



## Privacy Policy

Pacific Marketing Ltd (“We”/“Us”) 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.pacificmarketing.co.uk](http://www.pacificmarketing.co.uk) (“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, if relevant, you will be required to confirm you have 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 12, below; and

### 2. Information About Us

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

Our registered address and main trading address is 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 Manager: Justin Shardlow

Email address: [justin.shardlow@pacificmarketing.co.uk](mailto:justin.shardlow@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.

This website is not intended for children and we do not knowingly collect data relating to children.

#### 4. What is Personal Data?

Personal data is defined in law as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’. Our collection, use and processing of your personal data is governed principally by the retained law of the General Data Protection Regulation (EU Regulation 2016/679) (the “UK GDPR”) and Data Protection Act 2018

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 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 12 on Our use of Cookies and similar technologies), We have grouped these together as follows:

- Identity Data including Name; Date of birth; Gender; Job title; Profession.
- Contact Data including Address; Email address; Telephone number; Business name.
- Geographic location.
- Financial Data including Payment information; bank account, payment card details
- Profile Data including your user name and password, services purchased by you, feedback and survey responses, Information about your preferences and interests.
- Technical Data including IP address; Web browser type and version; Device type and MAC address.
- Usage Data including a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to.

#### 6. How Do You Use My Personal Data?

Under the UK 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:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest



<p>To enable you to contact us and permit us to respond to such enquiries</p>	<p>(a) Identity (b) Contact</p>	<p>(a) Necessary for our legitimate interests (to liaise with potential and actual customers)</p>
<p>Where relevant, to permit you to create an account and register you as a new customer</p>	<p>(a) Identity (b) Contact (c) Profile (d) Financial</p>	<p>(a) Necessary for our legitimate interests (to facilitate the provision of our services) (b) Performance of a contract with you</p>
<p>Where relevant, to process service requests and deliver those services including:</p> <p>(a) Manage payments, fees and charges</p> <p>(b) Collect and recover money owed to us</p>	<p>(a) Identity (b) Contact (c) Profile (d) Financial</p>	<p>(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or <b>privacy policy</b></p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) Identity (b) Contact (c) Profile</p>	<p>(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To administer and protect our business and Our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation</p>



To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

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 UK 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 and others) whose content appears on Our Site may use third-party Cookies, as detailed below in Part 13. Please refer to Part 13 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 may use limited forms of automated systems for carrying out certain kinds of decision-making and profiling. In particular, in relation to communications and marketing and your interactions with Us and Our Site to profile what communications and/or marketing are appropriate. 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 UK GDPR gives you the right to do so. Please contact us to find out more using the details in Part 13.

#### 7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is reasonably necessary in light of the reason(s) for which it was first collected and taking into account any legal, regulatory, tax, 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, regulatory, tax, accounting or other requirements.

We may retain your personal data for a longer period in the event of a complaint or if We reasonably believe there is a prospect of litigation in respect of Our relationship with you.

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

We may share your data with external third parties, as detailed below in Part 9, that may be based outside of the EEA.

Whenever We transfer your personal data out of the UK, We ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will either transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data; or
- Where We use certain service providers in countries not deemed to provide an adequate level of protection we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us using the details below in Part 13 for further information about the particular data protection mechanism used by us when transferring your personal data to a third country.

#### 9. Do You Share My Personal Data?

We may sometimes contract with third parties to supply certain products services to us. These may include payment processing, data analytics, and marketing. In some cases, those third parties may require access to some or all of your personal data that We hold. You can request information on the identity of any third parties by contacting Us using the details in Part 13.

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 8.

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

#### 10. What are my rights?

Under the UK GDPR, you have the following rights, which we will always work to uphold. Further details can be found at <https://ico.org.uk/your-data-matters/>, but in summary your rights include:

- 1) The right to request access to your personal data.
- 2) The right to request correction of your personal data.
- 3) The right to request erasure of your personal data.



- 4) The right to object to processing of your personal data.
- 5) The right to request restriction of processing your personal data.
- 6) The right to request transfer of your personal data.
- 7) The right to withdraw consent.

In addition to your rights under the UK GDPR, set out above, 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/or by managing your Account).

If you wish to exercise any of the rights above, please contact us using the details provided in Part 13.

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 could 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 could 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.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator 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.

#### 11. 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.

#### 12. How Do You Use Cookies?

Our Site may place and access certain Cookies on your computer or device. We use Cookies to enable certain elements of Our site to function, 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 your 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.

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. These are classeds as “strictly necessary” Cookies. 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)



<p>__hs_do_not_track</p>	<p>HubSpot</p>	<p>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)</p>
<p>__hs_testcookie</p>	<p>HubSpot</p>	<p>This cookie is used to test whether the visitor has support for cookies enabled. (Expires: Session cookie)</p>
<p>hs_ab_test</p>	<p>HubSpot</p>	<p>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)</p>
<p>hs_lang_switcher_choice</p>	<p>HubSpot</p>	<p>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.</p>
<p>hs-messages-is-open (TTL 30 minutes)</p>	<p>HubSpot</p>	<p>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)</p>
<p>Hubspotutk</p>	<p>HubSpot</p>	<p>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)</p>



<p>__hssc</p>	<p>HubSpot</p>	<p>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)</p>
<p>__hssrc</p>	<p>HubSpot</p>	<p>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)</p>
<p>messagesUtk</p>	<p>HubSpot</p>	<p>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 cookied browser, the messages tool will load your conversation history with that visitor.</p>

Our Site uses analytics services provided third-parties, such as 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
Koitrk __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

			<p>registers, what keyword generated the visit plus geolocation data.</p> <p>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.</p>
__utmv	Third	Google Analytics	<p>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.</p>

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.

### 13. 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 contact Our Data Protection Manager using the following details (for the attention of Justin Shardlow):

Email address: [justin.shardlow@pacificmarketing.co.uk](mailto:justin.shardlow@pacificmarketing.co.uk)

Telephone number: +44(0)1844 212555

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



#### 14. Changes to this Privacy Policy

We may change this Privacy Policy 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.