

Your right to privacy

Your right to privacy is important to us. We take the security of your information seriously and have policies and processes in place to ensure it remains safe.

This notice describes the way we collect information, how we use it and how we protect it.

Who we are

We are Aarna Cybernetics Ltd T/as “Consumer Today”, a company registered in England and Wales under registration number 15228855 at 20 Wenlock Road, London, N1 7GU.

Aarna Cybernetics Ltd is part of the Aarna Cybernetics Private Limited family, which is a company registered in India under registration number U72200WB2012PTC181162 and F/19 Joyrampur Jala Road Sarada Ma Upanibesh, Parnasree Pally, Kolkata.

You can find our website at: www.aarnacybernetics.com

Because we are based outside the United Kingdom and European Union, we appointed Business Risk and Compliance Experts Ltd as our local representative. You can contact them by email at aarna@brace-solutions.com or by telephone on 01772 720 078.

Alternatively, if you would rather contact us directly, our main point of contact for data protection is Pritam Bajpai, and you can contact him by telephone at +91 9830735523 or email at complainece@aarnacybernetics.com

Categories of information we collect

Personal data means any information that can identify a specific individual. While completing a survey, we collect several types of personal data from you, which can be categorised into the following types:

- Demographic

This includes information relating to your gender, name, date of birth and contact details.

- Life stage Lifestyle

This includes information relating to your marital status, type of employment, household income and presence of children.

- Description

This includes information relating to your likes and dislikes or your hobbies and interests, e.g. your travel preferences.

- Purchase intent

This includes information relating to your household bills or making home improvements.

Information we hold about you

When you enquire about or use our services, we collect personal information about you.

Personal information we collect and hold may include:

- name, address, and e-mail address;
- telephone number;
- information about services you use and other related information;
- information we need to be able to process payments for you, for example, bank and credit or debit card details;
- records of contact with you, such as system notes, emails, and letters or;
- campaign-specific data, which we will discuss with you before collecting or otherwise processing.
- Details of your travel preferences, including holidays, hotels, airlines and travel booking
- Lifestyle information

We never ask for special category data, which includes medical history, religious or political beliefs and union membership, and we will never ask for financial information. You always have the right to refuse to answer any question.

How long we keep your information

We will keep your personal information only for as long as necessary in line with regulatory and legal requirements and destroy it securely when it is no longer needed. We have a retention schedule that we use to manage the length of time we keep personal data, and if you would like to know any specific timescales listed on it, please contact us using the details below.

How we protect your information

The security of your information is important to us. We protect your information by maintaining physical, electronic, and procedural safeguards in relation to the collection, storage, and disclosure of personal data to prevent unauthorised access, accidental loss, disclosure, or destruction.

No data transmission over the internet can be entirely secure, and therefore, we cannot guarantee the security of your personal information and/or use of our sites. However, we use our reasonable endeavours to protect the security of your personal information from unauthorised access.

Where we process your information

We may process your information outside the UK or European Union. Where this is the case, we will only transfer your information to other countries outside the EEA if it is unavoidable to allow us to deliver our products and services. If we do, we take care to ensure the same level of privacy and security as the UK.

How we get and use your personal information

Most of the personal information we process is provided to us directly by you. We will only collect, use, hold or disclose personal information where we have a lawful basis to do so.

How we share your information

From time to time, we may send information to, receive information from, or exchange your personal information with partners or agents who support us in delivering our products and services to you, or that we refer you to, or that refer you to us;

- companies who perform essential services for us;
- third-party organisations that conduct research, analysis, and marketing activities on our behalf;
- regulators, courts, or other public authorities;
- the emergency services in the case of an accident or emergency
- health & well-being companies
- call centres
- charities
- media & publishing companies, leisure, Aditus (publishers of National Geographic and Auto Express), gaming / gambling, legal services, educational institutions, government, market research and mobility Sector.
- claims Management Service Personal Injury Claims
- financial products/services Claims such as Credit / bank card charges, Unenforceable consumer credit agreements, Mis-sold PPI, Mis-sold mortgages, pensions, and investments, SERPS.

We will only share or exchange data with third parties with the protection of a written agreement and the ability to oversee their activities unless information is required for regulatory reasons.

We may share your information with organisations based outside the UK and / or European Union. Where this is the case, we will only do so provided that organisation complies with local data protection regulations and with a written agreement.

Where we have relationships with other organisations that process your information on our behalf, we take care to ensure they have high data security standards. We will not allow these organisations to use your personal information for unauthorised purposes.

Our Third parties Sponsors may contact you for the purposes of direct marketing by Email marketing, post, telephone, SMS/MMS Mobile Message Marketing or Social Media Advertising.

Those third parties who would wish to send you marketing or to advertise to you will fall into the following categories: Retail Online retail General stores, Automotive (including dealerships and

accessories), Property, Home furnishings, Home improvement, Fashion, and clothing, FMCG and Pharmaceutical, IT and home computing, and Telecoms and utilities. Finance Pensions insurance Home, Car, Travel, Pet, Personal and other insurances.

Marketing service providers

We may share your data under strict license terms with marketing service providers for the purposes of creating products and services to help organisations understand the likely characteristics of their customers, communicate with them more effectively, and find others like them across a range of marketing channels. The marketing service providers we share data with includes – Aura Media Group Ltd <https://www.auramedigroup.co.uk/privacy-policy>,

How we comply with data protection regulations

We are committed to safeguarding your personal information and we are legally obliged to use your information in line with all laws concerning the protection of personal information.

The lawful bases that we rely on for processing your information are:

- Your consent, which you can remove at any time;
- We have a contractual obligation;
- We have a legal obligation;
- We have a vital interest;
- We need it to perform a public task; or
- We have a legitimate interest.

Where we process data for the purposes of surveying or marketing, including when we share information with third parties, we will typically do so under the lawful bases of your consent or legitimate interest, as detailed below:

- We use your consent to contact you by email for the purpose of marketing or surveying
- We use your consent to contact you by SMS for the purpose of marketing or surveying
- We use your consent to contact you by telephone for the purpose of marketing or surveying where your details appear on the telephone preference service (TPS)
- We use legitimate interest to contact you by telephone for the purpose of marketing or surveying provided that your details do not appear on the telephone preference service (TPS)
- We use your consent to contact you by mail for the purpose of marketing or surveying where your details appear on the mail preference service (MPS)
- We use legitimate interest to contact you by mail for the purpose of marketing or surveying provided that your details do not appear on the mail preference service (MPS)
- We use legitimate interest to profile your data
- We use legitimate interest or your consent to share information with third parties, depending on the nature of our agreement with those third parties.
- Where processing is based on legitimate interest, you have the right to object at any time using the contact details below.

Where processing is based on consent, you have the right to withdraw your consent at any time using the contact details below.

We may also monitor and keep records of email communications which you send to us and other communications with you in accordance with this policy and our other business interests.

We may also receive personal information indirectly, when such information is provided to us by our clients. information needed to provide you with a product or service, to satisfy legal or regulatory requirements, or where we have your consent.

We may use your data for the following purposes:

- Conducting surveys – we may contact you by email, SMS, or telephone to carry out surveys and then share your details with selected companies who want to contact you for the purposes of marketing.
- Direct Marketing – we may contact you by email, SMS, or telephone for the purposes of marketing.
- Profiling - we may profile your information to help our clients deliver marketing communication that is more relevant to you. We will never make automated decisions about you which would have

a negative impact on your rights, and you have the right to request that this is stopped at any time using the contact information below.

We may also use your information to:

- communicate with you;
- keep our records up to date
- process payments;
- for the investigation of or prevention of crime;
- for research and statistical purposes;
- to disclose to regulatory bodies for the purposes of monitoring and/or enforcing our compliance with their requirements;
- process job applications;
- gain feedback from you;
- prevent crime and meet our legal obligations;
- prudentially manage our business using models and forecasts;
- keep you informed of other relevant products or services that may be of interest to you where you have provided consent.

If the business is reorganised or sold to another organisation, we may transfer any personal information we hold to that organisation.

In the event that a third party may deliver all or part of the service requested by you, whilst the information you provide will be disclosed to them, it will only be used for the administration of the service provided and to maintain management information for business analysis.

How you can manage the information we hold and how we use it

Data protection regulations mean you have rights over how we hold and use the information we hold about you:

- **Your right to manage consents**

You have the right to give your consent to us using your data for any activities we do not have another lawful basis to carry out, for example sending you marketing communications. You can withdraw consent at any time.

- **Your right of Access**

You have the right to request access to the information we hold about you; this is called a Data Subject Access Request

- **Your right to know about sharing**

You have the right to know who your data is shared with and why

- **Your right to rectification**

You have the right to have your details updated if they are inaccurate and for information not required for lawful reasons to be deleted. You also have the right to ask us to complete information you think is incomplete.

- **Your right to erasure**

You have the right to ask us to erase your personal information.

- **Your right to object to processing**

You have the the right to object to the processing of your personal data in certain circumstances.

- **Your right to restriction of processing**

You have the right to have automated processing and profiling restricted. Profiling may be used to analyse or predict economic situations, health, personal preferences, interests, reliability, behaviour, location, or movements

- **Your right to data portability**

You have the right to request that information we process by automated means is sent to you or another nominated data controller in a commonly used electronically readable format

You are not required to pay any charge for exercising your rights. If you make a request, we will respond to you within one month.



If you wish to action any of the above, please contact our local representatives at Business Risk and Compliance Experts (BRACE) by:

- e-mailing aarna@brace-solutions.com
- Writing to Business Risk and Compliance Experts Ltd, Friargate Studios, Ford Street, Derby, DE1 1EE. United Kingdom.
- Telephoning them on +44 (0)1332 720 078.

Please do not include confidential information in e-mails or letters.

You can also complain to the ICO if you are unhappy with how we have used your data.

You can contact them in writing to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF or call their helpline on 0303 123 1113

Changes to this policy

We regularly review this policy. You may view the most recent version here on our website. Last updated November 2023