

# **Privacy Policy**

## **Introduction**

We have produced this Privacy Policy because we recognize the value of all personal information we may collect and process in the course of our business operations and we are fully committed to operating in line with the requirements of the EU GDPR, the UK Data Protection Act 2018 and other legislation governing the handling of Personally Identifiable Information (PII).

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### **1. Who We Are**

We are Planet Enterprises Ltd., a private limited company registered in the UK (company registration number 03080901). The registered office is at The Old School, 690 Bradford Road, Birkenshaw, Bradford, West Yorkshire, BD11 2DR and we are registered with the Information Commissioner's Office Register of Data Controllers under registration number Z7192614.

### **2. Personal Information We Collect**

We may collect personal information about you as part of the process of you becoming a customer, using our websites, making a sales or support enquiry and registering for or attending events such as webinars and trade exhibitions.

Data collected may include contact information such as name, address, title, company name, job title, email address, telephone number and payment details.

Payment details will only be personally identifiable if these relate to an individual natural person e.g. personal bank account number and sort code, rather than to an organization (legal person).

We do not retain any payment card details and are certified as PCI compliant.

We may collect certain information or data about you when you use any of our websites. Our active company websites are currently 'planetestream.co.uk' or 'media-pod.co.uk'

Information collected includes:

- Questions, queries or feedback you leave, including your email address if you send an email to 'planetestream.co.uk' or 'media-pod.co.uk'

- Your IP address and details of which version of web browser you used and information on how you used the site, using cookies and page tagging techniques to help us improve the website
- Details to allow you to access our services, product information and transactions, e.g. an email address

### 3. How we use Personal Information

This personal information collected may be used in conjunction with our business activities and processed with regard to lawful bases as indicated below:

<b>Purpose</b>	<b>Lawful basis for Processing</b>
Creation and maintenance of your business account <i>To enable efficient and professional business activities</i>	Legitimate Interest
Processing of orders	Contractual
Notification of your order status <i>To keep you informed regarding our service provision to you</i>	Legitimate Interest
Replying to your e-mails <i>To enable communications for business purposes</i>	Legitimate Interest / Consent
Provide technical support	Contractual / Consent
Provide warranty services	Contractual / Consent
Marketing Communications <i>To keep you informed of availability of relevant products and services</i>	Legitimate Interest / Consent

Information collected from our websites may be specifically used to:

- Improve the site by monitoring how you use it
- Respond to any registrations you send us, if you have asked us to
- Provide you with information about our products and services or relevant information if you have booked a place for a tutorial webinar, web meeting or similar event

We cannot personally identify you when you access our websites, only when you submit your data for a particular purpose, such as in the data collection examples in section 2.

Please note that after submitting your information via 'planetestream.co.uk' or 'media-pod.co.uk', your email address may be used to provide you with relevant information such as newsletters, special offers, free training opportunities and events. You may opt to unsubscribe at any time via the unsubscribe link contained within every email broadcast we issue.

### 4. Storage and Security of Personal Information

We store your data on our secure servers located in the UK and the EU. Customer details are securely stored on-premises in the Sage 200 and CRM software application environments. Our 'planetestream.co.uk' and 'media-pod.co.uk' websites are hosted on Microsoft Azure infrastructure

located in North or West Europe. We keep your personal information secure by applying appropriate technical and organisational practices against unauthorised or unlawful processing and against accidental loss, destruction or damage. Whilst we do our best to protect your personal information at all times, and make extensive use of encryption and other available technologies, we cannot guarantee the security of your data which is transmitted to our website, applications or services via an internet or similar connection.

Personal information used in our email broadcasts is also stored by our Email Marketing Service Provider (EMS) which is Campaign Monitor, whose policies regarding data security and best practices can be viewed at <https://www.campaignmonitor.com/trust>

Campaign Monitor stores personal data relating to our email broadcasts on their secure servers based in the USA and we have a signed Data Protection agreement in place with them to ensure GDPR compliance.

## **5. Cookies and Analytics**

When using the 'planetestream.co.uk' or 'media-pod.co.uk' websites, we may collect information about your computer, including your IP address, operating system and browser type, for system administration and in order to create reports. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

The only cookies in use on these websites are for Google Analytics. Google Analytics is a web analytics tool that helps website owners understand how visitors engage with their website. Google Analytics customers can view a variety of reports about how visitors interact with their website so that they can improve it. Like many services, Google Analytics uses first-party cookies to track visitor interactions, as in our case, where they are used to collect information about how visitors use our site. We then use the information to compile reports and to help us improve our site.

Cookies contain information that is transferred to your computer's hard drive. These cookies are used to store information, such as the time that the current visit occurred, whether the visitor has been to the site before and what site referred the visitor to the web page.

Google Analytics collects information anonymously. It reports website trends without identifying individual visitors. You can opt out of Google Analytics without affecting how you visit our site – for more information on opting out of being tracked by Google Analytics across all websites you use, please visit <https://tools.google.com/dlpage/gaoptout> For instructions on how to disable cookies, please visit <https://www.computerhope.com/issues/ch000509.htm>

Email marketing messages that we send may contain tracking beacons / tracked clickable links or similar server technologies in order to track subscriber activity within email marketing messages. Where used, such marketing messages may record a range of data such as; times, dates, IP addresses, opens, clicks, forwards, geographic and demographic data. Such data, within its limitations, will show the activity each subscriber made for that email campaign.

## **6. Marketing**

Any email marketing messages we send are in accordance with the GDPR and the PECR. We provide you with an easy method to withdraw your consent (unsubscribe) or manage your preferences and the information we hold about you at any time.

We may also contact you by telephone to communicate relevant information relating to our products and services on a business to business basis. In these cases we act in accordance with the PECR and with Telephone Preference Service (TPS/CTPS) registrations and again you can always easily unsubscribe from these communications if you desire.

## **7. Third Parties**

We do not share your information with any other organisations for marketing, market research or commercial purposes. As documented in section 4, the only third party service which makes use of your personal information is Campaign Monitor when acting on our behalf and under our instruction.

## **8. Disclosing your information**

We may be required to pass on your personal information if we have a legal obligation to do so.

## **9. Keeping your data**

We will retain your personal information for the duration of our business relationship and afterwards, for as long as is necessary and relevant for our legitimate business purposes, or to comply with applicable laws and regulations. Where your data is no longer required for these purposes, it will be removed from our CRM systems as part of our periodic review processes.

## **10. Your Individual Rights**

Under the GDPR your rights are as defined under the headings below. You can read more about your rights in detail here: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

- the right to be informed
- the right of access
- the right to rectification
- the right to erasure
- the right to restrict processing
- the right to data portability
- the right to object
- the right not to be subject to automated decision-making including profiling

If you have submitted personal information through any of our company websites 'planetestream.co.uk', 'media-pod.co.uk' or 'planetdv.net' and wish to make a 'Subject Access Request' or to pursue an action relating to any of these rights, please email us at [privacy@planetestream.co.uk](mailto:privacy@planetestream.co.uk) We handle requests in accordance with the GDPR and will endeavour to respond as swiftly and efficiently as possible.

You also have the right to raise concerns with ourselves or the ICO if you feel there is a problem with the way we are handling your data. Guidance on raising any concerns regarding the handling of your personal data can be viewed at <https://ico.org.uk/your-data-matters/raising-concerns/>

## **11. The Planet eStream Unified Video Platform (UVP) and Personal Information**

Planet eStream customers using our secure video platform software products may host this service themselves on their own infrastructure or utilise our cloud hosted software services. In either case, the customer is the data controller in respect of their user's personal information which may be submitted to the service. In these cases, we are data processors acting on the data controller's behalf and under the controller's written instruction. How personal information submitted to each Planet eStream UVP site is handled, is documented at <https://www.planetestream.co.uk/gdpr> in a GDPR whitepaper and a GDPR Data Processing Addendum, along with our DfE Cloud Software Services for Schools Supplier self-certification statement.

In all cases, the customer is responsible for maintaining the privacy of the personal information of its authorised users, in its capacity as data controller for this information. It is the customer's responsibility to ensure that the relevant lawful bases are established for their own organisation to process this personal information and to be able to engage data processors such as ourselves to process this data on their behalf.

As an authorised user of a Planet eStream UVP service provision, you should address any queries and requests in respect of the handling of your personal information when you use this service, directly to the organisation providing the service to you (our customer). Any queries and requests received by ourselves in this regard will be forwarded to our relevant customer who is acting as the data controller for your information.

### **Data Sharing**

None of the personal information submitted to Planet eStream UVP instances is shared with third parties or used by ourselves for marketing, market research or other commercial purposes.

### **Cookies**

Planet eStream UVP websites make use of cookies is described here:

#### Temporary Cookies

- Each time that you log-on to the website, a temporary cookie is created to store your Planet eStream user permissions and settings. The temporary cookie (also known as a 'session cookie') is not stored on your device, and only exists until your web-browser is closed after visiting the Planet eStream website
- When you search or navigate around a Planet eStream website, your temporary cookie is checked and the search results and options available to you are tailored to match your permissions and settings
- Planet eStream cookies do not contain personal information and cannot be used to identify you. Cookies set by a Planet eStream website cannot be accessed by any other website
- If cookies are not enabled in your web-browser, the website will not be able to ascertain your permissions and settings; it will assume that you have none, and you may be unable to log-in
- If you would like to disable cookies within your web-browser then please visit <https://www.computerhope.com/issues/ch000509.htm> for instructions on how this can be achieved, or check your web-browser's help documentation

### Permanent Cookies

- A Planet eStream website allows you to resume playback of a video that you have previously started watching. The information used to provide this functionality is stored in a permanent cookie (also known as a 'persistent cookie')
- Planet eStream cookies do not contain personal information and cannot be used to identify you. Cookies set by a Planet eStream website cannot be accessed by any other website
- If cookies are not enabled in your web-browser, we will not be able to store video resume data and the feature will be unavailable
- A Planet eStream website may also be configured to issue a permanent cookie for use in obtaining usage statistics via services such as Google Analytics
- If you would like to disable cookies within your web-browser then please visit <https://www.computerhope.com/issues/ch000509.htm> for instructions on how this can be achieved, or check your web-browser's help documentation

### **12. The Media Pod Secure Media Library and Personal Information**

Customers using our Media Pod secure media library software products at Junior or Primary Schools utilise our cloud hosted software services. The customer is the data controller in respect of their user's personal information which may be submitted to the service and we are data processors acting on the data controller's behalf and under the controller's written instruction.

How personal information submitted to each Media Pod website is handled is covered by the documentation for our enterprise level Planet eStream UVP product (of which Media Pod is a derivative) at <https://www.planetestream.co.uk/gdpr> in a GDPR whitepaper and a GDPR Data Processing Addendum, along with our DfE Cloud Software Services for Schools Supplier self-certification statement.

In all cases, the customer is responsible for maintaining the privacy of the personal information of its authorised users, in its capacity as data controller for this information. It is the customer's responsibility to ensure that the relevant lawful bases are established for their own organisation to process this personal information and to be able to engage data processors such as ourselves to process this data on their behalf.

As an authorised user of a Media Pod service provision you should address any queries and requests, in respect of the handling of your personal information when you use this service, directly to the organisation providing the service to you (our customer). Any queries and requests received by ourselves in this regard will be forwarded to our relevant customer who is acting as the data controller for your information.

### **Data Sharing**

None of the personal information submitted to Media Pod instances is shared with third parties or used by ourselves for marketing, market research or other commercial purposes.

### **Cookies**

Media Pod websites make use of cookies is described here:

### Temporary Cookies

- Each time that you log-on to the website, a temporary cookie is created to store your Media Pod user permissions and settings. The temporary cookie (also known as a 'session cookie') is not stored on your device, and only exists until your web-browser is closed after visiting the Media Pod website
- When you search or navigate around a Media Pod website, your temporary cookie is checked and the search results and options available to you are tailored to match your permissions and settings
- Media Pod cookies do not contain personal information and cannot be used to identify you. Cookies set by a Media Pod website cannot be accessed by any other website
- If cookies are not enabled in your web-browser, the website will not be able to ascertain your permissions and settings, it will assume that you have none, and you may be unable to log-in
- If you would like to disable cookies within your web-browser then please visit <https://www.computerhope.com/issues/ch000509.htm> for instructions on how this can be achieved, or check your web-browser's help documentation

#### Permanent Cookies

- A Media Pod website allows you to resume playback of a video that you have previously started watching. The information used to provide this functionality is stored in a permanent cookie (also known as a 'persistent cookie')
- Media Pod cookies do not contain personal information and cannot be used to identify you. Cookies set by a Media Pod website cannot be accessed by any other website
- If cookies are not enabled in your web-browser, we will not be able to store video resume data and the feature will be unavailable
- A Media Pod website may also be configured to issue a permanent cookie for use in obtaining usage statistics via services such as Google Analytics
- If you would like to disable cookies within your web-browser then please visit <https://www.computerhope.com/issues/ch000509.htm> for instructions on how this can be achieved, or check your web-browser's help documentation

### **13. Contact Details**

If you have any further questions regarding our handling of your personal data or the contents of this Privacy Policy, you may contact us by email to [privacy@planetestream.co.uk](mailto:privacy@planetestream.co.uk) or by post to:

The Privacy Officer  
 Planet Enterprises Ltd  
 The Old School  
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