

NH PUBLISHING LTD PRIVACY POLICY

Network Health Digest (NHD) is owned by NH Publishing Limited ('us', 'we', 'our') registered in England and Wales under company number 05432911. We are the data controller of your information for the purposes of the EU General Data Protection Regulation 2018 ('the GDPR').

We respect your privacy and we are committed to protecting your personal information. We comply with the principles of the GDPR and aim to maintain consistently high levels of best practice in our processing of your information.

This Privacy Policy ('Policy') is intended to inform you as to how we collect, use and disclose your personal data. This Policy is intended to assist you in making informed decisions about your information when using our website or the services provided by us. Please take a minute to read and understand the Policy.

By using our website and services you consent to our collection and use of your information as described in this Policy. If we change our Policy and/or procedures, we will post those changes on our website to keep you aware of what information we collect, how we use it and under what circumstances we may disclose it. Your continued use of the website or services after this Policy has been amended shall be deemed to be your continued acceptance of the terms and conditions of this Policy, as amended. We encourage you to bookmark this Web page and review this Policy regularly.

In addition to this Policy, each service offered by us may have additional privacy provisions that are specific to the particular service. These supplemental disclosures are made adjacent to the particular service at the time your information is collected.

1 WHAT INFORMATION DO WE COLLECT?

All your information will be held and used in accordance with the GDPR where applicable. If you want to know what information we collect and hold about you, please write to us at NH Publishing Ltd, Suite 1 Freshfield Hall, The Square, Lewes Road, Forest Row, East Sussex RH18 5ES. When you visit and use our website or request our services you may provide us with or we may collect your information, such as your postal address, email address, telephone number, IP address and occupation. You may provide or we may collect this information in a number of ways.

1.1 Information you voluntarily provide to us

We collect and maintain information that you voluntarily submit to us during your use of our website or services. For example:

- When you register on our website or for a service, you may provide us with certain information including your name, email address and contact numbers.
- If you sign up to receive a newsletter or a magazine, you may provide us with contact information (e.g., email, telephone and/address).
- You may provide us with information in the course of email, telephone call, customer support interactions and surveys.

You can choose not to provide us with certain information, but this may stop you from gaining access to a service or limit the features that you can use on our websites. For more information, please see the 'How We Use Your Information' section of this Policy below.

1.2 Information we collect through your use of our website

As you use our website, information may also be passively collected by us through our use of cookies, pixels, beacons, log files and other technologies. This information allows us to deliver more helpful information, services, tools and advertisements. Please see section '10 Cookies' below for more information.

If you subscribe online, or purchase a product from us, your card information is not held by us, it is collected by our third party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions, as explained below.

1.3 Information we receive from third parties

We may use third party suppliers to provide part of our service to you. In some circumstances these providers may be based in countries outside the European Economic Area whose laws provide for a different standard of protection for your personal information than that provided under UK Law. In such circumstances we will have in place strict contractual arrangements that will require your information is processed securely, at least to a standard equivalent to the GDPR.

Your personal data will not be disclosed to state institutions and authorities except if required by law or other regulation. Before we release data on this basis, we will ensure that the information is being provided to a genuine and properly authorised investigation. If we refuse to release the information, law enforcement agencies may obtain a court order requiring us to provide it.

We may also combine online and/or offline information received from third parties with your information. The third party information is used for a variety of purposes including to verify other information about you (e.g., verify your mailing address to send you requested products or services) and to enhance the content and advertising we provide to you.

2 HOW WE USE YOUR INFORMATION AND WHO HAS ACCESS TO IT

We will use your information in the ways described below and as described at the time that the information is collected.

We will not sell or rent your information to third parties. We will not share your information with third parties for marketing purposes.

Third Party Service Providers working on our behalf: We may pass your information to our third party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to process subscriptions and send you mailings). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

When you are using our shop, your payment is processed by a third party payment processor PayPal, who specialises in the secure online capture and processing of credit/debit card transactions. If you have any questions regarding secure transactions, please contact us.

2.1 To Provide the Services

In general, we use your information as necessary or appropriate for our business purposes including to:

- Process a subscription to *Network Health Digest (NHD)* that you have made with us;

- Register you and provide you access to the website or services requested by you;
- Mail out *NHD* to your chosen address and fulfil your requests for products or services;
- Respond to inquiries or requests that you direct to us;
- Send communications and administrative emails about the website or our services;
- Personalise and better tailor the features, performance and support of the website and our services for your use; analyse, benchmark and conduct research on user data and user interactions with the website and our services;
- To carry out our obligations arising from any contracts entered into by you and us;
- Seek your views or comments on the services we provide;
- Other purposes related to any of the above.

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations. We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us. See our Terms and Conditions:

http://www.nhdmag.com/page_3598692.html

2.2 Marketing

Where you have provided us with the appropriate consents, we may send you marketing materials about other products or services offered by us. In addition, where you have provided us with the appropriate consents, we may also send you marketing materials about other products or services from relevant advertisers. After you have exercised your right to object or reject the use of cookies, you may still see advertisements, on our websites. If you change your computer, change your browser or delete certain cookies, you will need to renew your preferences.

We will not contact you for marketing purposes by email, phone or text message unless you have given your prior consent. We will not contact you for marketing purposes by post if you have indicated that you do not wish to be contacted. You can change your marketing preferences at any time by contacting us by email: info@networkhealthgroup.co.uk or telephone on 01342 825349.

3 FINDING OUT WHAT PERSONAL INFORMATION WE HOLD ON YOU

Under the GDPR, you have the right to request a copy of the information that we hold about you. We will require two pieces of identification to prove your identity. Please make a written application to the Data Protection Officer, NH Publishing Ltd, Suite 1 Freshfield Hall, The Square, Lewes Road, Forest Row, East Sussex RH18 5ES. We will charge £10 for information requests to cover our costs in providing you with details of the information we hold on you.

4 HOW WE DISCLOSE YOUR INFORMATION TO THIRD PARTIES

We may share your information with third parties as specifically approved by you or under the circumstances described below.

4.1 Disclosure for legal reasons

We may disclose your information if we are under a duty to disclose or share your information to comply with any legal obligation or in order to enforce or apply or fulfil our terms and conditions and other agreements or protect the rights, property, or safety of our customers, or others. This includes exchanging information with other companies and organisations for fraud protection and credit risk reduction.

We use a number of third party organisations to help provide a professional service to our customers (i.e. mailing house, customer relationship management systems and website provider). These organisations act as data processors and are strictly controlled in how they may/may not use your information and we remain responsible for the protection of your information.

4.2 Changes to our Company

In the event we go through a business transition such as a merger, acquisition by another company, or sale of all or a portion of our assets, your information may be among the assets transferred. You acknowledge that such transfers may occur and are permitted by this Policy.

5 UPDATING AND CONTROL OF YOUR INFORMATION

There are a number of ways in which you can control the collection, use, and sharing of your information and update your information and preferences.

5.1 Opting-Out on Receipt of Marketing Communications

When you receive marketing communications from us you will have the opportunity to 'opt-out' by following the unsubscribe instructions provided in the marketing e-mail or newsletter.

5.2 Contacting Us

If your information has changed or if you no longer wish to receive marketing communications from us then please contact us to update your information.

If any of the information that we hold about you is incorrect, you can change/update your details on our website. If the incorrect information relates to your magazine subscription, then you can also contact us either by telephone 0845 450 2125 or via email: info@networkhealthgroup.co.uk and we will update your details as soon as practically possible.

Please note that you have the right to request that your information be deleted from our systems. This we will do as soon as is practically possible. This will also mean that your information will be deleted from the lists or databases of third parties who have been provided with information as permitted by this Policy.

6 THIRD PARTY ONLINE LINKS AND SERVICES

Please remember that when you use a link to go from our website to another website, or you request a service from a third party, our Policy no longer applies. Your browsing and interaction on any other website, or your dealings with any other third party service provider, is subject to that website's or third party service provider's own rules and policies. We do not monitor, control, or endorse the information collection or privacy practices of any third parties. We encourage you to become familiar with the privacy practices of every website you visit or third party service provider that you deal with and to contact them if you have any questions about their respective privacy policies and practices. This Policy applies solely to information collected by us through our website or services and does not apply to these third party websites and third party service providers.

7 WHERE WE STORE YOUR INFORMATION

The information that we collect from you is held in two cloud-based CRM systems and is processed by staff within NH Publishing Ltd at our offices in Forest Row. Your contact details are also processed by our mailing house and other third parties in order for *NHD* to be sent to you in the post and for emails to be sent to you from us (for example *NH-eNews*). By submitting information to us, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with this Policy and the GDPR.

8 SECURITY OF YOUR INFORMATION

We follow appropriate security procedures in the storage and disclosure of your information so as to prevent unauthorised access by third parties. We also require those parties to whom we transfer personal information to comply with the same. However, unfortunately, the transmission of information via the Internet is not completely secure. So, we cannot ensure the security of your

Information transmitted by you to us via the internet. Any such transmission is at your own risk and you acknowledge and agree that we shall not be responsible for any unauthorised use, distribution, damage or destruction of your information, except to the extent we are required to accept such responsibility by the GDPR. Once we have received your information we will use security procedures and features to prevent unauthorised access to it. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Any sensitive information (such as credit or debit card details) is encrypted and protected with the following software 128 Bit encryption on SSL. When you are on a secure page, a lock icon will appear on the bottom of web browsers such as Microsoft Internet Explorer.

9 SOCIAL MEDIA

We do not control how your personal information is collected, stored or used by such third party sites or to whom it is disclosed. You should review the privacy policies and settings on any social networking site that you subscribe to so that you understand the information they may be sharing. If you do not want your networking sites to share information about you, you must contact that site and determine whether it gives you the opportunity to opt-out of sharing such information. We are not responsible for how these third party sites may use information collected from or about you.

10 COOKIES

When you visit our website www.NHDmag.com, we use cookies, which are small pieces of information that allow us to maintain your connection to our website. Our website may use cookies for detecting what kind of device you have in order to present content in the best way, for a language switch and/or for other purposes. These cookies do not collect or store any personally identifiable information. You can refuse the use of cookies by selecting the appropriate settings in your browser. However, if you do this you may lose some useful functionality such as personalisation and 'keep me signed in' and 'remember me' features.

10.1 What are cookies?

Cookies are small text files containing a string of characters that can be placed on your computer or mobile device that uniquely identify your browser or device.

10.2 What are cookies used for?

Cookies allow a site or services to know if your computer or device has visited that site or service before. Cookies can then be used to help understand how the site or service is being used, help you navigate between pages efficiently, help remember your preferences, and generally improve your browsing experience. Cookies can also help ensure marketing you see online is more relevant to you and your interests.

10.3 What types of cookies are there?

There are generally four categories of cookies: 'Strictly Necessary,' 'Performance,' 'Functionality,' and 'Targeting.' routinely uses all four categories of cookies on the Service. You can find out more about each cookie category below:

Strictly Necessary Cookies. These cookies are essential, as they enable you to move around our website and use its features, such as accessing logged in or secure areas.

Performance Cookies. These cookies collect information about how you have used our website, for example, information related to the unique username you may have provided, so that less strain is placed on our backend infrastructure. These cookies may also be used to allow us to know that you have logged in so that we can serve you fresher content than a user who has never logged in. We also use cookies to track aggregate website usage and experiment with new features and changes on our website. The information collected is used to improve how our website works.

Functionality Cookies. These cookies allow us to remember how you're logged in, , , when you logged in or out, the state or history of our website resources that you've used. These cookies also allow us to tailor our website to provide enhanced features and content for users. The information these cookies collect may be anonymous, and they are not used to track your browsing activity on other sites or services.

Targeting Cookies. Our advertising partners or other third party partners may use these types of cookies to deliver advertising that is relevant to your interests. These cookies can remember that your device has visited a site or service, and may also be able to track your device's browsing activity on other sites or services other than our website. This information may be shared with organisations outside our website, such as advertisers and/or advertising networks to deliver the advertising, and to help measure the effectiveness of an advertising campaign, or other business partners for the purpose of providing aggregate Service usage statistics and aggregate Service testing.

10.4 How long will cookies stay on my device?

The length of time a cookie will stay on your computer or mobile device depends on whether it is a 'persistent' or 'session' cookie. Session cookies will only stay on your device until you stop browsing. Persistent cookies stay on your computer or mobile device until they expire or are deleted.

10.5 First and third party cookies

First-party cookies are cookies that belong to our website, third-party cookies are cookies that another party places on your device through our Service. Third-party cookies may be placed on your device by someone providing a service for our website, for example to help us understand how our service is being used. Third-party cookies may also be placed on your device by our business partners so that they can use them to advertise products and services to you elsewhere on the Internet.

10.6 How to control and delete cookies

If you want to delete/disable cookies follow the instructions at www.allaboutcookies.org/manage-cookies/

Please note that if you set your browser to disable cookies, you may not be able to access certain parts of our Service and other parts of our Service may not work properly. You can find out more information cookie settings at third-party information sites, such as www.allaboutcookies.org.

11 GOOGLE ANALYTICS

Our website uses Google Analytics, a web analytics service provided by Google, Inc. ('Google'). Google Analytics uses cookies (text files placed on your computer) to help the website operators analyse how users use the site. The information generated by the cookies about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website,

compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

12 16 OR UNDER

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

13 REVIEW OF THIS POLICY

We keep this Policy under regular review. This Policy was last updated on 18th April 2018.