

# Privacy Policy

Welcome to the Montana Fogg privacy policy. We respect your privacy and are committed to protecting your personal data.

## 1. Introduction

This privacy policy tells you how Montana Fogg use your personal data when you visit our website and interact with us.

It also tells you about your privacy rights and how the law protects you.

It is important that you read this privacy policy, together with any other privacy policies we may provide, so that you are fully aware of how and why we are using your data.

This privacy policy was created on 20<sup>th</sup> of May 2018.

If you have any questions, or would like to exercise your privacy rights, please follow the instructions in this privacy policy. See How to contact Montana Fogg about privacy below.

## 2. Our website

Our website at montanafogg.com offers information on what services we offer and is aimed at business users – from start-ups and independent companies to larger organisations. This website is not intended for children and we do not knowingly collect data relating to children.

Montana Fogg is made up of one legal entity:

- SCF Consultants Limited, located at Suite 26, 15 Ingestre Place, London W1F 0DU, United Kingdom.

SCF Consultants Limited is the data controller responsible for this website and any handling of personal data carried out by or on behalf of Montana Fogg or SCF Consultants Limited.

### **3. Personal data which we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We collect the minimum amount of information about our subscribers to the Montana Fogg website. This personal data falls into these categories:

Identity Data includes title, first name, last name, username or similar identifier. If you interact with us through social media, this may include your social media user name.

Contact Data includes email address only.

We do not collect Financial Data, Transaction Data, Profile Data, Technical Data, Usage Data or Tracking Data.

We do collect Marketing and Communications Data that include your preferences in receiving direct marketing from us and your communication preferences.

We collect, use and share Aggregated Data such as statistical or demographic data for the purpose of improving our website's performance. We use Google Analytics for this purpose. To see their privacy policy, go to <https://policies.google.com/privacy>

We do not collect any Special Categories of Personal Data about you (this includes details about your 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 offences.

We understand that if you choose not to share personal data with us, or refuse certain contact permissions, we might not be able to provide the products and services you've asked for.

### **4. How is your personal data collected?**

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity and Contact by filling in forms or by corresponding with us by post, phone, email or through chat or social media.

This includes personal data you provide when you:

- sign up to receive the Montana Fogg Blog newsletters;
- make enquiries or request information be sent to you;
- order our products or services;
- ask for marketing to be sent to you;
- engage with us on social media;
- enter a competition, promotion or survey;

Third parties or publicly available sources. We may receive personal data about you from various types of third parties, including:

- Identity and Contact Data from data partners; and
- Data from any third parties who are permitted by law or have your permission to share your personal data with us, such as via social media or review sites We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances;
- To send you Montana Fogg Blog newsletters;
- To engage with you on social media;

## **5. How we use your personal data**

Where we need to perform the contract, we are about to enter into or have entered into with you. For example, when you purchase our services, that's a contract.

- Where we need to comply with a legal or regulatory obligation. For example, keeping records of our sales for tax compliance.

Generally, we do on consent as a legal basis for processing your personal data other than where the law requires it, for example in relation to sending certain direct marketing communications. Where our legal basis is consent, you have the right to withdraw consent any time.

See Explaining the legal bases we rely on to process personal data to find out more about the types of lawful basis that we will rely on to process your personal data.

## 6. Explaining the legal bases we rely on to process personal data

The table below shows you a description of all the ways we plan to use personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

We do not carry out any automated decision making.

If you ever have any questions about this, please ask. See How to contact Montana Fogg about privacy below.

Purpose/Activity	Type of Data	Lawful Basis for Processing
To register you as a new subscriber	Identity Contact	Performance of a contract with you
To manage our relationship with you by notifying you about changes to our privacy policy	Identity Contact Profile Marketing and Communications	Performance of a contract with you Necessary to comply with legal obligations Necessary for our legitimate interests (to keep our records updated)
To deliver our blog to you	Identity Contact Profile Marketing and Communications	For all blog marketing communications we rely on consent.

To prevent and detect unlawful acts	Identity Contact	Necessary to comply with a legal or contractual obligation to share personal data for the purposes of law enforcement
In order to resolve legal claims or disputes involving you or us	All relevant data categories depending on the nature of the allegation or claim	Necessary to bring or defend a claim

## 7. Advertising, marketing and your communications preferences

We may carry out direct marketing by email, for example, you might have the latest Montana Fogg newsletter land in your inbox

On our website, we always try hard to make it really clear what we are doing and what communications you will be sent, namely if you decide to sign up to the newsletter - and you have a right at any time to change your mind and say no thank you and opt out. The easiest way to opt out is to use the unsubscribe link at the bottom of the communication.

We do not advertise and do not use personal data to this end.

The only thing we may do that may be specifically directed at you will come through emails, for example the newsletter.

## 8. Cookies

You can see from Advertising, marketing and your communications preferences above, that cookies are a tool which we (and everyone one else who operates online) uses for advertising. That is just part of why cookies are used.

Cookies help Montanafogg.com work better and provide lots of help in the background to make the process of being a subscriber coma lot easier.

Other cookies collect information about how visitors use Montanafogg.com, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect

information that identifies a visitor. All information these cookies collect is aggregated and used to improve how Montanafogg.com works.

There are also cookies that allow Montanafogg.com to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as watching a video or commenting on a blog.

There are cookies that collect information about your browsing habits in order to make advertising delivered to you more relevant to you and your interests (see Advertising, marketing and your communications preferences above). They are usually placed by advertising networks with our permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.

When you use Montanafogg.com, your device or browser may be sent cookies from third parties, for example when using embedded content and social network links. It's important for you to know that we have no access to or control over cookies used by these companies or third-party websites. We suggest you check the third-party websites for more information about their cookies and how to manage them.

You can see more information about the cookies we use at the end of this policy, including who they belong to, their ID and why they are used. We've also included links to the third-party websites where you can go to find out more.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

## **9. Disclosures of your personal data**

We may share your personal data with the parties set out below for the purposes set out in this privacy policy. We may also share your personal data if the law otherwise allows it.

We may share personal data with the following categories third parties:

- Any future SCF Consultant entities;

professional advisers like lawyers; and

- government, regulators and law enforcement.

## **10. International transfers**

Whenever we transfer your personal data out of the EEA, we will comply with applicable data protection law. Some of the mechanisms we may choose to use when undertaking an international transfer are:

- The transfer of your personal data is to a country that has officially been deemed to provide an adequate level of protection for personal data by the European Commission.
- We may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe (called the "EU Model Clauses").
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. If the provider is not EU-US Privacy Shield certified, we may use the EU Model Clauses.

We share your personal data within SCF Consultants, which could involve transferring your data outside the European Economic Area. We do this using the EU Model Clauses.

## **11. 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 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.

## **12. Third-party links**

This website may include links to third-party websites, plug-ins and applications (for example, the ability to sign in with Facebook). Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## **13. Data retention**

We will only keep your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our client (including Contact and Identity, Financial and Transaction Data) for six years after they stop being clients for tax purposes.

In some circumstances you can ask us to delete your data; see Your legal rights below for further information.

## **14. Your legal rights**

If the General Data Protection Regulation applies to you because you are in the European Union, you have rights under data protection laws in relation to your personal data:

- The right to be informed – that’s an obligation on us to inform you how we use your personal data (and that’s what we’re doing that in this privacy policy);
- The right of access – that’s a right to make what’s known as a ‘data subject access request’ for copy of the personal data we hold about you;



- The right to rectification – that’s a right to make us correct personal data about you that may be incomplete or inaccurate;
- The right to erasure – that’s also known as the ‘right to be forgotten’ where in certain circumstances you can ask us to delete the personal data we have about you (unless there’s an overriding legal reason we need to keep it);
- The right to restrict processing – that’s a right for you in certain circumstances to ask us to suspend processing personal data;
- The right to data portability – that’s a right for you to ask us for a copy of your personal data in a common format (for example, a .csv file);
- The right to object – that’s a right for you to object to us processing your personal data (for example, if you object to us processing your data for direct marketing); and
- Rights in relation to automated decision making and profiling – that’s a right you have for us to be transparent about any profiling we do, or any automated decision making.

These rights are subject to certain rules around when you can exercise them. You can see a lot more information on them, if you are interested, on the UK Information Commissioner’s Office <https://ico.org>.

If you wish to exercise any of the rights set out above, please contact us (see How to contact Montana Fogg about privacy).

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We 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.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details in How to contact Montana Fogg about privacy below.

You have the right to make a complaint at any time to the Information Commissioner's Office ("ICO"), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### **15. How to contact MOO about privacy**

If you have any questions about this privacy policy, or would like to exercise any of your rights, please email us at [seb@moontanafogg.com](mailto:seb@moontanafogg.com) or write to us with your letter addressed to: Data Privacy Manager, SCF Consultants Ltd, Suite 26, 15 Ingestre Place, London W1F 0DU, United Kingdom.

### **16. Changes to this privacy policy**

The General Data Protection Regulation is new and the ICO is still issuing new bits of guidance about how businesses should follow it. So, you may see little updates to our privacy policy over the coming months. Be sure to check in and have read every now and then. Thank you.

## **Cookie Information**

This is Montana Fogg's cookie information page. We respect your privacy and are committed to protecting your personal data. Please read the full privacy policy for more information.

### **1. How this cookie list works**

This cookie list tells you how SCF Consultants use cookies on the [www.montanafogg.com](http://www.montanafogg.com) website.

We are always trying to make things better at Montana Fogg, and that includes how we might use [montanafogg.com](http://montanafogg.com). whenever you look at it, it is just a snapshot in time, for the time that you look at it.

## 2. The sorts of things our cookies do

Cookies help montanafogg.com work better and provide help in the background to make the process of being a subscriber easier. Other cookies collect information about how visitors use montanafogg.com, for instance which pages visitors go to most often. These cookies do not collect information that identifies a visitor. All information these cookies collect is aggregated by us to improve how montanafogg.com works.

When you use montanafogg.com, your device or browser may be sent cookies from third parties, for example when using an embedded content and social network links. It is important for you to know that we have no access to or control over cookies used by these companies or third-party websites. We suggest you check the third-party websites for more information about their cookies and how to manage them.

## 3. The cookies list

Below you can see more information about the cookies we use, including who they belong to, their ID and why they are used. We have also included links to the third-party websites where you can go to find out more.

Vendor	Cookie ID	Purpose	More information
Google Analytics	Placed through montanafogg.com cookie: _ga, visitor_id, _gat_UA-119593503-1	Google analytics is a web analytics service provided by Google, Inc. Google Analytics sets a cookie in order to evaluate use of those service and compile a report for us.	<a href="https://support.google.com/analytics/answers/6004245?hl=en">https://support.google.com/analytics/answers/6004245?hl=en</a>
Wix	svSession	Creates activities and BI	<a href="https://support.wix.com/en/article/site-compliance-with-the-european-union-cookie-law">https://support.wix.com/en/article/site-compliance-with-the-european-union-cookie-law</a>
Wix	hs	Security	See above

Wix	Incap_ses_\${Proxy-ID}_\${Site-ID}	Security	See above
Wix	Incap_visid_\${Proxy-ID}_\${Site-ID}	Security	See above
Wix	nlbi_{ID}	Security	See above
Wix	XSRF-TOKEN	Security	See above
Wix	smSession	Identify logged in members	See above

#### 4. How you can control cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. For further information about how to refuse cookies, please see your browser's help section or go to [www.allaboutcookies.org](http://www.allaboutcookies.org).

If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.