

Privacy and Cookies Policy

This Privacy and Cookies Policy (this “**Policy**”) demonstrates how Briefcase.news Limited (a company registered in England and Wales under registration number 08811304 with registered office at 85 Fleet Street, London, EC4Y 1AE) (“**we**”, “**us**” or “**our**”) handles personal data and what we learn about you from your use of our “Briefcase.news” application for mobile and non-mobile devices (the “**App**”).

This Policy applies to how we handle personal data about individuals who use our services, including prospective users. It applies to the following:

- The use of our website at <https://www.briefcase.news> other than through the App; for example, if you request a demo by completing the form on our website.
- When we use your personal data for marketing purposes; for example, if we send you an email about our services.
- Where you are a “**Corporate Representative**”. This applies where we hold your personal data because you are employed or engaged by or working at or advising or otherwise a representative or a point of contact at a corporate or other organisation that is directly or indirectly using our services through receipt of licences for Corporate Users to use and receive the App and content from the App (a “**Corporate**”). For example, we may have your name, email address and business contact details so that we can provide you or other Corporate Representatives with receipt of our service, and respond to contract or service related questions or provide technical support.
- Where you have been given a licence to use the App from or to work with a Corporate (a “**Corporate User**”).
- Where you are a “**Consumer User**”. A Consumer User means an individual who has purchased our services on their own behalf rather than on behalf of a Corporate.

Often, an individual will fall under more than one of the categories above. For example, if you are our main point of contact at a Corporate and you have also been given a licence to use the App, then you will be a Corporate Representative in respect of when we process your personal data as the point of contact and you will be a Corporate User in respect of when we process your personal data in order to give you access to the App.

We may modify or update this Policy from time to time, so please review it periodically whenever you use the App. If you have any queries regarding this Policy or complaints about our use of your personal data, please contact us at support@briefcase.news and we will do our best to deal with your complaint or query as soon as possible.

Handling personal data of Corporate Users where we are a processor

Except as described in this section of the Policy, we are a “controller” (also known as a “data controller”), which means that we are responsible for deciding how and why we hold and use personal data about you and explaining it clearly to you.

Corporate Users: Some Corporates have received licences for users to use and receive the App and content from the App, such users are referred to as Corporate Users in this Policy. If you are a Corporate User, i.e., if you are a user who has been given a licence from or to work with a Corporate, we are a “processor” (directly or indirectly) on behalf of your Corporate for the purposes of providing the App and content to you on behalf of that Corporate. The Corporate is the controller. This is because, for this purpose, we are using your personal data to provide the App and content on the instructions of the Corporate rather than using your personal data for our own purposes.

If the Corporate or its adviser asks us to give you access to the App then the Corporate or its adviser will provide your name and email address to us to allow us to set up an account for you. This is for your Corporate’s and their adviser’s legitimate interests in giving you access to the App and content, i.e. in creating a high level of knowledge about the Corporate and the business world that is relevant to the Corporate’s business.

When you use the App as a Corporate User, we may also use your personal data for the purposes of:

- Verifying your identity and who you represent (for example, when you return to the App)
- Sending you emails about your account, changes to the App or service we provide or technical or security notices.
- Notifications with a new briefing in the service.

We use cookies to recognise you when you access the App. We are a processor in relation to the cookies used for this purpose. These cookies are known as “strictly necessary cookies” because they are necessary to authenticate you and to provide the App to you. Please see the section below on cookies for more information.

For further information about how your Corporate uses your personal data, please contact your Corporate direct. If there is any inconsistency between what is set out in this section above and any privacy notice information your Corporate has provided to you, then the information provided by your Corporate takes precedence.

Sometimes, we will be a controller for some purposes and a processor for others. For example, if we add you to our mailing list to receive our newsletter, then we are a controller for the purposes of sending you our newsletter and a processor for the purpose of giving you access to the App on behalf of your Corporate as described in this section.

What we do with your personal data

We use your personal data for the following purposes:

If you are a Consumer User, we will use your personal data in order to:

- Provide you with the services you have requested. As part of this, we use your personal data in relation to service updates, maintenance and technical support. We may also contact you in case we have any queries or to answer your queries.
- Manage payments, fees and charges. This includes the collection and recovery of money owed to us.

If you are a Corporate Representative, we will use your personal data in order to provide your Corporate, and its advisors with the services we have agreed to provide. As part of this, we also use your personal data in relation to service updates, maintenance and technical support. We may also contact you in case we have any queries or to answer your queries.

Regardless of our relationship with you, we will use your personal data in order to:

- Manage our interactions with you; for example, to notify you if our contact details change.
- Improve our services and make us better; for example, if you gave us feedback.
- Protect our interests and the interests of our staff; for example, if we decided to take action because you had breached our Acceptable Use Policy.

We may also use your personal data in order to market and promote what we do.

This includes identifying and contacting individuals who we think would be interested in our services and sending newsletters and information about our services.

As with the above, we may use your personal data for this purpose regardless of our relationship with you.

If you do not wish to receive marketing messages, you can notify us by email at support@briefcase.news.

- At the time of collecting your personal data and each time we send you our newsletter or other marketing information, we will provide an opportunity for you to unsubscribe from receiving this information from us.
- When you use the App, then your IP address and other data about your computer or mobile device is logged for administrative and security reasons and to collate statistical (non-personal) data about the use of the App.
- Notifications with a new briefing in the service.

Please note that we may process your personal data without your knowledge or consent, where this is required or permitted by law.

What are the lawful bases for us to use your personal data?

We will only use your personal data when the law allows us to. Most commonly, we rely on the following lawful bases:

- **Necessary for contract:** If you are a Consumer User, then we will use your personal data where necessary for the performance of our contract with you or in order to take steps at your request prior to entering into a contract. For example, we need to use your personal data to provide the App to you and to ensure payment of our fees.
- **Legitimate interests:** We will use your personal data where this is necessary for our legitimate interests (or those of a third party such as your Corporate or someone providing services in relation to your Corporate) and your interests and fundamental rights do not override those interests.
- **Our legitimate interests are:** to ensure the smooth running of our business; to provide tailored market information and services to our subscribers (both Consumer Users and Corporates) and their users; managing our relationships with individuals and Corporates, to protect our interests and the interests of our staff, and to market and promote what we do.

Unless we notify you otherwise, we rely on legitimate interests for all of the processing described in the section above, except for the Consumer User specific purposes.

Very occasionally, we may rely on another lawful basis; for example, if we had a legal obligation to share your personal data with a third party, then we would be relying on “legal obligation” as our lawful basis.

The types of personal data that we obtain about you and where it comes from

The types of personal data that we collect include some or all of the following: your name, your job title and role, the name of the organisation you are employed or engaged by or work at or advise or are otherwise a representative of, your relationship with that organisation, your contact details such as your email address and telephone number, and your subscription (or publication) details. If you provide a password, this is encrypted on receipt by our systems.

If you do not provide us with your personal data detailed above, we may not be able to provide our services to you or the organisation you work for.

Often, we get personal information from you; for example, when you contact us. In addition, we get information from a number of other sources as follows:

- The organisation that you work for.
- Information available through the internet, for example, through web searches and your profile on LinkedIn.
- Through our professional contacts and networking; for example, where one of our contacts tells us that you may be interested in our services.
- Our other Group entities, who may provide your details to us if they consider that you would be interested in our services. We may also receive personal data if necessary or appropriate where we and other members of our Group provide services to your Corporate.

Disclosing personal data to third parties

We will share your personal data with third parties where required by law, where it is necessary to administer the working relationship with you or your Corporate or where we have another legitimate interest in doing so.

We may disclose your personal data to third parties in the following circumstances:

Third party service providers: We use third parties to provide services and manage the App. These may include hosting service providers. These third party service providers will be given access only to that personal data needed to perform their support functions and they are prohibited from using it for other purposes.

We require them to enter into data security and confidentiality obligations.

Sharing with publishers/content providers: We may share your name and email address with the licensor, supplier or publisher or content provider where you have requested content not covered by an existing licence. This is to enable them to contact you in order to discuss purchasing the necessary licence.

Legal Disclosure: In some cases, we may be required to disclose your personal data to comply with legal requirements.

Our other Group entities: We may share your personal data with other members of our Group to make relevant introductions if we consider that you, your Corporate or employer may like to receive or engage with a Group member's services. Our "Group" means Vox Media Limited (a company registered in England under registration number 05197361 and whose registered address and principal place of business is at 85 Fleet St, London EC4Y 1AE) and Tulchan Communications LLP (a limited liability partnership registered in England and Wales under number OC353291 with registered office at 85 Fleet Street, London EC4Y 1AE).

Sale of business: We may transfer our databases containing your personal data if we sell our business or part of it.

In addition, our website and App may contain links to other websites or frames of other websites. Please be aware that we are not responsible for the privacy or cookies practices or content of those third parties or other websites, nor for any third party to whom we transfer your personal data in accordance with our Policy. You should check their privacy and cookies practices before using their services and sites.

Sharing with others: We may share your personal data with government bodies, our professional advisors (such as our lawyers) and insurers.

We may remove the parts of your personal data that can identify you and collate it with other anonymised data before sharing it with third parties.

Security of personal data

We recognise the need to ensure that personal data gathered via the App remains secure. Our App has good security measures in place which are designed to protect against the loss, misuse and alteration of the personal data under our control. You acknowledge that although we exercise adequate care and security there remains a risk that information transmitted over the internet and stored by computer may be intercepted or accessed by an unauthorised third party. You should also ensure the security of data by taking appropriate steps yourself, including keeping your password secure and confidential. If you have any concerns or questions, please email us at the address provided above in this Policy.

How long do we retain your personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, 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 of our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Your rights in your personal data

You have the right to object to any use of your personal data where we are relying on legitimate interests as our lawful basis. You also have a right to object to the use of your personal data for marketing purposes.

In addition, you have the right to restrict the processing of your personal data, to have access to your personal data, to have inaccurate personal data rectified, to have personal data erased, and to receive a copy of your personal data in a portable form, in each case to the extent permitted by law.

If ever we process your personal data on the basis of your consent, you have a right to withdraw that consent at any time.

You have a right to lodge a complaint with a data protection supervisory authority. The supervisory authority in the UK is the Information Commissioner's Office - www.ico.org.uk. If you do have any concerns about how we have handled your personal data, we would kindly ask that you contact us in the first instance before you speak to the ICO so that we have an opportunity to put things right.

If you are a Consumer User, to exercise any of the above rights, please contact support@briefcase.news.

Cookies and similar technologies

The App and our website use cookies. A "cookie" is a small text file that is stored on your computer or mobile device when you visit a website or open an app.

Each time you visit the website or App from the same device, a message is sent back to the server, allowing the website or App to recognise your device and remember if you have visited the website or App before. This is to authenticate users, improve functionality and for analytics, as explained below.

We may use cookies to store email addresses and authentication tokens (not a user's actual password).

We use the following types of cookies:

Strictly necessary cookies. These are cookies that are required for the operation of the App. They enable you to log into the App and enable us to authenticate you as a registered user. This necessarily involves processing your personal data.

We use a third party cookie set by Stripe.com that allows our Consumer Users to make payment for our services. This cookie expires after 1 year.

Functionality cookies. We also use a third party cookie set by Intercom to give us information that helps us provide technical support. For example, the cookie helps us to know when you last logged in, and what version of our App you are running. This cookie expires after 1 year.

Analytical or performance cookies. These allow us to recognise and count the number of visitors and to see how visitors move around our App and our website when they are using it. This helps us to improve the way our App and website works; for example, by ensuring that users are finding what they are looking for easily. As part of this, we use cookies to estimate our audience size, analyse trends and general usage patterns in relation to our App and website, and optimise the experience of using our App and website.

We use Google Analytics. Google Analytics is a simple tool that helps website and app owners like us measure how users like you engage with our website and App and the content we have on our website and App. Google Analytics uses third party cookies, which report on how you use our website and App. This may let us collect data about your computer, including your IP address, to help us to manage our website and App and to create reports that tell us about how users browse our website and App and their patterns of use. When we use Google Analytics, this helps us to help you, so we can improve our website and App. These cookies expire after two years.

In addition, publishers of third party content (such as third party websites to whom you may link when using our service or App) may have their own cookies and privacy practices and it is your responsibility to check out their cookies and privacy policies.

The website at <http://www.allaboutcookies.org> (run by the Interactive Marketing Bureau) contains more information about cookies, and at <http://www.allaboutcookies.org/manage-cookies/index.html> there is step-by-step guidance on how cookies can be switched off. Please be aware that if you do not accept cookies, the App may not function correctly or at all.

With the exception of the strictly necessary cookies that we use to authenticate you, by using the App without disabling cookies, you are consenting to our use of cookies as described in this Policy.

We may also track when an individual has opened an email from us and the links and content that they follow. This helps us to build up a picture of how individuals use our services, access content and engage with us. This in turn helps us to improve our services and engage with individuals more effectively.

We have a presence on LinkedIn and on YouTube. Both set cookies that provide us with statistical information about how users interact with our content on these platforms.

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