



PRIVACY POLICY

Fulbright Limited (“we”, “us”, “our”) are committed to protecting and respecting your privacy.

This privacy policy (“**Privacy Policy**”) and any other documents referred to herein, sets out the basis on which any personal data we collect from you when you use our Services will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By using our Services available at www.objectivemanager.com, (“**Site**”) you are accepting and consenting to the practices described in this Privacy Policy.

For the purpose of the Data Protection Act 1998 or any subsequent amendment or replacement or supplementary legislation (the “**Data Protection Legislation**”), the data controller is Fulbright Limited of Harrow House, 23 West Street, Haslemere, GU27 2AB.

INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

Information you give us. When you are registered to use our Services and/or our Site, correspond with us by phone, e-mail or otherwise or when you report a problem with our Site we may ask you to provide certain information such as, your name, photo, email address, role, department and office location.

Information we collect about you. With regard to each of your visits to our Site we may automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including pages you access or visit, and information about your use of our sites, for example the pages viewed, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

COOKIES

We use cookies on our Site to distinguish you from other users of our Site. This helps us to provide you with a good experience when you browse our Site and also allows us to improve the Site. Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the Site.



We use persistent cookies and session cookies on our Site. We use persistent cookies to save your login information for future logins to the Site. We use session cookies to enable certain features of the Site, to better understand how you interact with the Site and to monitor aggregate usage by users and web traffic routing on the Site. Unlike persistent cookies, session cookies are deleted from your computer when you log off from the Site and then close your browser.

The table below explains the cookies we use and why we use each of them.

| Cookie Type | Cookie Name | Purpose |
|--------------------|---|---|
| Analytics | Google Analytics | These cookies are used to collect information about how visitors use our Site. We use the information to compile reports and to help us improve the Site. The cookies collect information in an anonymous form, including the number of visitors to the Site, where visitors have come to the Site from and the pages they visited. |
| Error Reporting | Track JS | These cookies log, monitor and report JavaScript errors from our Site. This provides us with context about how users of our Site arrived at an error condition. They do not store, save or collect personal information. |
| ObjectiveManager | objectivemanager_production SimpleSAMLAuthToken SimpleSAMLSessionID | These cookies are used to store information about the login sessions, login settings and browser used by the user for the Site. SimpleSAML cookies are stored in addition to the objectivemanager_production cookie when logging in via SSO. They do not store personal information. |



You can set up your browser options, to stop your computer accepting cookies or to prompt you before accepting a cookie from the websites you visit. If you do not accept cookies, however, you may not be able to use the whole of the Site or all functionality of the services.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org or www.allaboutcookies.org. To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

USES MADE OF THE INFORMATION

We use information held about you in the following ways.

Information you give to us. We will use this information:

- to carry out our obligations arising from any contracts entered into between your company and us;
- to allow us to manage your account on the basis that processing is necessary in order to perform our contract with your company and to provide our Services;
- to validate information from your Human Resources team to check that the data we hold about you is accurate, consistent and up to date
- to ensure that content from our Site is presented in the most effective manner for you and for your computer.

Information we collect about you. We will use this information:

- to administer our Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our Site to ensure that content is presented in the most effective manner for you and your computer;
- as part of our efforts to keep our Site safe and secure.

DISCLOSURE OF YOUR INFORMATION

Information we share with third parties. We may share your information with selected third parties including:

- Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.



- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or your company. Analytics and search engine providers that assist us in the improvement and optimisation of our Site.

Information we disclose to third parties. We may disclose your personal data to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If we or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Standard Terms and Conditions and/or any other agreements; or to protect our rights, property, safety, our customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

WHERE WE STORE YOUR PERSONAL DATA

The personal data that we collect from you will be stored in the European Economic Area ("EEA").

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy. Your personal data will not be transferred to a country outside the EEA unless by agreement with you. In those cases, it will only be transferred to a country that provides an adequate level of protection (for example, where the European Commission has determined that a country provides an adequate level of protection) or where the recipient is bound by standard contractual clauses according to conditions provided by the European Commission ("EU Model Clauses").

Our Site is accessible via the internet and may potentially be accessed by anyone around the world. Other users may access the Site from outside the EEA. This means that where you chose to post your data on our Site, it could be accessed from anywhere around the world and therefore a transfer of your data outside of the EEA may be deemed to have occurred. You consent to such transfer of your data for and by way of this purpose.

PROTECTION OF INFORMATION

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Site, you are responsible for keeping this password confidential. We ask you not to share any password with anyone.



Unfortunately, the transmission of information via the Internet is not completely secure. Although we will endeavour to protect your personal data, we cannot guarantee the security of your data transmitted to our Site. Any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

LINKS TO OTHER WEBSITES

Our Site contains a link to a partner website to allow you to access our Help Guides and FAQ's. You will not be asked to submit any personal data to this site. Your organisation may from time to time request that we add to our Site links to internal and external websites of their choice. If you follow a link to any of these websites, please note that these websites may have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

YOUR RIGHTS

You have the right under the Act, free of charge, to request:

- Access to your personal data.
- Rectification or deletion of your personal data.
- A restriction on the processing of your personal data.
- Object to the processing of your personal data.
- A transfer of your personal data (data portability).

You can make a request in relation to any of the above rights by writing to us at the contact address given at the end of this Privacy Policy. We will respond to such queries within 30 days and deal with requests we receive from you, in accordance with the provisions of the Act.

CONSENT

You have the right to withdraw your consent to us processing your personal data, at any time, by writing to us at the contact address given at the end of this Privacy Policy.

Where we process your personal data for marketing purposes, we will inform you and obtain your opt in consent (before collecting your personal data) if we intend to use your personal data for such purposes. If you change your mind about being contacted in the future, please click on the opt out options and we will remove you from our mailing lists.



We send push notifications from time to time in order to update you about any service updates, events and promotions we may be running. If you no longer wish to receive these communications, please disable these in the settings on your device.

DATA RETENTION

We retain personal data for as long as necessary for the relevant activity for which it was provided or collected. This will be for as long as we provide access to the Site to you, your account with us remains open or any period set out in any relevant contract your company has with us. However, we may keep some data after your account is closed, where reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, maintain security, prevent fraud and abuse, resolve disputes, enforce our Standard Terms and Conditions, or fulfil your request to “unsubscribe” from further messages from us.

We will retain de-personalised information after your account has been closed.

Please note: After your account has been closed or information deleted from your account, any information you have shared with others may remain visible. We do not control data that other users may have copied from the Site.

COMPLAINTS

If you have any complaints about our use of your personal data please contact us as set out at the end of this Privacy Policy or contact our supervisory authority in the UK: The Information Commissioner’s Office at, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England (“ICO”).

CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Privacy Policy. This Privacy Policy was last updated on 25 April 2018 and replaces any other Privacy Policy previously applicable from this date.

CONTACT

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to:

Fulbright Limited of Harrow House, 23 West Street, Haslemere, GU27 2AB Or support@objectivemanager.com