

Who we are:

Aspect Ltd (incorporated in England and Wales under company number 3445712) is based at Unit 7, Hampstead West, 224 Iverson Road, London, NW6 2HL. We are a global events and communications agency, specialising in audio video, production, creative design, message and content development, audience engagement and interaction, presenter scripts and presenter support, logistics and event management, venue sourcing, leadership coaching, video and animation, technical, environment design, rehearsal management, digital expertise.

Aspect operates conscientiously within the requirements of the General Data Protection Regulations 2018 and other electronic marketing legislation. We work within the principles of fair data processing, namely:

- Using information in a way that people would reasonably expect.
- Thinking about the impact of our processing.
- Being transparent and ensuring that people know how we will use their information.

This statement (together with our [Terms and Conditions](#)), which will be updated at regular intervals, sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us, as **data controller** and a **data processor**.

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

1. What This Privacy Statement Covers

This statement covers how we treat any personal information that we collect and receive either from our website or as part of our broader operating processes.

We do not sell or pass on any personal information about our clients or prospects and we only use any information shared with us for running and improving our services and in that capacity operate as a data controller and, in the extent that we process the data, as a data processor.

This statement tells you what information we collect, the steps we take to protect and secure it, how we use and share information, and finally, how you can contact us with questions or concerns.

2. Information We Collect

(a) Personal Information. We collect personal information (e.g., name, email address, phone number, etc.) when you:

- Send us an enquiry through our website
- Email us
- Work with us as a customer, supplier or employee

(b) Other User Information. When you access and use our services, we may collect additional contextual information about your company as well as your design and aesthetics preferences. We do not link this additional data to any other information we collect about you and do not undertake any profiling activity.

(c) Billing Information. If you contract us for event services, we will require your billing information in order to process the transaction. Billing information includes your name, address, bank details and other information necessary to process the transaction.

(d) IP Addresses and Cookies. We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration. This is statistical data about our users' browsing actions and patterns, and does not identify any individual. For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. A cookie consists of information sent by a web server to a web browser, and stored by the browser. The information is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser. We use both "session" cookies and "persistent" cookies on the website. We will use the session cookies to keep track of you whilst you navigate the website; we will use the persistent cookies to enable our website to recognise you when you visit. Session cookies will be deleted from your computer when you close your browser. Persistent cookies will remain stored on your computer until deleted, or until they reach a specified expiry date.

We use Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website. Google will store this information. Google's privacy policy is available at: <http://www.google.com/privacypolicy.html>.

Most browsers allow you to reject all cookies, whilst some browsers allow you to reject just third party cookies. For example, in Internet Explorer you can refuse all cookies by clicking "Tools", "Internet Options", "Privacy", and selecting "Block all cookies" using the sliding selector. You may refuse to accept cookies by activating this setting on your browser, however, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us, one of our clients or for one of our suppliers. For example, such staff maybe engaged in processing the information you completed on our site for the purpose of stating a question or obtaining an answer during a webcast or in "real time" for a meeting taking place at a location based outside the EEA. By submitting your personal data, you agree to its transfer, storage or processing. We, and the relevant client for whom we are processing the data will take all necessary steps that are reasonable to ensure that your data is treated securely and in accordance with this privacy policy.

Any information you provide to us is stored on our secure servers. 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 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 to our site; any transmission is at your own risk.

We use information held about you in the following ways:

- To ensure that content from our site is presented in the most effective manner to you and to your computer
- To provide you with information, requested by you, or which we feel would be of interest to you, on our products or services, following your consent to do so.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To cross reference information you have supplied with information supplied by our client for purposes of verifying whether you are an authorised user.
- To notify you about changes to our service.

We may also contact you by email, post or telephone. Please note that where you have provided sensitive data to us, we shall only use data for the purpose for which the data was provided to us.

If you do not want us to use your data in this way, or wish to withdraw your consent for use of the data, you can do so by contacting us via email team@aspect-communications.com, T: 0208 282 7693 or writing to Unit 7, Hampstead West, 224 Iverson Road, London, NW6 2HL. Please note that at the time you contact us, it may be the case that we no longer process, hold or store your personal information/data as Data Processor, in which case we would advise you of this.

We may disclose your personal information to third parties:

- If we or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred 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 and Conditions and other agreements; or to protect the rights, property, or safety of our clients, customers or others.
- Our site may, from time to time, contain links to and from the websites of our partner networks, clients, affiliates or other external websites. If you follow a link to any of these websites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for these privacy policies. Before you submit any personal data to our site, you may want to check the policies of the clients, for whom we are collecting the data, and whom for your purposes is the data controller. In the absence of any details being listed on our site, you may contact us via the details referenced above.

3. Information Use, Legal Basis, Sharing, Disclosure, and Retention

(a) Use and Legal Basis.

Sales and Service Delivery. Aspect uses personal data for developing and issuing sales proposals and for providing its products and services – and justifies this under the legal basis of “Contract”.

Marketing Emails. Aspect uses personal data to update existing clients and prospective B2B clients with information about our services. We justify this through a “Legitimate Interests” assessment and offer opt-out functionality for those no longer wishing to hear from us in this way.

CCTV and Security. We operate CCTV at our premises – as justified through a “Legitimate Interests” assessment.

Administrative and Legal. We process small amounts of employee and subcontractor data under the legal basis of “Contract” and, if in the Vital Interests of the data subject, or with specific consent, or to comply with Employment or Health and Safety or another Legal requirement will hold special category data such as medical history or driving convictions.

(b) Sharing. Aspect does not share, sell, rent or trade personal information with any third parties for marketing or promotional purposes.

We do share small quantities of employee data for administrative and legal purposes.

Aspect also reserves the right to share data with relevant authorities if compelled to do so to comply with legal obligations. We will use third party payment processors for card transactions to pay for goods and services but these third parties are authorized to use the data only as necessary to provide these services to us and are prohibited from using your personal information for promotional purposes.

(c) Disclosure.

Aspect may disclose personal information under the following circumstances:

- In certain situations, we may disclose personal data in response to lawful requests by public authorities, including but not limited to national security or law enforcement requests. We may also disclose your personal information as required by law, such as to respond to court orders, or similar legal processes, to establish or exercise our legal rights or, defend against legal claims, or if in our judgment in such circumstances disclosure is required or appropriate.
- If we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our various terms of use, or as otherwise required by law.

(d) Retention. We will retain existing customer information for as long as a customer account is active with us or as needed to provide our services – and where required to comply with our legal obligations, resolve disputes, and enforce our agreements. We will retain all prospective customer data ongoing until any such time that we receive a request to opt-out.

4. Confidentiality and Security

We use physical, electronic, and procedural safeguards to protect personal information. Our IT arrangements aspire to “Data Protection by Design” and should be able to **detect** a significant data breach. Where such a breach could result in discrimination, damage to reputation, financial loss, loss of confidentiality or any other significant economic or social disadvantage we will **notify the ICO**. Where a breach is likely to result in a high risk to the rights and freedoms of individual data subjects, we will also **notify those concerned** directly

and at the earliest practical opportunity. We shall then fully **investigate** a data breach and implement corrective action to **prevent recurrence**.

By using our services or providing personal information to us, you are consenting to Aspect communicating with you electronically regarding security, privacy, and administrative issues related to your use of our services. We may post a notice on our website if a security breach occurs. In these circumstances, we may also send an email to you at the email address you have provided.

Data transmissions over the Internet are not 100% secure. Consequently, we cannot guarantee or warrant the security of any information you transmit to us and you do so at your own risk. Once we receive your transmission, we use reasonable efforts to ensure security on our systems.

5. Right to Be Informed

We strive to ensure that all those engaging with us are informed of our arrangements for processing personal data through this Privacy Statement which is linked to from our email signatures and website home page.

6. Right of Access

We will respond to data requests within 1 month and will only charge for requests that are manifestly unfounded or excessive. If we have grounds to refuse a request we will inform the data subject and make them aware of their right to complain to the ICO or to seek civil action – again within 1 month of receiving the request.

7. Right to Rectification

For personal data obtained directly from a data subject under the legal basis of consent – and obtained indirectly from a data subject under the legal basis of legitimate interest – we will correct any inaccuracies in a data subject's personal data upon receipt of a request. For personal data held under the legal basis of "Contract" or "Vital Interests" or "Legal Obligations" we will endeavour to correct the data upon request but may not be able to do so if changing the data may conflict with our legal obligations or be disadvantageous in a future legal action. In cases where we cannot rectify the data for these reasons we shall inform the data subject and make them aware of their right to complain to the ICO or to seek civil action.

8. Right to Erase

For personal data obtained directly from a data subject under the legal basis of consent – and obtained indirectly from a data subject under the legal basis of legitimate interest – we will erase a data subject's personal data upon receipt of a request / opt-out notification. For personal data held under the legal basis of "Contract" or "Vital Interests" or "Legal Obligations" we will endeavour to erase data upon request but will not be able to do so if holding the data is necessary to fulfil our legal obligations or may be necessary as evidence in a future legal action involving us. In cases where we cannot erase the data for these reasons we shall inform the data subject and make them aware of their right to complain to the ICO or to seek civil action.

9. Right to Restrict Processing

For personal data obtained directly from a data subject under the legal basis of consent – and obtained indirectly from a data subject under the legal basis of legitimate interest – we will restrict the processing of a data subject’s personal data upon receipt of a request / opt-out notification. For personal data held under the legal basis of “Contract” or “Vital Interests” or “Legal Obligations” we will endeavour to facilitate the requested restriction upon request, but will not be able to do so if restricting the processing of the data prevents us from fulfilling our legal obligations, or the current processing of the data may be necessary as evidence in a future legal action involving us. In cases where we cannot restrict the processing of the data for these reasons we shall inform the data subject and make them aware of their right to complain to the ICO or to seek civil action.

10. Right to Data Portability

For personal data obtained directly from a data subject under the legal basis of consent – we shall provide, upon receiving a request, the data that we hold in a standard, widely accessible format.

11. Right to Object

For personal data obtained directly from a data subject under the legal basis of consent – and obtained indirectly from a data subject under the legal basis of legitimate interest – we will cease to process a data subject’s personal data upon receipt of a request / opt-out notification.

12. Changes to this Privacy Statement

Aspect reserves the right to revise, modify, or update this statement at any time. We will notify you via email about material changes in the way we treat personal data or by placing a prominent notice on this website.

7. Contacting Aspect

If you have a privacy concern regarding Aspect, or this statement, you may contact us via team@aspect-communications.com.