

# **MTPAS privacy policy**

## **Introduction**

MTPAS is committed to protecting your privacy and security. This Privacy Statement applies to the use and processing of personal information collected and used by MTPAS

By using MTPAS website or otherwise providing your personal information to MTPAS you agree to the collection, use and sharing of your information in accordance with this statement.

Please read this Privacy Statement carefully, should you have any queries in respect of this statement or our use of personal data, please contact our data protection officer here: [myra@mtpas.co.uk](mailto:myra@mtpas.co.uk)

## **Information we collect**

We may collect information about you from a variety of sources. This includes information we collect directly from you; information we collect when you visit our sites, view our online content or use our mobile applications or other services; and information we collect about you from other sources.

### **Information we collect directly from you**

We collect information directly from you when you instruct us, enrol with MTPAS , call or email us, or otherwise provide information directly to us. The following are examples of information we may collect directly from you:

- personal details – Name, Email address, Postal address, Telephone and/or fax number;
- demographic information;
- future communication preferences.

### **Information we collect when you visit our sites, view our online ads or promotions, or use our mobile applications or other services**

We use cookies and other technologies to collect information when you visit our sites, view our online advertisements or promotions, or use our mobile applications or other services. The following are examples of information we may collect with these technologies:

- information about your device browser and operating system;
- IP address;
- web pages you view;
- links you click and/or
- information about the way you use the application.

### **Information MTPAS collects from other sources**

We may obtain information about you from other sources, including publicly available sources, social media platforms or referral agents, etc. Examples of information we may collect from other sources are:

- personal details – Name, Email address, Postal address, Telephone and/or fax number;
- demographic information and/or
- publicly observed activities or information made available by you to the public, such as blogs, videos, internet postings, and user generated content.

### **How MTPAS uses this information**

The information we collect may be used to provide you with products, offers and services, to deliver to you advertisements, offers or other content tailored to your interests, and to conduct other MTPAS business operations. We may use the information we collect to:

- answer questions or respond to your requests;
- develop new products and services;
- create and manage your account;
- protect against or identify possible fraudulent transactions;
- send you email and/or postal messages with information about MTPAS brands and other content we think may be of interest to you;
- telephone you about our brands and other content we think may be of interest to you;
- provide Marketing tailored to your interests, including interest-based marketing;
- allow you to participate in social sharing on our websites;
- analyse the use of, and develop, our products, services and marketing and
- enforce our Terms and Conditions and otherwise manage our business.

MTPAS will only process your information in pursuance of our legitimate interest if we receive any requests related to, for example, a product or service, a call-back, or specific marketing materials; we will use your personal information to fulfil your request. Where we need to manage your account and protect you against or identify possible fraudulent

transactions, we will do so in accordance with our legal obligation placed on us under law. We will seek consent from you if we need to process your data for solely identified purposes. To ensure meaningful consent is obtained from you, MTPAS will provide you with reasonable notice ensuring that your consent is provided on an informed basis.

## **Information sharing**

We will never sell your personal information to marketers outside of MTPAS. We may contact you with information about our partners, or third party products and services, but these communications will come from ourselves and will usually be incorporated in our own marketing materials.

## **Other situations**

We may transfer or otherwise process your personal information:

- to protect, defend or exercise the rights and property of MTPAS (including enforcing our Terms and Conditions) and/or
- when required by law and/or government authorities.

## **Personal Information Retention Period**

We will only use and store information for as long as it is required for the purposes it was collected for. We will retain Personal Information for the period necessary to fulfil the purposes outlined in this Privacy Statement, unless a longer retention period is required or permitted by law.

## **Communication options**

We give you choices about how we communicate with you.

### **Email Communications**

You can stop receiving promotional email messages from MTPAS by following the opt-out instructions provided in any such message you receive.

PLEASE NOTE: We will honour your request to stop receiving promotional email and postal messages from MTPAS as practicable. However, we may continue to send you service-related communications. We may keep information for record keeping to ensure we fulfil your request not to send particular types of messages.

## **You and your information**

To the extent provided for by applicable law, you have certain rights in respect of the management of the personal data we hold about you.

### **Access**

We take steps to keep your personal information accurate.

### **Other rights**

To the extent provided by applicable law, you have the right to request rectification of your personal data; to obtain restriction of the processing of personal data; to object to the processing of personal data (including direct marketing) and to data portability. To exercise any of these rights, please contact us as described below.

### **Consent**

Where you have provided consent for our processing of your personal data, you may withdraw that consent at any time by contacting us as described below. We will cease processing your personal data as soon as reasonably practicable following our receipt of your withdrawal.

### **Complaints**

If you consider that we have processed personal data in violation of applicable law, please contact us as described below. If you consider that we have processed personal data in violation of applicable law and failed to remedy such violation to your reasonable satisfaction, you may also lodge a complaint with a supervisory authority (e.g. the Information Commissioner in the UK).

# **Cookies and Other Technologies**

MTPAS and our third-party service providers use a variety of technologies to assess how our sites or mobile applications are used, to personalise your experience and to deliver you marketing, including online content, tailored to your interests. Some technologies we may use include the following:

## **Cookies**

A cookie is a small file placed on your device when you visit a site that can be understood by the site that issued the cookie. We use the information collected by cookies to remember who you are to log you in and your preferences, to provide you advertisements, offers or other content tailored to your interests and to assess how our sites are used. You can accept or decline cookies through your browser settings. To learn more, please look at the cookie settings available in your specific web browser(s). Please note, however, that without cookies you may not be able to use all of the features of our Sites or other websites and online services.

## **Other Technologies**

In conjunction with gathering information through cookies, web beacons and Javascript, our web servers may log information such as your device type, operating system type, browser type, domain, and other system settings, as well as the language your system uses and the country and time zone where your device is located. We also may record information such as the address of the web page that referred you to our Sites and the IP address of the device you use to connect to our Sites. We may log information about your interaction with the Sites, such as which pages you visit. To control which web servers collect information by automated means, we may place tags on our web pages called “web beacons,” which are small files that link web pages to particular web servers and their cookies. We also may send instructions to your device using JavaScript or other computer languages to gather the sorts of information described above and other details about your interactions with our Sites.

We may use third-party web analytics services on our Sites, such as those of Google Analytics. These service providers help us analyse how visitors use the Sites. The information obtained for this purpose (including your IP address and other information collected by automated means) will be disclosed to or collected directly by these service providers.

The providers of third-party plug-ins and widgets on our Sites, such as embedded videos and social media sharing tools, may use automated means to collect information regarding your use of the Sites and your interactions with the plug-ins and widgets. We may also receive information you have made available to those third party services, including the geographic location of your mobile device and other information about you (such as name, email address, gender, locale, time zone, languages, social media profile URL, personal website URL, biographical information, birthday, photo, list of devices, education history, work history, hometown, interests, current city, political views, favourite athlete and teams, relationship status and information, religion, name of significant other, and certain security settings information) and your contacts on those services. This information is subject to the privacy policies or notices of the third party providers of the plug-ins and widgets.

## **Links to Third Party Sites and Social Media**

MTPAS sites may include links to third-party sites. MTPAS does not control these third-party sites, and we encourage you to read the privacy statement of every site you visit.

### **Social Networks and Third-Party Plug-ins**

Our websites may include plugins from social networks or other third parties. An example of a plugin is the Facebook “Like” button. Where legally permitted, these plugins may communicate with and send information to the party that provided the plugin, even if you do not click on the plugin. This information may include your IP address, information about your browser and device, and the address of the web page you are visiting on our site. Loading, using or clicking the plugins may also place, read and transmit cookies. These cookies may contain a unique identifier the social network or third party assigns to you. The loading, functionality and your use of the plugins are governed by the privacy statement and terms of the party that provided the plugin.

### **Social Network and Third-Party Login**

Our websites may allow you to log in using a social network or other third-party account. An example of a third-party login is “Log in with Facebook.” Logging into one of our sites with your social network or other third-party account may allow us to gather information that you give us permission to access from that social network or third party. The login feature may also transfer information to the social network or third party, such as your username and password, to authenticate you. The social network or third party may also automatically

collect information such as your IP address, information about your browser and device, and the address of the web page you are visiting on our site. The login feature may also place and read cookies from that third party that may contain a unique identifier the social network or other third party assigns to you. The functionality of and your use of the login is governed by the privacy statement and terms of the party that provided the login functionality.

## **User Generated Content**

Please remember that any information you submit or post as user-generated content to Social Media sites become public information. You should exercise caution when deciding to disclose your personal, financial or other information in such submissions or posts. The MTPAS cannot prevent others from using such information in a manner that may violate this Privacy Statement, the law, or your personal privacy and safety. MTPAS is not responsible for the results of such postings.

## **Information Security**

MTPAS is committed to keeping personal information secure. We have implemented technical, administrative and physical procedures designed to protect personal information from loss, misuse or alteration.

We limit access to personal information to those who have a business need. We keep personal information only for so long as deemed reasonably necessary.

## **Children's privacy**

Our Sites are not directed to children under the age of thirteen and we do not knowingly collect personal information from children under the age of thirteen on our Sites.

## **Links to other websites and apps**

Our Sites may provide links to other websites and apps for your convenience and information. These websites and apps may operate independently from us. Linked sites and apps may have their own privacy notices or policies, which we strongly suggest you review. To the extent any linked websites or apps are not owned or controlled by us, we are not

responsible for their content, any use of the websites or apps, or the privacy practices of the websites or apps.

## **Updates to our Privacy Statement**

We will post changes to this Privacy Statement and indicate the effective date when this Privacy Statement is updated. If we make any material changes to this Privacy Statement, we will notify you by sending an e-mail to the e-mail address you most recently provided us or by posting notice of the changes on this site.