

## PRIVACY POLICY

This privacy policy (“Policy”) is for [www.frontera-group.com](http://www.frontera-group.com) (our “website”) and served by FRONTERA GROUP, ST. JOHN’S HOUSE, 54 ST. JOHN’S SQUARE, LONDON, EC1V 4JL (“we” “us” “our”), and governs the privacy of the website’s users (“you”) (regardless of where you visit it from).

This Policy explains how we comply with the General Data Protection Regulation (“GDPR”) and all applicable laws derived from or associated with, GDPR, including the Data Protection Act 2018; and the Privacy and Electronic Communications Regulations (“PECR”).

If you have any questions about this Policy or about any personal data we may hold about you, please contact us via [hello@frontera-group.com](mailto:hello@frontera-group.com) or write to us at Frontera Group, St. John’s House, 54 St. John’s Square, London, EC1V 4JL, United Kingdom.

This Policy covers your personal data on the website, only. There are various links on [www.frontera-group.com](http://www.frontera-group.com) to external sites beyond our control and we suggest you always check the privacy policies of these sites before using them.

### YOUR PERSONAL DATA AND HOW WE COLLECT IT

Personal data relates to a living individual who can be identified from that data. Whilst using our website or any services we offer, you may be required to provide some personal data (such as your name, email address, contact number for example).

Collecting and processing specific, relevant information is a necessary part of us being able to offer you our services and/or products to help with your business development or dealing with any enquiries or requests you may have.

We will only use your personal data fairly and securely and will never do anything with it (such as sharing with any other party) that you have either not clearly agreed to, or that could be considered irresponsible, or without a clear legitimate interest behind it. The lawful basis we use for processing of personal data collected by us via the website is referred to by GDPR as “Legitimate Interest” for “direct marketing”. The Information Commissioner’s Office (“ICO”) recommends that businesses using this basis conduct a “Legitimate Interests Assessment” (“LIA”), and we have done this. For example, if we see that somebody from a Marketing Services Agency has downloaded content from our website, we may try and contact you as it would be reasonable to assume you may have an interest in our services.

Although our processing is based on Legitimate Interest, you retain the right not to consent to this processing. In order to exercise this right, you can contact us

# **FRONTERA**

## **G R O U P**

via [hello@frontera-group.com](mailto:hello@frontera-group.com). You can also contact us via the following address: Frontera Group, St. John's House, 54 St. John's Square, London, EC1V 4JL, United Kingdom. To help us to ensure that your request is dealt with appropriately please could you title your email or other communication "DATA SUBJECT – WITHDRAWAL OF CONSENT".

We will only use your personal data for the purposes we state at the point you provide it to us – for example, when you enquire through our website or over the phone to find out about our services and how Frontera Group may be able to help you.

Frontera Group will ensure that any personal data we collect from you will only be used in a way that is relevant, fair, honest, sensitive, responsible and respectful towards your privacy.

We will only share your personal information with our employees, contractors, agents or professional advisors where it is necessary in order to fulfil a valid stated purpose as above.

We collect information from visitors to this website through the use of our online download forms and the email hyperlinks via our Contact information page.

We collect your details when you email us with an enquiry.

We will send you information according to the preferences you submitted via our online enquiry form.

In addition to the above, we collect information automatically about your visit to our website. Please see our Cookies Section for more details.

We do not collect, and our website has no facility for collecting, any "Special Categories" of "Personal Data" about you (this includes details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and/or offences.

### **DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business-related need-to-know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

#### **QUERIES ABOUT YOUR PERSONAL INFORMATION AND SUBJECT ACCESS REQUESTS**

If you have any requests concerning your personal data or any queries with regard to the practices explained in this Policy, please contact us at [hello@frontera-group.com](mailto:hello@frontera-group.com). To help us to ensure that your request is dealt with appropriately please could you title your email or other communication “DATA SUBJECT – GENERAL ENQUIRY”.

If you would like to change any of your preferences made on the website, at any point, please email us at [hello@frontera-group.com](mailto:hello@frontera-group.com). To help us to ensure that your request is dealt with appropriately please could you title your email or other communication “DATA SUBJECT – CHANGE OF PREFERENCES”.

You have the right to see what personal data we hold about you. To obtain a copy of the personal information we hold about you, please email us via [hello@frontera-group.com](mailto:hello@frontera-group.com). To help us to ensure that your request is dealt with appropriately please could you title your email or other communication “DATA SUBJECT – REQUEST FOR PERSONAL DATA”.

You have the right to withdraw consent at any time to any of your personal data we may have acquired being processed by us. To do this, please contact us at [hello@frontera-group.com](mailto:hello@frontera-group.com). To help us to ensure that your request is dealt with appropriately please could you title your email or other communication “DATA SUBJECT – WITHDRAWAL OF CONSENT”.

Alternatively, you can also write to us via the following address: Frontera Group, St. John’s House, 54 St. John’s Square, London, EC1V 4JL, United Kingdom.

If you feel any query you have has not been resolved, you have the right to make a complaint to the ICO. For details please see [www.ico.org.uk](http://www.ico.org.uk).

#### **MARKETING**

The information we hold about you may be used to send you details of the services that we offer that we think will most likely be of interest to you. This will be in accordance with the preferences that you indicated when you completed our online enquiry form or that you may have requested verbally or by other means, or where we rely on a clear legitimate interest.

If at any point you would like to opt-out of receiving communications from us or would like to change the means or methods of communication (such as email or post) that we use to contact you, please contact us at [hello@frontera-group.com](mailto:hello@frontera-group.com). You can also write to

us at the following address: Frontera Group, St. John's House, 54 St. John's Square, London, EC1V 4JL, United Kingdom. Any email we send you offering our services will always have an "opt-out" button and selecting this will prevent you receiving any further marketing emails from Frontera Group to that specific email address.

#### **DISCLOSURES**

We will not share your personal data with third parties unless we are obliged to disclose personal data by law, or the disclosure is necessary for purposes of national security, taxation and/or criminal investigation, or we have your consent. Any disclosure will be in compliance with GDPR.

#### **INTERNET-BASED TRANSFERS**

The Internet is a global environment, so using it to collect and process personal data may involve the transmission of data on an international basis. This means for instance that data you pass to us may be processed outside the European Economic Area, although the data will always be held securely and in line with the requirements of GDPR.

#### **COOKIES**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and allows us to improve the website. By continuing to browse the website, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily. The analytical cookies used on our site are non-intrusive and collect only anonymous information.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie	What data is collected by the cookie?	Who owns this data?	Is this a 1st party of a 3rd party cookie?
Google Analytics	<i>Anonymised visitor data and traffic sources for website performance purposes</i>	Google	1st party

Please note that third parties (including, for example, providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

#### Amendments

This privacy policy is subject to change from time to time. It was last reviewed in May 2020. If we make any significant changes to this policy, we will notify you at the point that you visit our website.