

Coalition on Secure Technology – The Cellular Module Threat (“the company”, “we”, “us”, or “our”) respects privacy and we are committed to protecting your personal data.

This privacy notice outlines our policies and procedures regarding personal data that we collect and process through or in connection with the use of our services, or in connection with the use of any websites or applications linking to this notice, including <https://cim-coalition.co.uk>. This Policy also sets out your rights in respect of our processing of your personal information.

In most cases, Coalition on Secure Technology – The Cellular Module Threat is the “controller” of your personal data, as defined by the General Data Protection Regulation (EU) 2016/679 which has been retained in the UK by virtue of the European Union (Withdrawal) Act 2018 (the “GDPR”). This means we determine the purposes and means of processing your personal data.

In some limited circumstances, we will process personal data as a “processor” on behalf of our clients who will be the “controller” of your personal data.

Our policies are based on industry best-practice, if you have any questions about our privacy policies please contact us via:

Email: contact@cim-coalition.co.uk

Legal basis for holding your data

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests
- Where you have consented to a certain use of your personal information, or
- Where we need to comply with a legal or regulatory obligation
- To the extent permitted under applicable laws, we will also process, transfer disclose, and preserve personal information when we have a good faith belief that doing so is necessary

In circumstances where we rely on consent, we will ask for your consent at the point of collection. Where we intend to further process your personal information, we may contact you to seek your consent for new purposes.

Where your personal information is completely anonymised, we do not require a legal basis to use it as the personal information will no longer constitute personal information that is regulated under data protection laws. However, our collection and use of such anonymised personal information may be subject to other laws where your consent is required.

Types of information we collect

Personal information is information that identifies you as an individual. Categories of personal information we collect includes:

- Contact information (name, physical address, telephone number, email address)
- Information about your interests or affiliations

- Information for hiring and human resources purposes (employment and education history, work eligibility status, date of birth, financial account information, government-issued identification information)
- Any additional information you submit to us

Methods of obtaining personal information

We may collect and receive your personal information using different methods:

- You may give us your personal information directly such as via an enquiry or via our website
- Personal information provided automatically when you access our website such as technical information about your equipment, browsing actions and patterns. We collect this personal information by using cookies and other similar technologies (see Cookie Policy section below).
- Personal information received from third parties. From time to time, we will receive personal information about you from third parties. Such third parties may include analytics providers, payment providers, and third parties that provide technical services to us so that we can operate our website and provide our services.
- Publicly available personal information. From time to time, we may collect personal information about you from publicly available sources or media reports or personal information about you that you or a third party may make publicly available to us (for example through speaking at events or publishing articles or other news stories).
- We reserve the right to supplement your personal information with information we gather from other publicly available sources which may include information we gather from online and offline sources.

How we use your personal information

We use your personal information to:

- Verify your identity
- Provide our services to clients
- Improve our products and services and develop and market new products and services
- Carry out requests made by you to us
- Comply with any applicable law, court order, other judicial process, or the requirements of a regulator
- Enforce our agreements with you
- Protect the rights, property or safety of us or third parties, including our other clients and users of the Site
- Provide support for the provision of our Services, and use as otherwise required or permitted by law
- Enable the company to monitor its inclusivity policies and employment practices

Use of personal information collected through our website

We use personal information collected through our website for the following purposes:

- Information we collect via contact forms enables us to respond to requests and administer client accounts.
- We collect information provided by potential employees including curriculum vitae containing contact information to enable us to review applications, respond to the applications, and hire staff.
- We use cookies and similar other technologies to collect information from the computer hardware and software you use to access the Site, or from your mobile.

The information you provide to us may be archived or stored periodically according to our standard backup processes and in line with legal requirements.

Other uses of personal information

We may also collect information in other contexts other than this site as described above. That information may be used in the manner described above and in other ways, such as:

We collect, and maintain data bases containing, information about journalists, talent, social media influencers, social media users and other professionals in the public relations, news or media industry collected by us. Such information may include an individual's name, business contact details, professional interests . This information may be information that is voluntarily supplied to us by those individuals through our site or in other situations (such as public speaking events), or information that is public or available in third party databases or via third party content platforms (including social media platforms). Further, we may collect and/or review other publicly available news stories and other journalistic content including content made available through public news sites and social media sites to understand what people are saying about us and our clients. We use this information to provide our services to our clients including ensuring we and our clients are fully up to speed on public opinion in any particular area and are fully briefed when it comes to dealing with the press and others.

We may carry out marketing activities using your personal information. We may send marketing information to you by mail or email. We may also provide you with information about media and public events. It may be necessary to mention the purpose of other marketing communications at the point that we collect that information.

If we have engaged you or the organisation you represent to provide us with products or services (for example, if you or the organisation you represent provide us with services such as IT support or financial advice), we will collect and process your personal information in order to manage our relationship with you or the organisation you represent, to receive products and services from you or the organisation you represent and, where relevant, to provide our Services to others.

We may use your personal information for the following business administration and legal compliance purposes:

- To comply with our legal obligations;
- To enforce our legal rights;
- To protect the rights of third parties; and
- In connection with a business transition such as a merger, reorganisation, acquisition by another company, or sale of all or a portion of our assets.

Use of data for marketing

We may use your personal information to form a view on what we think you may want or need, or what may be of interest to you. We may provide you with marketing information about our products and services we feel may interest you:

- If you have given your consent to receiving marketing material from us at the point we collected your information, where required by law
- Otherwise in our legitimate interests provided these interests do not override your right to object to such communications. In those cases, we believe that we have a legitimate interest in sending you marketing communications to provide you with the very best service we can and to optimise the benefits you receive from our business transactions with you
- We strive to provide you with opt out choices regarding your personal information uses, particularly around marketing and advertising
- We will get your express opt-in consent before we share your personal information with any third party

Collection of personal information of children

We do not knowingly or intentionally collect children's personal information and do not knowingly hold any children's personal information.

Confidentiality and information security

We are committed to keeping the personal information you provide to us secure, and we will take all reasonable precautions to protect your personal information from loss, misuse or alteration.

To safeguard against unauthorised access to personal information by third parties outside our organisation, all electronic personal information held by us is maintained on systems that are protected by up-to-date secure network architectures that contain firewalls and intrusion detection devices.

The data saved in servers is "backed up" (i.e. the data is recorded on separate media) to avoid the consequences of any inadvertent erasure, destruction or loss otherwise. The servers are stored in facilities with high security, access protected from unauthorised personnel, fire detection and response systems.

All of our employees who have access to, and are associated with the processing of personal information, are obliged to respect the confidentiality of the personal information of all users of our services.

Your rights

You have the right under certain circumstances:

- To see the personal information that we hold about you
- Request your data be corrected or erased where appropriate
- To restrict the processing of your personal information while we investigate your concern
- To object to your personal information being processed where we are relying on our or a third party's legitimate interest to do so or for the purpose of direct marketing

- To withdraw your consent at any time when processing relies upon consent
- Data subjects have the right to be provided with information as to the nature of the personal information we store or process about them, and to request deletion or amendments. These requests can be made verbally or in writing at our contact information provided
- If any information is inaccurate or incomplete, a data subject may request that data be amended
- If a data subject demonstrates that the purpose for which the data is being processed is no longer legal or appropriate, the data will be deleted, unless applicable law requires otherwise
- To exercise these rights, please contact us using the contact information provided

Your consent

Where our use of your personal information requires your consent, you can provide such consent:

- At the time we collect your personal information following the instructions provided
- By informing us by e-mail or phone using the contact details set out in this policy
- Please note that if you specifically consent to additional uses of your personal information, we may use your personal information in a manner consistent with that consent

Retention of personal information

We retain personal information only for as long as is necessary for the purposes described in this policy, after which it is deleted from our systems.

Regarding personal information we have processed, we may retain relevant personal information for up to three years from the date of our last interaction with the relevant individual and in compliance with our obligations under the EU General Data Protection Regulation (or similar legislation around the world). We may then destroy such files without further notice or liability.

If any personal information is only useful for a short period (e.g. for a specific event or marketing campaign or in relation to recruitment), we may delete it at the end of that period.

If you have opted out of receiving marketing communications from us, we will need to retain certain personal information on a suppression list indefinitely so that we know not to send you further marketing communications in the future.