



Privacy Policy

BACKGROUND:

Pacific Marketing Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, www.pacificmarketinghub.com ("Our Site") and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is deemed to occur upon your first use of Our Site and you will be required to read and accept this Privacy Policy when signing up for an Account. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

"Account"	means an account required to access and/or use certain areas and features of Our Site;
"Cookie"	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in Part 14, below; and
"Cookie Law"	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;

2. Information About Us

Our Site is owned and operated by Pacific Marketing Ltd, a limited company registered in England under company number 03102484.

Registered address: Jordans Courtyard, 8 Upper High Street, Thame, Oxfordshire, United Kingdom, OX9 3ER

Main trading address: Jordans Courtyard, 8 Upper High Street, Thame, Oxfordshire, United Kingdom, OX9 3ER

VAT Number: GB 663 2914 29

UK Data Protection Registration Number: Z6152456

Data Protection Officer: Justin Shardlow

Email address: jshardlow@pacificmarketing.co.uk

Telephone number: +44(0)1844 212555

Postal Address: Jordans Courtyard, 8 Upper High Street, Thame, Oxfordshire, OX9 3ER

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

4. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 15.
- b) The right to access the personal data we hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 15 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 15.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

6. What Data Do We Collect?

Depending upon your use of Our Site, we may collect some or all of the following personal and non-personal data (please also see Part 14 on our use of Cookies and similar technologies):

- Name;
- Date of birth;
- Gender;
- Address;
- Geographic location
- Email address;
- Telephone number;
- Business name;
- Job title;

- Profession;
- Payment information;
- Information about your preferences and interests;
- IP address;
- Web browser type and version;
- Operating system;
- Device type and MAC address;
- A list of URLs starting with a referring site, your activity on Our Site, and the site you exit to;

7. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for the following purposes:

- Providing and managing your Account;
Providing and managing your access to Our Site where appropriate;
- Personalising and tailoring your experience on Our Site;
- Supplying our products and services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our products and services for you.
- Communicating with you. This may include responding to emails or calls from you or providing information about our products and services to you.
- Supplying you with information by email or post that you have opted-in to (you may unsubscribe or opt-out at any time by clicking the 'Unsubscribe' links in emails or by contacting us via email, telephone or post.
- Analysing your use of Our Site and gathering feedback to enable us to continually improve Our Site and your user experience.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone, text message or post with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

Third Parties (including SharpSpring, HubSpot, Google, SagePay and others) whose content appears on Our Site may use third-party Cookies, as detailed below in Part 14. Please refer to Part 14 for more information on controlling cookies. Please note that we do not control the activities of such third parties, nor the data that they collect and use themselves, and we advise you to check the privacy policies of any such third parties.

We use the following automated systems for carrying out certain kinds of decision-making profiling. If at any point you wish to query any action that we take on the basis of this or wish to request 'human intervention' (i.e. have someone review the action themselves, rather than relying only on the automated method), the GDPR gives you the right to do so. Please contact us to find out more using the details in Part 15.

- The following automated decision-making method(s) may be used:
 - Through the use of software platforms SharpSpring.com or HubSpot.com we may choose to use automated workflows and processes to send communications to you via email or text based on profiling your use and interaction with Our Site, your status as a customer (or not) and your interactions (or not) with previous communications we have sent you. You will only receive automated communications if you have



opted-in to receive marketing, promotional, offer or news communications or you are an existing customer who we need to communicate with for operational purposes (such as product onboarding)

- The following automated profiling may take place:
 - Through the use of software platforms SharpSpring.com and HubSpot.com we will collect, analyse and profile your use of Our Site (pages visited, media downloaded, forms submitted), your interaction with communications we have sent you via email or SMS (open, read, click-thru) and your interaction with our social media posts and account (likes, shares and responses)

8. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected.

9. How and Where Do You Store or Transfer My Personal Data?

We share your data with external third parties, as detailed below in Part 10, that are based outside of the EEA. The following safeguards are applied to such transfers:

We will only transfer your personal data to countries that the European Commission has deemed to provide an adequate level of personal data protection. More information is available from the [European Commission](#).]

Where we transfer your data to a third party based in the US, this may be protected if they are part of the EU-US Privacy Shield. This requires that third party to provide data protection to standards similar to those in Europe. More information is available from the [European Commission](#).

Please contact us using the details below in Part 15 for further information about the particular data protection mechanism used by us when transferring your personal data to a third country.

10. Do You Share My Personal Data?

We may sometimes contract with the following third parties to supply certain products services. These may include payment processing, delivery, and marketing. In some cases, those third parties may require access to some or all of your personal data that we hold.

- SharpSpring.com for the purposes of marketing, analytics profiling and automated marketing communications decision making.
- HubSpot.com for the purposes of marketing, analytics profiling and automated marketing communications decision making.
- Google for the purposes of analytics.
- SagePay for the purposes of payment

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 9.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR, as explained above in Part 9.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

11. How Can I Control My Personal Data?

11.1 In addition to your rights under the GDPR, set out in Part 5, when you submit personal data via



Our Site, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails and, at the point of providing your details and by managing your Account]).

11.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

12. Can I Withhold Information?

You may access certain areas of Our Site without providing any personal data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

You may restrict our use of Cookies. For more information, see Part.

13. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within less than one month and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

14. How Do You Use Cookies?

Our Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve our products and services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

By using Our Site, you may also receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than us. Third-party Cookies are used on Our Site for the purposes of gathering information about your use of Our Site (including which pages you visit, which media you access or download and which forms you complete), profiling for marketing purposes and automated marketing communications decision making. For more details, please refer to the table below. These Cookies are not integral to the functioning of Our Site and your use and experience of Our Site will not be impaired by refusing consent to them.

All Cookies used by and on Our Site are used in accordance with current Cookie Law.

Before Cookies are placed on your computer or device, you will be shown a clear warning message on screen requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. You may, if



you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.

Certain features of Our Site may depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown in the table below. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

The following first-party Cookies may be placed on your computer or device:

Name of Cookie	Purpose	Strictly Necessary
userSessionID	Used to authenticate user when accessing restricted areas of Our Site that require user to log in.	Yes

and the following third-party Cookies may be placed on your computer or device:

Name of Cookie	Provider	Purpose
koitk __ss __ss_tk __ss_referrer	SharpSpring.com / MarketingAutomation.Services	SharpSpring Tracking Cookie and Session Identifier Tokens. These cookies are used to track visitors and form submissions.
__hs_opt_out	HubSpot	This cookie is used by the opt-in privacy policy to remember not to ask the user to accept cookies again. This cookie is set when you give users the choice to opt out of cookies.(Expires: 2 years)
__hs_do_not_track	HubSpot	This cookie can be set to prevent the tracking code from sending any information to HubSpot. Setting this cookie is different from opting out of cookies, which still allows anonymized information to be sent to HubSpot.(Expires: 2 years)
__hs_testcookie	HubSpot	This cookie is used to test whether the visitor has support for cookies enabled. (Expires: Session cookie)
hs_ab_test	HubSpot	This cookie is used to consistently serve visitors the same version of an A/B test page that they've seen before.(Expires: Session cookie)
hs_lang_switcher_choice	HubSpot	This cookie is used to consistently redirect visitors to the language version of a page in the language they've selected on this top-level private domain in the past (if such a language version exists).
<id>_key	HubSpot	When visiting a password-protected page, this cookie is set so future visits to the page from the same browser do not require login. The cookie name is unique for each password-protected page.

hs-messages-is-open (TTL 30 minutes)	HubSpot	This cookie is used on the visitor UI side so HubSpot can determine/save whether the chat widget is open for future visits. It resets after 30 minutes to re-close the widget after 30 minutes of inactivity
hs-messages-hide-welcome-message (TTL 1 day)	HubSpot	When you dismiss the welcome message in your messages tool, a cookie is set to prevent it from appearing again for one day.
__hstc	HubSpot	The main cookie for tracking visitors. It contains the domain, utk (see below), initial timestamp (first visit), last timestamp (last visit), current timestamp (this visit), and session number (increments for each subsequent session). (Expires: 2 years)
hubspotutk	HubSpot	This cookie is used for to keep track of a visitor's identity. This cookie is passed to HubSpot on form submission and used when de-duplicating contacts.(Expires: 10 years)
__hssc	HubSpot	This cookie keeps track of sessions. This is used to determine if we should increment the session number and timestamps in the __hstc cookie. It contains the domain, viewCount (increments each pageView in a session), and session start timestamp. (Expires: 30 min)
__hssrc	HubSpot	Whenever HubSpot changes the session cookie, this cookie is also set. We set it to 1 and use it to determine if the user has restarted their browser. If this cookie does not exist when we manage cookies, we assume it is a new session.(Expires: None. Session cookie)
messagesUtk	HubSpot	This cookie is used to recognize visitors who chat with you via the messages tool. If the visitor leaves your site before they're added as a contact, they will have this cookie associated with their browser. If you have a history of chatting with a visitor and they return to your site later in the same cookie browser, the messages tool will load your conversation history with that visitor.

Our Site uses analytics services provided by Google, SharpSpring and HubSpot. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how Our Site is used. This, in turn, enables us to improve Our Site and the products and services offered through it.

The analytics service(s) used by Our Site use(s) Cookies to gather the required information. You do not have to allow us to use these Cookies, however whilst our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable us to continually improve Our Site, making it a



better and more useful experience for you.

The analytics service(s) used by Our Site use(s) the following Cookies:

Name of Cookie	First / Third Party	Provider	Purpose
koitk __ss __ss_tk __ss_referrer	Third	SharpSpring.com / MarketingAutomation.Services	SharpSpring Tracking Cookie and Session Identifier Tokens. These cookies are used to track visitors and form submissions.
__utma	Third	Google Analytics	A persistent cookie - remains on a computer, unless it expires or the cookie cache is cleared. It tracks visitors. Metrics associated with the Google __utma cookie include: first visit (unique visit), last visit (returning visit). This also includes Days and Visits to purchase calculations which afford ecommerce websites with data intelligence around purchasing sales funnels.
__utmb & __utmc	Third	Google Analytics	These cookies work in tandem to calculate visit length. Google __utmb cookie demarks the exact arrival time, then Google __utmc registers the precise exit time of the user.
__utmz	Third	Google Analytics	Cookie __utmz monitors the HTTP Referrer and notes where a visitor arrived from, with the referrer siloed into type (Search engine (organic or cpc), direct, social and unaccounted). From the HTTP Referrer the __utmz Cookie also registers, what keyword generated the visit plus geolocation data. This cookie lasts six months. In tracking terms this Cookie is perhaps the most important as it will tell you about your traffic and help with conversion information such as what source / medium / keyword to attribute for a Goal Conversion.
__utmv	Third	Google Analytics	Google __utmv Cookie lasts "forever". It is a persistent cookie. It is used for segmentation, data experimentation and the __utmv works hand in hand with the __utmz cookie to improve cookie targeting capabilities.

In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all



Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

15. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Justin Shardlow):

Email address: jshardlow@pacificmarketing.co.uk

Telephone number: +44(0)1844 212555

Postal Address: Jordans Courtyard, 8 Upper High Street, Thame, Oxfordshire, United Kingdom, OX9 3ER

16. Changes to this Privacy Policy

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.