

## STV COMMERCIAL PRIVACY NOTICE

Welcome to STV Commercial's website, [www.stvcommercial.tv](http://www.stvcommercial.tv) (the "website"). STV Commercial is a trading style of STV Central Limited, a company registered in Scotland (company number SC172149), with registered office at Pacific Quay, Glasgow, G51 1PQ. STV Central Limited is the data controller responsible for looking after your personal data in line with data protection and privacy laws. This is STV Commercial's Privacy Notice. References to "we" or "us" refer to STV Commercial.

We are committed to ensuring your privacy and protecting the data we hold about you. This Privacy Notice explains how we do this and describes how and when STV Commercial collects and processes your personal data. Please note that we update our Privacy Notice from time to time, so please take a fresh read through every so often. If we make significant changes, we will make that clear on our website. Also, on specific occasions when we are collecting or processing personal data about you we may provide additional privacy notices so that you are fully aware of how and why we are using your data.

This Privacy Notice was last updated on 10<sup>th</sup> April 2024.

### 1. WHAT DATA IS COLLECTED AND WHEN?

The type of information that may be collected will vary depending on how you interact with us and includes:

**Contact Data:** Any personal data you provide to us if you (a) sign up to our mailing list or request one of our brochures or guides on our website, (b) meet with a member of our STV Commercial team in person (for example, at an event or conference) or get in touch with us via email, phone or post with any comments or questions, or (c) provide your contact details through our STV Self Service tool to build a proposed advertising campaign and calculate an approximate cost. This personal data will include things like your name, address, email address, telephone number and job title and the name of the organisation that you work for.

**Technical Data:** Includes internet protocol (IP) address, browser type and version and device identifiers, device advertising identifiers, location, operating system and platform; referring website addresses, date/time of visits, page view data, Internet service provider, click data, and information about your device including make, model and data connection type.

**Analytical Data:** Information collected from cookies and other tracking methods about how you browse and use the website including, for example, the frequency of your visits, the pages you visit on the website and the referring website address.

**Marketing Data:** Includes your instructions as to whether or not you wish to receive email marketing communications from STV Commercial.

**Data from Other Sources:** We may combine information that you provide to us with information from other sources. This includes the following:

- **Publicly available sources:** We collect data from other sources such as corporate websites, publicly available information, and information made available to us by aggregators like ALF Insights (www.alfinsights.com).
- **Third party service providers.** We engage with Workbooks Online Limited, along with their third-party processor, Spotler Limited, who provide business to business marketing services to STV Commercial. When you visit our website, Spotler drops cookies or similar technologies to gather the internet protocol (IP) address of the website visitor. Spotler will match the IP address against publicly available lists of business-only IP addresses to provide us with the name of the organisation that holds that IP address. From that information, we may infer that the website visitor works for a particular organisation.
- **Online Tracking Activity -** If you are an existing business contact on our database and/or have signed up to our mailing list, we may send marketing emails to your business contact addresses. When you open a marketing email from us and click on a link within that email that directs you to our website, Spotler will drop cookies or similar technologies on our behalf to allow us to gather information about your returning visits to the website and to understand how you interact with the website. This information is extracted and stored in our business contacts database. For more information about the cookies that we use on our website, please read our Cookie Policy.

## 2. COOKIES

When using our website, certain Technical Data and Analytical Data will automatically be collected by us and our authorised third parties by using cookies or similar technologies. We use first party and third party cookies or similar technologies on our website to improve user experience on our website and to allow us to monitor and enhance the performance of our website.

For more information about the cookies or similar technologies on our website, please read our Cookies Policy available here: [Cookie Policy](#)

## 3. WHY WE COLLECT DATA

Data protection and privacy laws permit us to collect and use your personal data on a limited number of grounds. The key grounds upon which we rely are:

- Where we need it to **fulfil a contract** we have with you.
- Where it is necessary for our **legitimate interests** and your interests and fundamental rights do not override those interests (please see below for more info).

**What do we mean by “Legitimate Interest”?** In certain situations, we collect and use your personal data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business profitably and efficiently and which does not materially impact your rights, freedoms or interests.

- Where we have your **consent**.

The are limited circumstances in which we rely on consent as our basis for processing your personal data relates to your preferences, in certain circumstances, in receiving email marketing communications from STV Commercial. We also rely on consent in relation to certain non-essential cookies or similar technologies. Where you enter a prize draw or competition, the prize donor or sponsor may wish to send you e-marketing communications. We will seek your consent

before we share any personal information with a third party for e-marketing purposes. You can opt out and change your preferences at any time, either in response to an email or on the cookie management platform.

As we explain further below, if you are a business-to-business contact of ours, we may determine that sending you marketing emails is within our legitimate interests to raise awareness of STV Commercial, promote our initiatives and to seek corporate engagement. Where we rely on the email exemption and legitimate interests, you will be given the opportunity to opt out with each communication.

- In order to comply with a **legal or regulatory obligation**.

In the table below, we have set out a summary of our activities which involve the processing of your personal data and our legal bases for doing so.

Purpose/Activity	Type of data used	Basis for processing
<p>To manage our relationship with you which will include, for example: responding to any of your comments, complaint or queries; and</p> <p>Providing you with service notices (such as changes to our services, our terms, or privacy policy).</p>	Contact	<p><b>Legitimate interests</b></p> <p>To ensure a greater user experience of our website and to ensure a greater experience of your interactions with STV Commercial.</p> <p>To comply with a legal obligation.</p>
<p>In order to provide our STV Self Service tool to build a proposed advertising campaign and calculate an approximate cost.</p>	Contact	<p><b>Performance of our contract with you.</b></p> <p><b>Legitimate interests</b> in relation to business to business contacts, where we may reach out to you to support the growth of STV Commercial’s business. See more details below.</p>
<p>If you are a business-to-business contact of ours, to send you email marketing communications about STV Commercial’s performance, including, for example, reports, results, and the latest news from STV Commercial.</p> <p>We will also contact you relating to your interaction on our website to discuss products and services that you may be interested in.</p>	Contact Marketing Technical Analytical	<p><b>Legitimate interests</b></p> <p>We will only send email marketing from STV Commercial to our business-to-business contacts where it is in our legitimate interest to raise awareness of STV Commercial, promote our initiatives and to seek corporate engagement.</p> <p>You will be given a link to opt out of such communications and can opt out at any time.</p>

<p>To organise and to hold corporate events, and to network with organisations to find out how STV Commercial can help them grow their business using advertising on STV's platforms.</p>	<p>Contact Data from Other Sources</p>	<p><b>Legitimate interests</b> For networking and PR purposes to support the growth of STV Commercial's business.</p>
<p>To enable you to partake in a prize draw, competition.</p>	<p>Contact Marketing</p>	<p><b>Performance of a contract with you</b></p>
<p>To keep in touch with established customers and to contact you as a potential customer to establish new corporate relationships.</p>	<p>Contact Data from Other Sources</p>	<p><b>Legitimate interests</b> For networking purposes and for pitching inventory to support the growth of STV Commercial's business.</p>
<p>To sell STV Commercial advertising and sponsorship inventory.</p>	<p>Contact Data from Other Sources Marketing</p>	<p><b>Legitimate interests</b> to operate STV Commercial's business in an efficient and profitable manner.</p>
<p>To process and administer payments made to us.</p>	<p>Contact</p>	<p><b>Performance of our contract with you.</b></p>
<p>To administer and protect our website (including troubleshooting, testing, system maintenance, monitoring quality and security of service, support and reporting).</p>	<p>Technical Analytical</p>	<p><b>Legitimate interests</b> To ensure the efficient and successful running of our business, network security, and to help optimise your use of the website and to give you a good user experience.</p>
<p>To drop certain non-essential cookies or similar technologies, including through Spotler to capture your internet protocol (IP) address of the website visitor through Spotler.</p> <p>We engage with Workbooks Online Limited, along with their third-party processor, Spotler Limited, who provide business to business marketing services to STV Commercial. When you visit our website, Spotler drops cookies or</p>	<p>Technical Analytical</p>	<p><b>Consent</b> For further information on our use of cookies and how to change your choices, please see our cookie policy.</p>

<p>similar technologies to gather the internet protocol (IP) address of the website visitor. Spotler will match the IP address against publicly available lists of business-only IP addresses to provide us with the name of the organisation that holds that IP address. From that information, we may infer that the website visitor works for a particular organisation and we may use that information to make speculative marketing calls and send speculative marketing emails. This information is extracted and stored on our internal database.</p> <p>Online Tracking Activity - If you are an existing business contact on our database and/or have signed up to our mailing list, we may send marketing emails to your business contact addresses. When you open a marketing email from us and click on a link within that email that directs you to our website, Spotler will drop cookies or similar technologies on our behalf to allow us to gather information about your returning visits to the website and to understand how you interact with the website. This information is extracted and stored in our business contacts database. For more information about the cookies that we use on our website, please read our Cookie Policy.</p>		
<p>To improve our website, consumer relationships and experiences.</p>	<p>Contact Technical Analytical</p>	<p><b>Legitimate interests</b></p> <p>To help us monitor, support and improve the performance, and your experience, of our website (by analysing your use and experience of our website and identifying any technical issues); to keep our website updated, and relevant and to develop our business and to inform our marketing strategy.</p>

#### 4. SHARING OF PERSONAL DATA

We share your data in the following circumstances:

- With a company within the STV group of companies, where appropriate, to process, manage and respond to an email sent by you or any other communication sent by you to us.
- When we engage data processing companies to act on our behalf from time to time to help manage your data, to provide analysis and to deliver specific functionality for example, to assist us in sending emails. We require those we share it with to respect the security of your personal data and to treat it in accordance with the law and our strict instructions.
- When we engage data processing companies to act on our behalf from time to time to facilitate our business to business marketing activities and to help us learn about your organisation and how you interact with the website, including the frequency of your visits (where you have previously engaged with STV Commercial, for example, if your organisation has purchased services from STV Commercial or if you have signed up to our mailing list). Our third-party supplier, Workbooks, along with their third-party processor, Spotler, assist us with these activities. Workbooks, and in turn Spotler, are contractually required to respect the security of your personal data and to treat it in accordance with the law and our strict instructions.
- Where we are required or permitted to do so by law or to protect or enforce our rights or the rights of any third party or our users.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy

We do not pass your personal data to any other organisation for any other purpose than as set out in this Privacy Notice.

#### **Transfers of Data Out of the UK**

If our operations necessitate transfers of personal data out of the UK, known as “restricted transfers” under UK data protection law, for example, to our authorised suppliers providing functionality or other services to us, we ensure protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- The transfer of personal data is to a country or territory covered by UK “adequacy regulations”. UK adequacy regulations set out in law that the legal framework in that country or territory has been assessed as providing “adequate” protection for people’s rights and freedoms about their personal data.
- We enter into a contract with the relevant supplier that incorporates standard data protection clauses recognised in accordance with UK data protection law. Standard data protection clauses impose contractual obligations on the sender and the receiver of personal data, and grant rights to people whose personal data is transferred.

Please contact us by email at [privacyteam@stv.tv](mailto:privacyteam@stv.tv) if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

## 5. MARKETING

We will send you marketing emails where you are a business-to-business contact of ours and where sending you marketing emails is within our legitimate interests to raise awareness of STV Commercial, promote our initiatives and to seek corporate engagement. We will also send you marketing emails where you have given consent for us to do so.

We will send you marketing information about events, competitions, initiatives or offers where you have signed up, on our website, for updates. Other marketing communications will be prompted by specific events, campaigns or initiatives we undertake.

We will contact you by phone unless you unsubscribe via the Corporate Telephone Preference Service (CTPS or TPS if you are an individual).

You can unsubscribe at any time via the unsubscribe link at the foot of any email, or contact us at [commercialmarketing@stv.tv](mailto:commercialmarketing@stv.tv).

## 6. LINKS TO OTHER SITES

To inform and enhance your experience when on website, we provide a number of links to other organisations' websites who apply their own privacy notices. Please note that this Privacy Notice will not apply to any such website. We do not control, or have any responsibility for, them.

## 8. YOUR RIGHTS

You have the right to:

- **Request access** to a copy of the personal data we hold about you (commonly known as a "subject access request").
- **Request correction** of any inaccurate personal data that we hold about you.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it.
- **Object to processing** of your personal data where we are relying on a legitimate interest. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Withdraw consent** to our sending you marketing emails where we base email marketing on consent.

If you wish to exercise any of the rights set out above, please contact us in writing using the contact details below.

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.

You have the right at any time to the Information Commissioner's Office (ICO), the UK supervisory authority 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.

## **9. DATA RETENTION AND SECURITY**

We will only retain your personal data for as is necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting 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 to our relationship with you.

If you object or withdraw consent to direct marketing, we will retain your email address on suppression for a year and then delete it. We will review the data we hold with you annually. We will maintain financial records for a period of 7 years.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

## **10. CONTACT DETAILS**

If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact our Data Governance Manager at STV Central Limited, Pacific Quay, Glasgow G51 1PQ or by email at [privacyteam@stv.tv](mailto:privacyteam@stv.tv).

**Updated: 10<sup>th</sup> April 2024**