site integrates with our Google Analytics tool to collect anonymous information about users' activity on the site, for example the number of users viewing pages on the site, to monitor and report on the effectiveness of the site and helps us improve it. For more information, please see the [privacy notice for Wordpress](#).

## **Information we receive from other sources**

We also work with third parties (including, for example, business partners, sub-contractors, advertising networks, analytics providers, and search information providers) and may receive information about you from them. The information we receive from these third parties will be information that they have collected from you.

We may receive information about you from third parties (for example, other individuals/ organisations who use our Services or who have asked us to provide our Services to you). When that data is collected from you, you should be informed by those third parties at that stage that it may be shared with us and may be combined with data collected from multiple sources.

## **How we use your information**

We may combine information we collect about you and receive from other sources with information you give to us. We may use any part of the information and/or the combined information for the purposes set out above and as set out in the examples below, (depending on the types of information we receive).

We use information held about you in the following ways:

- To provide you with our Services;
- To notify you about changes to our Services;
- To ensure that content from our site is presented in the most effective manner for you and for your device;
- Where you have indicated to us that you are happy for us to do so, we may also use this information to provide you (or permitted third parties) to provide you with information about;
  - other services we offer that are similar to those that you have already enquired about or receive, or have received, from us;
- Administer our Services, and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- To improve our site and Services to ensure that content is presented in the most effective manner for you and for your device;
- Allow you to participate in interactive features of our Services, when you choose to do so;
- Keep our Services, site and premises as safe and secure as we can;
- And, measure or understand the effectiveness of our Services.

## **Disclosure of your information**

You agree that we can share your personal information with:

- Analytics and search engine providers that assist us in the improvement and optimisation of our site;
- Our suppliers, sub-contractors, clients or for the performance of any contract we enter into with those parties to allow us to provide services to you (including but not limited to the Services), and only where they are under a duty to deal with your personal data in accordance with the Data Protection Act 1998 and the General Data Protection Regulation ((EU) 2016/679).
- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or terms and conditions of supply of services and other agreements; or to protect the rights, property, or safety of Air Marketing Group Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

### **Job applicants for Air**

Air is the data controller for the information you provide during the process unless otherwise stated. If you have any queries about the process or how we handle your information, please contact us at [contact@air-marketing.co.uk](mailto:contact@air-marketing.co.uk).

#### What will we do with the information you provide to us?

All of the information you provide during the process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary.

We will not share any of the information you provide during the recruitment process with any third parties for marketing purposes or store any of your information outside of the European Economic Area. The information you provide will be held securely by us and/or our data processors whether the information is in electronic or physical format.

We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for.

#### What information do we ask for, and why?

We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

The information we ask for is used to assess your suitability for employment. You don't have to provide what we ask for, but it might affect your application if you don't.

#### Application stage

We ask you for your personal details including name and contact details. We will also ask you about your previous experience, education, referees and for answers to questions relevant to the role you have applied for. The recruiting manager will have access to all of this information.

You will also be asked to provide equal opportunities information. This is not mandatory information – if you don't provide it, it will not affect your application. This information will not be made available to any staff outside of those relevant, in a way which can identify you. Any information you do provide, will be used only to produce and monitor equal opportunities statistics.

### Shortlisting

Our hiring managers shortlist applications for interview. They will be provided all details relevant for the interview, but this will not be disclosed to anyone except those involved in the interview process.

### Assessments

We might ask you to participate in assessment days; complete tests or occupational personality profile questionnaires; and/or to attend an interview – or a combination of these. Information will be generated by you and by us. For example, you might complete a written test, or we might take interview notes. This information is held by Air.

If you are unsuccessful following assessment for the position you have applied for, we may ask if you would like your details to be retained in our talent pool for a period of six months. If you say yes, we would proactively contact you should any further suitable vacancies arise.

### Conditional offer

If we make a conditional offer of employment we will ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We are required to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability.

You will therefore be required to provide:

Proof of your identity – you will be asked to attend our office with original documents, we will take copies.

We will contact your referees, using the details you provide in your application, directly to obtain references

If we make a final offer, we will also ask you for the following:

Bank details – to process salary payments

Emergency contact details – so we know who to contact in case you have an emergency at work

### How long is the information retained for?

If you are successful, the information you provide during the application process will be retained by us as part of your employee file for the duration of your employment plus 6 years following the end of your employment. This includes your criminal records declaration, fitness to work, records of any security checks and references.

If you are unsuccessful at any stage of the process, the information you have provided until that point will be retained for 6 months from the closure of the recruitment process.

Information generated throughout the assessment process, for example interview notes, is retained by us for 6 months following the closure of the recruitment process.

Equal opportunities information is retained for 6 months following the closure of the campaign whether you are successful or not.

### **Where we store your personal data**

The data that we collect from you will be stored within the UK. By providing us with your personal data, you agree to this storing and/or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

All information you provide to us is stored on our secure servers or on secure servers operated by a third party. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of data and information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted via our Services or sites; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try and prevent unauthorised access.

### **Your rights**

You have the right to ask us not to process your personal data for marketing purposes when you provide us with your data and you can change your mind at any time by contacting us. We will ask for your permission if we intend to disclose your information to any third party for marketing purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. If you have given us permission to disclose information about you to a third party, you may revoke that permission at any time by contacting us.

Our site may, from time to time, contain links to and from the websites of our clients, partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

### **Data retention**

We will not store your personal data for any longer than is necessary.

### **Access to information**

You have the right to access information held about you. Your right of access can be exercised in accordance with the Data Protection Act 1998 (or any equivalent legislation). Individuals can find out what personal information we hold by making a 'subject access request'. If we do hold information about you, we will:

- give you a description of it;
- tell you why we are holding it;



tell you who it could be disclosed to;  
and let you have a copy of the information in an intelligible form

To make a request to Air for any personal information we may hold you need to put the request in writing to the address provided below.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

If we do hold information about you, you can ask us to correct any mistakes by, once again, contacting us.

### **Disclosure of personal information**

In many circumstances we will not disclose personal data without consent. However, when we investigate a complaint, for example, we will need to share personal information with the individual concerned and with other relevant bodies.

You can also get further information on:

- circumstances where we can pass on personal data without consent for example, to prevent and detect crime and to produce anonymised statistics;
- our instructions to staff on how to collect, use and delete personal data;
- and how we check that the information we hold is accurate and up to date.

### **The right to lodge a complaint to the supervisory authority**

If you are unhappy with any aspect of our handling of your data, you can make a complaint to the Information Commissioner's Office, by [clicking here](#).

### **Changes to our privacy notice**

Any changes we may make to our privacy notice in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy notice.

### **How to contact us**

If you would like to request information about our privacy notice, you can [email us](#) or write to us at:

Air Marketing Group Limited  
Ground Floor, The Forum  
Barnfield Road  
Exeter  
EX1 1QR