

# Privacy Policy of NLA Media Access

NLA Media Access collects some Personal Data from its Users.

## Owner and Data Controller

NLA media access Limited, Mount Pleasant House, Lonsdale Gardens, Tunbridge Wells, Kent, TN1 1HJ.

**Owner contact email:** [dataprotection@nla.co.uk](mailto:dataprotection@nla.co.uk)

## Types of Data collected

Among the types of Personal Data that NLA Media Access collects, by itself or through third parties, there are: Usage Data; Cookies; various types of Data; first name; last name; phone number; address; email address; username; password; company name; country; ZIP/Postal code; prefix ; workplace; website; User ID; number of employees; field of activity; Data communicated while using the service; payment data; answers to questions; geographic position; name; date of birth; academic background; social media accounts ; Universally unique identifier (UUID); profession; calendar information.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using NLA Media Access.

Unless specified otherwise, all Data requested by NLA Media Access is mandatory and failure to provide this Data may make it impossible for NLA Media Access to provide its services. In cases where NLA Media Access specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools – by NLA Media Access or by the owners of third-party services used by NLA Media Access serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy.

Users are responsible for any third-party Personal Data obtained, published or shared through NLA Media Access.

## Mode and place of processing the Data

### Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of NLA Media Access (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

### Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

### Retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

## The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Displaying content from external platforms, Tag Management, Interaction with external social networks and platforms, Analytics, Data transfer outside the EU, Managing data collection and online surveys, Platform services and hosting, Traffic optimization and distribution, Registration and authentication provided directly by NLA Media Access, Interaction with live chat platforms, Handling payments, Hosting and backend infrastructure, Managing support and contact requests, Managing contacts and sending messages, Handling activities related to productivity and Contacting the User.

For specific information about the Personal Data used for each purpose, the User may refer to the section “Detailed information on the processing of Personal Data”.

## **Detailed information on the processing of Personal Data**

Personal Data is collected for the following purposes and using the following services:

### **Analytics**

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

#### **Google Analytics with anonymized IP (Google Ireland Limited)**

Google Analytics is a web analysis service provided by Google Ireland Limited (“Google”). Google utilizes the Data collected to track and examine the use of NLA Media Access, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network. This integration of Google Analytics anonymizes your IP address. It works by shortening Users' IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the US.

Personal Data processed: Cookies; Usage Data.

Place of processing: Ireland – [Privacy Policy](#) – [Opt Out](#).

#### **Wordpress Stats (Automattic Inc.)**

Wordpress Stats is an analytics service provided by Automattic Inc.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – [Privacy Policy](#).

### **Contacting the User**

#### **Contact form (NLA Media Access)**

By filling in the contact form with their Data, the User authorizes NLA Media Access to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal Data processed: company name; email address; first name; last name; number of employees; phone number; physical address; profession; various types of Data; website.

### **Data transfer outside the EU**

The Owner is allowed to transfer Personal Data collected within the EU to third countries (i.e. any country not part of the EU) only pursuant to a specific legal basis. Any such Data transfer is based on one of the legal bases described below.

Users can inquire with the Owner to learn which legal basis applies to which specific service.

#### **Data transfer abroad based on standard contractual clauses (NLA Media Access)**

If this is the legal basis, the transfer of Personal Data from the EU to third countries is carried out by the Owner according to “standard contractual clauses” provided by the European Commission. This means that Data recipients have committed to process Personal Data in compliance with the data protection standards set forth by EU data protection legislation. For further information, Users are requested

to contact the Owner through the contact details provided in the present document.

Personal Data processed: various types of Data.

### **Data transfer from the EU and/or Switzerland to the U.S based on Privacy Shield (NLA Media Access)**

If this is the legal basis, the transfer of Personal Data from the EU or Switzerland to the US is carried out according to the EU - U.S. and Swiss - U.S. Privacy Shield.

In particular, Personal Data is transferred to services that self-certify under the Privacy Shield framework and therefore guarantee an adequate level of protection of such transferred Data. All services are listed within the relevant section of this document and those that adhere to Privacy Shield can be singled out by checking their privacy policy and possibly also by specifically checking for Privacy Shield adherence in the official Privacy Shield List. Privacy Shield also specifically guarantees rights to Users which can be found in its most current form on the website run by the US Department of Commerce.

Personal Data may be transferred from within the EU or Switzerland to the U.S. to services that are not, or not anymore, part of Privacy Shield, only based on other valid legal grounds. Users can ask the Owner to learn about such legal grounds.

Personal Data processed: various types of Data.

### **Displaying content from external platforms**

This type of service allows you to view content hosted on external platforms directly from the pages of NLA Media Access and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

#### **Google Fonts (Google Ireland Limited)**

Google Fonts is a typeface visualization service provided by Google Ireland Limited that allows NLA Media Access to incorporate content of this kind on its pages.

Personal Data processed: Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: Ireland - [Privacy Policy](#).

#### **YouTube video widget (Google Ireland Limited)**

YouTube is a video content visualization service provided by Google Ireland Limited that allows NLA Media Access to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland - [Privacy Policy](#).

#### **YouTube video widget (Privacy Enhanced Mode) (Google Ireland Limited)**

YouTube is a video content visualization service provided by Google Ireland Limited that allows NLA Media Access to incorporate content of this kind on its pages.

This widget is set up in a way that ensures that YouTube won't store information and cookies about Users on NLA Media Access unless they play the video.

Personal Data processed: Trackers; Universally unique identifier (UUID); Usage Data.

Place of processing: Ireland - [Privacy Policy](#).

### **Handling activities related to productivity**

This type of service helps the Owner to manage tasks, collaboration and, in general, activities related to productivity. In using this type of service, Data of Users will be processed and may be retained, depending on the purpose of the activity in question.

These services may be integrated with a wide range of third-party services disclosed within this privacy policy to enable the Owner to import or export Data needed for the relative activity.

#### **Workable (Workable Software Limited)**

Workable is a service that supports the Owner in managing HR processes, provided by Workable Software

Limited. In particular, it allows the Owner to communicate with candidates and keep track of the recruiting process.

Personal Data processed: academic background; Data communicated while using the service; date of birth; email address; geographic position; name; phone number; physical address; social media accounts ; Usage Data.

Place of processing: United Kingdom – [Privacy Policy](#).

### **Calendly (Calendly, LLC)**

Calendly is a service provided by Calendly, LLC, that facilitates online scheduling of appointments.

Personal Data processed: calendar information; email address; name.

Place of processing: United States – [Privacy Policy](#).

### **Handling payments**

Unless otherwise specified, NLA Media Access processes any payments by credit card, bank transfer or other means via external payment service providers. In general and unless where otherwise stated, Users are requested to provide their payment details and personal information directly to such payment service providers. NLA Media Access isn't involved in the collection and processing of such information: instead, it will only receive a notification by the relevant payment service provider as to whether payment has been successfully completed.

### **Sage Pay (Sage Pay Europe Limited)**

Sage Pay is a payment service provided by Sage Pay Europe Limited.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United Kingdom – [Privacy Policy](#).

### **Payment by bank transfer (NLA Media Access)**

In the event that the chosen payment method is a direct bank transfer to the current account indicated by NLA Media Access, the Owner will collect the payment details of the User, i. e. the current account number of the sender, the SWIFT code, the bank and the name of the sender. Such data will be collected and processed exclusively within the transaction and for billing purposes only.

Personal Data processed: address; company name; first name; last name; payment data.

### **Hosting and backend infrastructure**

This type of service has the purpose of hosting Data and files that enable NLA Media Access to run and be distributed as well as to provide a ready-made infrastructure to run specific features or parts of NLA Media Access.

Some services among those listed below, if any, may work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

### **Microsoft Azure (Microsoft Corporation)**

Microsoft Azure is a hosting service provided by Microsoft Corporation.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United Kingdom – [Privacy Policy](#).

### **Google Cloud Storage (Google LLC)**

Google Cloud Storage is a hosting service provided by Google LLC.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United Kingdom – [Privacy Policy](#).

### **Kinsta**

<https://kinsta.com/legal/privacy-policy/>

### **Google BigQuery (Google Ireland Limited)**

Google BigQuery is a hosting and backend service provided by Google Ireland Limited.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: Ireland – [Privacy Policy](#).

### **Interaction with external social networks and platforms**

This type of service allows interaction with social networks or other external platforms directly from the pages of NLA Media Access.

The interaction and information obtained through NLA Media Access are always subject to the User's privacy settings for each social network.

This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it.

It is recommended to log out from the respective services in order to make sure that the processed data on NLA Media Access isn't being connected back to the User's profile.

### **Twitter Tweet button and social widgets (X Corp.)**

The Twitter Tweet button and social widgets are services allowing interaction with the Twitter social network provided by Twitter, Inc.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – [Privacy Policy](#).

### **LinkedIn button and social widgets (LinkedIn Corporation)**

The LinkedIn button and social widgets are services allowing interaction with the LinkedIn social network provided by LinkedIn Corporation.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – [Privacy Policy](#).

### **Interaction with live chat platforms**

This type of service allows Users to interact with third-party live chat platforms directly from the pages of NLA Media Access, for contacting and being contacted by NLA Media Access support service.

If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service. Moreover, live chat conversations may be logged.

### **Olark Widget (Habla, Inc.)**

The Olark Widget is a service for interacting with the Olark live chat platform provided by Habla, Inc.

Personal Data processed: Cookies; Data communicated while using the service; Usage Data.

Place of processing: United States – [Privacy Policy](#).

### **Managing contacts and sending messages**

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

### **Sendgrid (Sendgrid)**

Sendgrid is an email address management and message sending service provided by Sendgrid Inc.

Personal Data processed: company name; email address; first name.

Place of processing: United States – [Privacy Policy](#).

## **Managing data collection and online surveys**

This type of service allows NLA Media Access to manage the creation, deployment, administration, distribution and analysis of online forms and surveys in order to collect, save and reuse Data from any responding Users.

The Personal Data collected depend on the information asked and provided by the Users in the corresponding online form.

These services may be integrated with a wide range of third-party services to enable the Owner to take subsequent steps with the Data processed - e.g. managing contacts, sending messages, analytics, advertising and payment processing.

### **Survey Gizmo**

<https://www.surveygizmo.com/privacy/>

### **Google Forms (Google Ireland Limited)**

Google Forms is a form builder and data collection platform provided by Google Ireland Limited.

Personal Data processed: answers to questions; company name; email address; first name; last name.

Place of processing: Ireland - [Privacy Policy](#).

## **Managing support and contact requests**

This type of service allows NLA Media Access to manage support and contact requests received via email or by other means, such as the contact form.

The Personal Data processed depend on the information provided by the User in the messages and the means used for communication (e.g. email address).

### **Jira**

<https://www.atlassian.com/legal/privacy-policy>

### **Zendesk (Zendesk, Inc.)**

Zendesk is a support and contact request management service provided by Zendesk Inc.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States - [Privacy Policy](#).

## **Platform services and hosting**

These services have the purpose of hosting and running key components of NLA Media Access, therefore allowing the provision of NLA Media Access from within a unified platform. Such platforms provide a wide range of tools to the Owner - e.g. analytics, user registration, commenting, database management, e-commerce, payment processing - that imply the collection and handling of Personal Data.

Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

### **Squarespace (Squarespace, Inc)**

Squarespace is a platform provided by Squarespace, Inc. that allows the Owner to build, run and host NLA Media Access. Squarespace is highly customizable and can host websites from simple blogs to complex e-commerce platforms.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States - [Privacy Policy](#).

## **Registration and authentication provided directly by NLA Media Access**

By registering or authenticating, Users allow NLA Media Access to identify them and give them access to dedicated services. The Personal Data is collected and stored for registration or identification purposes only. The Data collected are only those necessary for the provision of the service requested by the Users.

## **Direct registration (NLA Media Access)**

The User registers by filling out the registration form and providing the Personal Data directly to NLA Media Access.

Personal Data processed: address; company name; Cookies; country; email address; field of activity; first name; last name; number of employees; password; phone number; prefix ; Usage Data; User ID; username; website; workplace; ZIP/Postal code.

## **Tag Management**

This type of service helps the Owner to manage the tags or scripts needed on NLA Media Access in a centralized fashion.

This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

### **Google Tag Manager (Google Ireland Limited)**

Google Tag Manager is a tag management service provided by Google Ireland Limited.

Personal Data processed: Usage Data.

Place of processing: Ireland - [Privacy Policy](#).

## **Traffic optimization and distribution**

This type of service allows NLA Media Access to distribute their content using servers located across different countries and to optimize their performance.

Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between NLA Media Access and the User's browser. Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information of the User are transferred.

### **Cloudflare (Cloudflare Inc.)**

Cloudflare is a traffic optimization and distribution service provided by Cloudflare Inc.

The way Cloudflare is integrated means that it filters all the traffic through NLA Media Access, i.e., communication between NLA Media Access and the User's browser, while also allowing analytical data from NLA Media Access to be collected.

Personal Data processed: Cookies; various types of Data as specified in the privacy policy of the service.

Place of processing: United States - [Privacy Policy](#).

## **Cookie Policy**

NLA Media Access uses Trackers. To learn more, Users may consult the [Cookie Policy](#).

## **Additional information about Data collection and processing**

### **Legal action**

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of NLA Media Access or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

### **Additional information about User's Personal Data**

In addition to the information contained in this privacy policy, NLA Media Access may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

## **System logs and maintenance**

For operation and maintenance purposes, NLA Media Access and any third-party services may collect files that record interaction with NLA Media Access (System logs) or use other Personal Data (such as the IP

Address) for this purpose.

## **Information not contained in this policy**

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

## **Changes to this privacy policy**

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within NLA Media Access and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

## **Definitions and legal references**

### **Personal Data (or Data)**

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

### **Usage Data**

Information collected automatically through NLA Media Access (or third-party services employed in NLA Media Access), which can include: the IP addresses or domain names of the computers utilized by the Users who use NLA Media Access, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

### **User**

The individual using NLA Media Access who, unless otherwise specified, coincides with the Data Subject.

### **Data Subject**

The natural person to whom the Personal Data refers.

### **Data Processor (or Processor)**

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

### **Data Controller (or Owner)**

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of NLA Media Access. The Data Controller, unless otherwise specified, is the Owner of NLA Media Access.

### **NLA Media Access (or this Application)**

The means by which the Personal Data of the User is collected and processed.

### **Service**

The service provided by NLA Media Access as described in the relative terms (if available) and on this site/application.

### **European Union (or EU)**



Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

### **Cookie**

Cookies are Trackers consisting of small sets of data stored in the User's browser.

### **Tracker**

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

### **Legal information**

This privacy policy relates solely to NLA Media Access, if not stated otherwise within this document.

Latest update: July 08, 2023