

# Privacy Policy

## When is personal data collected?

Personal data will be collected on a variety of occasions, including:  
Requests, complaints and/or disputes.

## Participation in marketing programs or events:

- Signing up for loyalty programs and membership schemes
- Event and Campaign management
- Online games or competition
- Subscription to newsletters, in order to receive offers and promotions via email.
- Sponsorship request
- Social events (CSR)
- Transmission of information from third parties:
- Internet activities:
- Connection to our organisation websites (IP address, cookies)
- Online forms (web queries, online reservation, questionnaires, our organisation pages on social networks, network login devices such as Facebook login etc.)

## How will Purple Grey Marketing use the information it collects from me?

We collect your personal data for a number of purposes including the following:

- Meeting our obligations to our clients
- Creation and storage of legal documents in compliance with accounting standards.
- Improving our services, especially:
- Processing your personal data in our client marketing program in order to carry out marketing operations, promote brands and gain a better understanding of your requirements and wishes \*
- Adapting our products and services to better meet your requirements
- Customising commercial offers and the promotional messages we send to you through various channels \*
- Informing you of special offers and any new services created by our organisation or one of our entities \*
- Managing claims/ complaints

## Managing our relationship with clients:

- Providing details for the client database
- Predicting and anticipating future behaviours
- Developing statistics and commercial scores and carrying out reporting
- Providing context data for the offer push tool when a client visits a Purple Grey Marketing's website.
- Sending you newsletters\*, promotions and offers\*, or contacting you by telephone
- Managing requests to unsubscribe from newsletters, promotions and offers
- Taking into account the right to object

Use a trusted third party to allow us to send you promotional offers.

## Disclosure of personal information

To provide you with the best-individualised service, we have to share your personal data with internal and external recipient subject to the following conditions:

Within Purple Grey Marketing, in order to offer you the best service, we can share your personal data and give access to authorised personnel, including:

- Purple Grey Marketing employees
- Finance department
- Internal Audit department

Local authorities: We will also be obligated to send your information to local authorities if this is required by law or as part of an inquiry and in accordance with local regulations.

Purple Grey Marketing does not routinely disclose personal information to other organisations unless:

- Required by law.

### **Collection of other information**

“Other Information” is any information that does not reveal your specific identity or does not directly relate to an individual, such as:

- Browser and device information
- Demographic information and other information provided by you

### **Through your browser or device:**

Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version and the name and version of the Online Services (such as the Apps) you are using. We use this information to ensure that the Online Services function properly.

Through your use of the Apps: When you download and use an App, we and our service providers may track and collect App usage data, such as the date and time the App on your device accesses our servers and what information and files have been downloaded to the App based on your device number.

### **Using cookies:**

You may view our Cookie policy on our website for more information.

Using pixel tags and other similar technologies:

Pixel tags (also known as web beacons and clear GIFs) may be used in connection with some Online Services to, among other things, track the actions of users of the Online Services (including email recipients, Facebook, etc.), measure the success of our marketing campaigns and compile statistics about usage of the Online Services and response rates. We also use Google Analytics which uses cookies and similar technologies to collect and analyse information about use of the Services and report on activities and trends. These services may collect information regarding the use of other websites, apps and online resources.

### **IP Address:**

#### **Your IP address is a number**

that is automatically assigned to the computer that you are using by your Internet Service Provider (ISP). An IP address may be identified and logged automatically in our server log files whenever a user accesses the Online Services, along with the time of the visit and the page(s) that were visited. Collecting IP addresses is standard practice and is done automatically by many websites, applications

and other services. We use IP addresses for purposes such as calculating usage levels, diagnosing server problems and administering the Online Services.

We may also derive your approximate location from your IP address.

### **How long will Purple Grey Marketing keep my information?**

We retain your personal data only for the period necessary for the purposes and in accordance with our Data Retention Policy and with the provisions of applicable laws.

### **What right do i have over my personal information?**

Under the General Data Protection Regulation and DPA 2017, you have the right to:

- Access your personal data by making a subject access request
- Rectification, erasure or restriction of your information where this is justified
- Object to the processing of your information where this is justified
- Data portability

### **To be informed**

An identified or identifiable individual, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual;  
Access

Please send a written request if you would like confirmation that your data is being processed by us and to receive a copy of your data. We will do utmost to provide the data in a portable format.

Rectification, Erasure or Restriction of Processing

You have the right to request us to inaccuracies and complete your personal data. You can also request to erase your data where the data are no longer necessary in relation to the purpose for which the personal data was collected, you have withdrawn your consent, you have objected to processing or the data have been unlawfully processed.

### **To Object**

You have the right to object to the processing of your personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of a legal claim.

We shall stop the processing of any data, which has been obtained through your express consent upon you withdrawing such consent in writing to the Data Protection Officer.

Not to be subject to automated decision-making including profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or which significantly affects you.

### **The above shall not apply where the decision is:**

- Necessary for entering into, or performing, a contract between you and Purple Grey Marketing;
- Authorised by a law to which Purple Grey Marketing is subject and which lays down suitable measures to safeguard

your rights, freedoms and legitimate interests; or Based on your explicit consent.

### **Purple Grey Marketing external privacy policy**

#### **HOW TO CONTACT US?**

To exercise your rights, please contact the Purple Grey Marketing Data Protection Officer using the following contact details:

Data Protection Officer

Purple grey marketing.  
200, SSR Ave, Morc. St Jean, Quatre Bornes -  
Email: [hello@purplegreymarketing.com](mailto:hello@purplegreymarketing.com)

For the purposes of confidentiality and personal data protection, we will need to identify you in order to respond to your request.

You will be asked to include a copy of an official piece of identification, such as a driver's license or passport, along with your request.

In some cases, we may also request an administrative fee to cover the cost of access.

We will try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests.

In this case, we will notify you and keep you updated.

You have the right to complain to the Data Protection Office under the DPA 2017 or any supervisory authority under the GDPR.

### **Updates**

We may modify this policy from time to time. Consequently, we recommend that you consult it regularly.

Purple Grey Marketing operates in a dynamic business environment. Over time, aspects of our business may change as we respond to changing market conditions. This may require our policies to be reviewed and revised. Purple Grey Marketing reserves the right to change its privacy policy at any time and notify you by posting an updated version of the policy on our website.

The amended policy will apply between us whether or not we have given you specific notice of any change.

### **Policy privacy**

Through the online services, you may opt in to receive emails, text messages to the mobile number you provide to us or push notifications from Purple Grey Marketing. When you opt in to any of these types of communications, you understand and consent that you will receive marketing, transactional and other messages from Purple Grey Marketing.

We will ensure reasonable technical and organisational measures are in place to protect your personal data against alteration or accidental or unlawful loss, or unauthorized use, disclosure or access

### **Disclaimer**

The mentioned notices, terms and conditions may change from time to time without prior notice.