

dunnhumby Sponsored Ads Platform Privacy Notice

1. Introduction

- 1.1. dunnhumby sponsored ads platform (the "**Platform**") is operated by dunnhumby Limited ("**dunnhumby**", "**we**", "**us**" or "**our**").
- 1.2. This Privacy Notice:
 - applies to personal data that we collect through the Platform
 - explains how we collect, use, share and retain personal data (information about you as authorised end users of the Platform from which you can be directly or indirectly identified, "**you**"); and
 - explains how you can exercise your rights in respect of the personal data we hold about you.
- 1.3. This Privacy Notice does not apply to information about consumers who purchase products or services from dunnhumby clients.

2. Quick links

This Privacy Notice is broken down into sections, please click on the links below if you want to navigate to a section:

Page no.	Section
1	Personal data we collect about you
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3. Personal data we collect about you

We collect the following personal data about you:

Source of personal data	Category of personal data	Personal data included in this category
You or Your employer	Identity and Contact	<ul style="list-style-type: none"> • Identity: your first and last name, user ID and password for the Platform • Contact: your work email address • Employer: the name of your employer
You	Communication	<ul style="list-style-type: none"> • your communications with us (including e-mails and other messages between you and us)
Collected Automatically	Technical Information	<ul style="list-style-type: none"> • information shared with us by our third-party platform provider that will be used to provide technical support if, for example, you have raised a question through the chat support function or you require our help when using the Platform,

4. How we use personal data and our legal basis for processing it

We rely on the following legal bases to use your personal data for the following purposes:

Source of personal data	Legal basis	Purposes
You or your employer	Legitimate Interest	<ul style="list-style-type: none"> • register you as a user of the Platform • allow you to connect to and use the Platform • manage your access to the Platform • provide you with help and support in using the Platform • provide user guides and education • respond and deal with your queries or comments • email you with notifications and reminders about your use of the Platform
	Compliance with law	<ul style="list-style-type: none"> • comply with the law • to exercise, establish or defend our legal rights • to protect the rights, property, or safety of dunnhumby or others
Collected automatically	Legitimate Interests	<ul style="list-style-type: none"> • for network and information security purposes to enable us to verify your identity and access rights to the Platform

	Consent	<ul style="list-style-type: none"> • for the purposes listed in the dunnhumby Sponsored Ads Platform Cookie Notice including the collection of information through third party cookies.
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Where we have mentioned above our use of your personal data is based on our “legitimate interests”, these are:

- to service our clients’ needs, including delivering our products and services; and
- to protect and support our business.

If you have any questions or need further information concerning the legal basis on which we collect and use your personal information, please Contact Us individualrights@dunnhumby.com

5. Who we share your personal data with?

5.1 We will only share personal data with the following categories of third parties:

- our **group companies** who help us to provide the Platform to you and they will only use the personal data for the purposes described in this Privacy Notice;
- **third party service providers** who help us to provide the Platform for example by hosting it, enabling certain features or functionality, or by providing other services such as support and maintenance, security technology, or helpdesk support, e.g. CitrusAds provides us with our sponsored search solution;
- **our client (your employer)** who may access and use the reports created in the Platform through their corporate account;
- any **competent law enforcement body, regulator, government agency, court or other third party** to (i) comply with the law; (ii) exercise, establish or defend our legal rights, or (iii) protect the rights, property, or safety of dunnhumby or others; and
- **third parties** in the context of the possible **sale or restructuring of our business** or when you have provided your **consent** and the third parties will only use the personal data for the purposes described in this Privacy Notice.

5.2. If the Californian Consumer Privacy Act (CCPA) applies to the processing of your information, we confirm that we do not sell your personal information.

6. How we protect your personal data

- 6.1. We use appropriate security measures to protect the personal data that we collect and process about you to help ensure it remains secure against accidental or unlawful destruction, loss, alteration or unauthorised access.
- 6.2. We protect the personal data with a combination of technical and physical measures which are designed to provide a level of protection appropriate to the risk of processing the personal data.
- 6.3. Whilst we take appropriate technical and organisational measures to safeguard your personal data, it is important that you keep your [the Platform] login details protected from unauthorised access.

7. Where we store and transfer your personal data

- 7.1. In the context of your use of the Platform, we store your personal data in our third-party service provider's data centres with hosting at a regional level dependant on your location. Where we otherwise share personal data as described in section 5 (**Who we share personal data with**) above, these third parties may process the personal data at locations outside of the country or region in which you are resident. If we do this or undertake any other international transfers of personal data, we will take appropriate measures to ensure your personal data remains protected to the standards described in this Privacy Notice, for example by entering into contractual agreements based on the EU Commission's standard contractual clauses, a copy of which can be found [here](#).
- 7.2. If you have any questions or need more information regarding international transfers of your personal data, please **Contact** us.

8. How long we use personal data for

- 8.1. We will retain your personal data for as long as we provide the Platform to you.
- 8.2. Unless we need to keep your personal data for a legitimate business reason (for example, compliance with applicable legal, tax or accounting requirements), we will delete your personal data within the period of time specified in our client's (your employer's) contract with us following the expiry or termination of our contract with them or, if we stop providing certain services in accordance with our client's (your employer's) request. We will also instruct third parties to delete personal data.

9. Data protection rights

- 9.1. If European Union or United Kingdom data protection laws apply to you, you have the right to access the personal data we hold about you and know how we use it and who we've shared it with. The Platform also allows you to access and change certain information about you through the 'User Settings' functionality. You can also ask that we delete or correct personal data that you believe is inaccurate or no longer relevant in this same way. Other countries' laws may grant you similar rights. Please make any such requests in writing to individualrights@dunnhumby.com. We may ask you for information to verify your identity (e.g. a copy of your passport, national ID or other such documentation which will allow us to determine your identity and therefore your legal right to access the personal data) or clarify your request.
- 9.2. In addition to being able to update and correct your personal data, you may also have other data protection rights:
- 9.2.1. If we have collected and processed your personal data with your consent, you have the right to withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we carried out prior to your withdrawal, nor will it affect processing of your personal data carried out in reliance on other lawful grounds other than consent.
- 9.2.2. You may have certain additional rights in relation to your personal data, such as:
- in certain circumstances you may have the right to object to our processing of your personal data or to ask us to restrict processing of your personal data (although sometimes we may not be able to comply with this request).
 - you may have your personal data erased in a number of circumstances, such as where it has been unlawfully processed, or where there are no overriding legitimate grounds for the processing.
- 9.2.3. You can make any of these requests by using the email address individualrights@dunnhumby.com. We will respond to all requests in accordance with applicable data protection laws.

- 9.2.4. You have the **right to complain to an information authority** about our collection and use of your personal information. For more information, please contact your local authority. (Contact details for authorities in the European Economic Area and UK are available [here](#).)
- 9.3. We respond to all requests we receive from individuals wishing to exercise their rights in accordance with applicable laws.

10. Cookies

Please read the [dunnhumby Sponsored Ads Platform Cookie Notice](#) for information about how we use cookies on [the Platform].

11. Changes to this Privacy Notice

- 11.1. We can update this Privacy Notice at any time and we will update this notice if we change [the Platform] in a way that changes the personal data we collect about you or how we use it; or, if the law changes so that we need to change our Privacy Notice. If we make any updates, we will inform you of the changes by posting the updated Privacy Notice on the Platform. The current version of the Privacy Notice will always be the version which you can access through the link on the Platform and replaces all previous versions.

12. Contacting us

- 12.1. If you have any queries about this Privacy Notice or the way we handle or process your personal data, please contact our Data Protection Officer via:
- email: individualrights@dunnhumby.com; or
 - post: FAO Data Protection Officer, dunnhumby Limited, 184 Shepherds Bush Road, London, England, W6 7NL

13. Data Controller

dunnhumby Limited provides the Platform and is the data controller of your personal data.

14. Additional Information

To find out more information about:

- dunnhumby, please visit [About Us](#)
- [dunnhumby Sponsored Ads Platform Cookie Notice](#) for information about how we use cookies on the Platform
- cookies in general, including how to see what cookies have been set and how to manage and disable them, visit [All About Cookies](#)

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