# Privacy & Fair Processing Notice

This page aims to help you understand what information we might collect about you and how we use it.

Fulcio Marketing Limited is the data controller of your personal data – we may also appear under the parent company name of Rodgerson Black LTD.

Fulcio Marketing are fully committed to protecting and respecting your privacy and will comply with the applicable data protection laws in all our dealings with your personal data.

We may collect and process the following data about you:

- Information about you, such as your name, your business telephone number and email address, that is in the public domain, for example on a website or public register;
- Information that is provided by filling in forms on our sites and via our telephone interviews.
  This includes information provided at the time of registering to use our site, subscribing to our service, posting material, requesting a free listing or requesting further services;
- If you contact us, we may keep a record of that correspondence;
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them;
- Details of transactions you carry out through our site and of the fulfilment of your orders; and
- Details of your visits to our site and emails received including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise.

## IP Addresses

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our partners, sponsors or advertisers. This is statistical data in aggregated form about our users' browsing actions and patterns, and will not allow our partners, sponsors or advertisers to identify you from such data.

## Use of Cookies

Cookies are small, unique strings of code stored on your computer to improve your use of our sites and also to help us to improve functionality and security of the sites. Both session and persistent cookies can be used; session cookies expire when you close the browser and persistent cookies remain on your computer until you remove them. Cookies may also be used to automatically collect information from your computer when you visit our sites, and automatically store it in the log files. This may include information on type of browser software, website activity and your IP address.

Cookies enable us to:

- Estimate our audience size and usage pattern
- Allow us to customise our site according to your individual interests
- Speed up your searches
- Allow you to more easily find previously viewed content when you return

For more details please see our Cookie Policy.

You can refuse to accept all or some cookies by modifying settings within your browser. However, if you do choose to block cookies during your session you may be unable to access certain parts of our sites.

## Where We Store Your Personal Data

Fulcio Marketing store all information about you on 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.

The data that we collect from you may be transferred to, and stored at, a destination outside the United Kingdom and the European Economic Area ("EEA"). It may also be processed by staff operating outside the UK or the EEA who work for us or for one of our suppliers. We will take all steps reasonably necessary to ensure that any personal data transferred outside the UK or the EEA is treated securely and in accordance with the applicable data protection laws.

The transmission of information via the internet unfortunately, is not completely secure. Although Fulcio Marketing will always 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. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## Legal Basis to Process Your Personal Data

Under the applicable data protection laws we need a lawful basis to collect and use your personal data. The law allows for six lawful bases to process people's personal data, and one of them allows personal data to be legally collected and used if it is necessary for a legitimate interest of the organisation – as long as it is fair and balanced and does not unduly impact the rights of individuals.

Due to the nature of our business and the size of our databases, it is not practical for us to ask every individual for his/her consent. We have assessed our and our clients' business interests in carrying out marketing activities and we have carefully considered the impact the collection and use of personal data could potentially have on individuals' rights. Our databases contain business data, which is used to promote business in the UK and such activities are unlikely to affect the fundamental rights and freedoms of individuals concerned. We have therefore concluded that the most appropriate lawful ground for the processing of your personal is our and our client's legitimate interests.

In the event you request any goods and/or services from us, we will rely on our contractual relationship to process your personal data to provide such goods and/or services to you.

Very occasionally, circumstances may arise where we may also rely on a specific consent provided by you for the processing of your personal data. In those circumstances you can withdraw your consent at any time by contacting us – see our contact details below.

### Uses Made of the Information

Fulcio Marketing may use information held about you in the following ways, to:

- Promote your business so that it can be found when searched via, for example, mapping, across major search engines and online directories;
- Promote our client's goods and services which include direct marketing;
- Provide our clients with databases to enable our clients to promote their goods and services;
- Ensure that content from our site is presented in the most effective manner for you and for your computer;
- Trace individuals, verification and/or validation of the identity of individuals for the purposes, but not limited to, anti-money laundering regulations, national security, crime prevention and detection, anti-fraud processes, asset recovery and asset reunification;
- Provide you with information, products or services that you request from us or which we feel may interest you;
- Carry out our obligations arising from any contracts entered into between you and us;
- Allow you to participate in interactive features of our service, when you choose to do so; and
- To notify you about changes to our service.

When contacting you for the above purposes we may do so by phone, post, email or other electronic means, unless you tell us otherwise.

We may share information, including personal data, with the following categories of third parties (which will allow your business to be found via online search engines or online directories, and also by prospective customers):

Suppliers of business to business goods and services, such as:

- Employment and recruitment agencies
- Research organisations
- Credit reference agencies
- Marketing list providers
- Advertisers
- Debt collection agencies
- Business identification and assessment

#### **Data Retention**

We collect and store personal data for the purpose of our business database. As such, we'll only retain your personal data for as long as we believe it is up-to-date, i.e. as long as it is associated with a business that is included in our database. We verify our data periodically and if we learn that you are no longer involved with a business that is in our database, we will remove your data from our records.

## Your Rights

You have the right to:

- Request to see the personal data we hold about you. This includes the right to obtain a confirmation as to whether or not we process any of your personal data;
- Request that we correct any inaccuracies in the personal data that we hold on you;
- From May 2018, in certain circumstances you may have the right to be forgotten (i.e. to have your personally identifiable data deleted). In many cases we would recommend that we supress you from future communications, rather than data deletion;
- In certain situations you have the right to ask for processing of your personal data to be restricted because there is some disagreement about its accuracy or legitimate usage;
- Request that we do not process your personal data for direct marketing and that we will keep your contact details to ensure that no further contact is made;
- Object to our processing of your personal data if we are relying on legitimate interest as the lawful ground for processing; and
- Request the transfer of any personal data you have provided to us to a different organisation.

If you wish to talk to us about any of the above please drop us an email at info@fulcio.co.uk. We may also ask you for proof of your identity and address (eg. a copy of your driving licence or passport, and a recent utility or credit card bill). This is so that we can check that any information we disclose is only provided to the authorised party.

If you have any concerns or complaints about our privacy activities, you can contact us on info@fulcio.co.uk You can also contact the Information Commissioner's Office (ICO) on 0303 123 1113 (www.ico.org.uk).

# Changes To Our Privacy Policy:

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.