

# Greatly Nurtured Development – Privacy Policy

## Introduction and Summary

This Privacy and Cookie Policy explains what information we may collect about you, as well as how we collect, use, share, disclose or otherwise process that personal information.

We use your information to provide you with the products and services you request, as well as to understand how and why our audiences engage with us. This allows us to personalise content, show you relevant adverts that supports our journalism, and generally improve your experience of our products and services.

We encourage you to read this Policy in full. It covers a lot of information that is important.

## Our Privacy Promise

Your data protection rights are important. We're committed to being clear with you about how we use your information.

We promise that we will:

- be clear and upfront about how your information is used by us
- carefully determine the legal reason for using your data and where necessary ask your permission first
- only hold on to your information for as long as there is a business need to keep it
- put in place strong controls to protect your information
- choose suppliers that share the same strong data protection values as us

## About Us

Greatly Nurtured Development Group Limited will collect, use, share and disclose or otherwise process your personal information in line with this Policy.

## Collection of your information

### Registration, forums, apps and your dealings with us

We collect information about you when you provide it to us. For example, when you fill out our online forms, subscribe to one of our titles, enter a competition run by us, respond to our promotions, register and use one of our apps, enquire about our products and services or participate in a reader forum or poll (which could be on any medium).

### Information from devices

We also collect information when you interact with our websites or use our apps. This can include information about your device, including its Advertising ID (e.g. Google's Advertiser Identification or Apple's Identifier for Advertisers) and general geographic location. This can be to provide services that have copyright restrictions, to deliver news that is relevant to where you are, tailor advertising to your interests and provide a better experience. With your consent, we may also collect the specific location of your device or request access to data from other applications to provide certain services you have requested.

### Social login

If you log in to our websites or online services via a third-party site, such as Facebook, that site may pass information to us, such as user ID, name associated with the ID, email address and location, plus other information permitted under the privacy policy for that website. Our websites and apps may also return information about you to that social networking site regarding your log in. If you log in with or connect to your account using social media (Facebook, Twitter, etc), the social media service's use of the shared information will be governed by their privacy policy. If you do not want your personal information shared in this way, please do not connect your social media service

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account with your Greatly Nurtured Development account, and do not participate in social sharing on our websites or apps.

## **Posts, comments and interaction**

If you correspond with any of our titles or interact with other customers or audience members or our staff, for example by using polls, comments, text messages, video, email, phone, radio or by post, we may display this content indefinitely in any relevant context, subject to our editorial judgement and your rights as set out in this Policy. This may be anonymised in the case of testimonials or customer service conversations. If you take part in any reader or listener forums or send us letters for publication, then you may be identifiable to others publicly and your comments attributed to you.

## **Public information and posts**

Any information about yourself or others that you post on our social media pages, on platforms like Twitter, Facebook and other chat rooms, blogs and forums, will be viewed by others (including search engines), over whom we have no control. You are responsible for the information you choose to post or otherwise make available in public areas, and you acknowledge that this may be collected and used by third parties.

## **Our legal bases for using personal information**

### **With your consent**

There may be some uses of your information where we need to ask for your consent. You will have the right to withdraw that consent at any time, however, if you withdraw consent, we may not be able to provide the product or service you have requested.

### **Fulfilling a contract**

We process your personal information in order to fulfil a contract we have with you. For example, we would use your information to provide you with access to your digital subscription or other products you have signed up for or to provide a prize to which you are entitled.

### **For a legitimate interest**

We may use your information where there is a legitimate reason to do so. For example, we may use your information where it would help achieve our business objectives or to facilitate a benefit to you or someone else. We only rely on legitimate interests if the reason for using your information is fair and lawful. Where we want to rely on legitimate interests as a legal basis, we will carry out a balancing test between our legitimate interests and your privacy rights. Our legitimate interests in processing personal data include:

- to support individual and societal rights to receive information;
- to develop, deliver and maintain relevant and engaging products services and advertising;
- understanding when our audiences engage with us or other organisations;
- to build a clearer understanding of who our audiences are in order to better serve them;
- to carry on the business of a commercial organisation; and
- to demonstrate that we provide services and products to agreed industry standards.

### **To comply with legal obligations and protect our rights**

There may be situations where we need to use your information to comply with legal and regulatory obligations or defend claims. This may include publishing information about prize winners, for example.

### **Other considerations**

The specific legal basis we use will depend on the activity the information is used for. Please keep in mind that while we will rely on one legal basis, if that is no longer available to us, we may be able to

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rely on another. We will indicate what legal basis we rely on to use your information for that purpose.

## **How we use personal information**

### **To provide products and services and improve your experience**

We will use your information to provide you with products and services you have asked for, and to manage our relationship with you, including allowing you to interact, comment, and participate in online games, contests and reward programmes. We may use your information to monitor, improve and protect our products, content, services and websites, both online and offline. We may also provide you with help and support where we believe it is required. For example, if you have provided your contact information, we may contact you when a checkout journey is not completed. We never record phone calls or customer enquiries via online chat for quality, training and management purposes.

### **To personalise your experience**

#### **Personalising content and offers**

We sometimes make assumptions about your interests based on the way you interact with our products and services and the information we hold about you. Knowing these preferences also allows us to understand the products, content and services our customers like, letting us focus our efforts on developing those areas. We may also use this information to make decisions about what direct marketing and advertising to show you. We will use your information to optimise article and content recommendations. Based on the kind of articles and content which prove to be of interest, we will use this information to provide a more engaging and personalised experience for you.

### **To build direct marketing campaigns and deliver direct marketing communications to your devices**

We use the information we collect from you and other sources to create engaging and relevant marketing campaigns promoting products and services we think you'll like from our brands and partners. The use of your information to do this is usually based on a legitimate interest, however, we will ask your permission if we want to deliver direct marketing to you. You will be able to change your marketing preferences in your Preference Centre. We may send you direct marketing communications via post, telephone, email, SMS, social media, online or in-app if we hold a valid direct marketing permission for you and you are engaged with our products and services.

## **Consent, legitimate interests**

### **To send you product-related and similar product and services communications**

We may use your information to send you relevant updates and information about the products and services you engage with. These 'in-life' communications are intended to allow you to get the most out of the products you use, and are considered to form part of the products and services we provide. You can control these in your Preference Centre. In addition, we may send you information about similar products and services from our brands, where you told us that you are happy to receive that information.

## **Legitimate interests, performance of a contract**

### **To conduct market research and perform analytics**

Generally, research and analytics are used to inform strategic decisions and give us a better understanding about our audiences. When you engage with our products and services, we may rely on a legitimate interest to contact you about your experience. You will be able to opt out of these communications. In addition, we may use the information we hold on you about your engagement with our products and services, as well as other information collected from partners and other sources, to understand how our products are used and make improvements or develop other

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products and services our audiences may like. We may also conduct analysis and perform analytics to help us better understand how you engage with the advertising you are shown.

## **Legitimate interest**

### **To provide co-branded services and features**

We may offer co-branded services or features, such as competitions or other promotions, together with a third party and may share the information you provide to us with that third party. These co-branded services may be hosted by us or by the third party. It will usually be obvious where this is the case and will provide you with additional information where required. Please remember that where we share your information with these third parties, that they will use your information in accordance with their privacy policy.

## **Legitimate interests, consent, performance of a contract**

### **To disclose your information as permitted or required by law**

Your personal information will be disclosed where we are obliged by law to do so. We may also disclose your information where we are allowed to by law to protect or enforce our rights or the rights of others and for the prevention and detection of crime, such as fraud.

## **Legitimate interests, legal obligation**

### **To ensure our services are used appropriately**

If you post or send offensive or objectionable content anywhere on or to our websites or apps, or otherwise engage in any disruptive behaviour on any of our platforms, we may use the information that is available to us about you to stop such behaviour. This may involve informing relevant third parties, including your employer, law enforcement or other competent authorities about the content and your behaviour.

## **Legitimate interest**

### **Transfer as part of the sale of our business**

If we sell all or part of our business, customer information may be one of the transferred business assets. If this happens, your information will be disclosed to any successors of our business for them to use for the purposes set out in this Policy.

## **Legitimate interest**

### **To take payments, check your identity and conduct credit checks**

Information that we hold about you and that you provide to us may be used to take payment for products and services. It may also be used to verify credit details related to payments. Payment details may be retained in order to speed up the renewal process for products and services. If you apply for credit, then in order to help us make credit decisions about you, prevent fraud, check your identity, and prevent money laundering, we may check with credit reference agencies who will record any credit searches on your credit file. We may also disclose details of how you conduct your account with us to these credit reference agencies for related purposes. We may use your information to check your identity in relation to requests you make. If you use third party payment providers, such as PayPal, to pay for or receive payment from us that site may pass information to us including your name, email address, billing or other address, phone number (if applicable), date of sign-up, the number of payments you have received from verified PayPal users, whether you have been verified to have control of a bank account and any other information you agree they can share.

## **Legitimate interests, consent, legal obligation, performance of a contract**

### **To facilitate posts, commenting and interaction**

If you correspond with any of our titles or interact with other customers or audience members or our staff, for example by using polls, comments, text messages, video, email, phone, or by post, we

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may display this content indefinitely in any relevant context, subject to our editorial judgement and your rights as set out in this Policy. This may be anonymised in the case of testimonials or customer service conversations. If you take part in any reader or listener forums then you may be identifiable to others publicly and your comments attributed to you.

## **Consent, legitimate interest, performance of a contract**

### **Public information and posts**

Any information about yourself or others that you post on our social media pages, on platforms like Twitter, Facebook and other chat rooms, blogs and forums, will be viewed by others (including search engines), over whom we have no control. You are responsible for the information you choose to post or otherwise make available in public areas, and you acknowledge that this may be collected and used by third parties.

## **Consent, legitimate interest**

### **How We Share Your Information**

#### **Sale of our business**

If we sell part or all of our business, customer information may be one of the transferred business assets. If this happens, your information may be disclosed to any successors of our business for them to use for the purpose set out in this Policy.

## **Controlling your information**

### **Updating your information**

Please ensure you update your personal information or tell us if it changes or is inaccurate. You can update your details, for example your email address, in your account settings or an equivalent section if you are a subscriber. You may also email our Customer Services team at [info@gndsportshub.com](mailto:info@gndsportshub.com).

## **Controlling direct marketing and other communications**

You can change your mind about receiving direct marketing or other communications you receive from us, such as bulletins and other information about your chosen products and services by contacting us using the details below.

## **Withdrawing consent for processing**

Where we may rely on your consent to process personal information, you have the right to withdraw that consent at any time. In some instances, we may have an alternative legal basis to continue to process that personal information and we will inform you of that. If you do withdraw consent, we may not be able to provide the product or service you have requested.

## **Other rights**

You may request a copy of your personal information from Greatly Nurtured Development which may hold personal information about you. You can also ask us to correct any inaccuracies in your personal information. You may also have the right to object, erase, or restrict our processing of your information – for example, where we process personal data because this is in our legitimate interests, you may object to this. We will need to carefully consider your request, as there may be circumstances which require us, or allow us to continue processing your data. To exercise any of these rights, please contact us at [info@gndsportshub.com](mailto:info@gndsportshub.com). These rights may be restricted by law, for example we may not be able to provide a copy of your data where the data we hold is also the data of a third party and it is not reasonable to disclose this information.

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## **Retention of personal information**

We will retain your information for as long as necessary for the uses set out in this Policy, or while there is a legitimate reason for doing so. If you ask us to delete your information before that time, we may not be able to do so due to legal, regulatory or contractual constraints. For example, we would need to retain your name and contact details for suppression purposes if you do not want to receive direct marketing from us. If you ask for your account to be closed, we will do this as soon as is reasonably possible subject to any applicable terms and conditions relating to the account. Personal information from closed accounts is retained in order to comply with legal obligations, prevent fraud, collect any fees owed and to resolve disputes.

## **Changes to Policy**

From time to time, we make changes to this Policy. This may be in relation to changes in the law, best practice, changes in our services or treatment of your personal information. Where necessary, we will notify you of these changes. We will always display clearly when the privacy policy was last amended on the website. Our policies at GND are our principles, rules, and guidelines legally formulated and adopted to reach our long-term goals. In addition to any policy enquiries you may have, you can use these details to contact our GDPR Officer:

Post:

Office 261

321-323 High Road

Chadwell Heath

RM6 6AX

Email: [info@gndsportshub.com](mailto:info@gndsportshub.com)