

PRIVACY NOTICE

Omne Agency Ltd ("**Omne**") (we, us or our) respect your privacy and is committed to protecting your personal data. This privacy notice will provide you information about how we look after your personal data when you work with us, visit our website or visit a website we operate on behalf of our customers (regardless of where you visit it from), and tells you about your privacy rights and how the law protects you.

You will know that this privacy notice applies to personal data collected via a particular website as it will be made available on the relevant website.

This privacy notice aims to give you information on how we collect and process your personal data. Such collection and processing will be through your use of a relevant website, including any data you may provide through a website, when you contact us, when you purchase our services, where we are providing you with a service, or where you enter a competition we operate on behalf of our customers.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your personal data. This privacy notice supplements those other notices and is not intended to override them.

For the purpose of data protection laws in the UK, Omne is the data controller and is therefore responsible for your personal data.

1. The personal data we collect

Personal data means any information about an individual from which that person can be identified. What personal data we may collect, use, store and transfer depends on the circumstances in which we interact with you.

We have grouped the broad types of personal data that we may collect, use, store and transfer below and set out which circumstances in which such data may be relevant.

Where you are, or work for, a customer of ours:

- Identity Data, which includes first name and last name.
- Financial Data, which includes your payment details (including your billing address or bank details, as appropriate).
- Contact Data, which includes address (home, postal or other physical address), email address and telephone numbers.
- Transaction Data, which includes details about payments to and from you and other details of services you have purchased from us.

Where you access our main website (<https://omne.agency/>):

- Technical Data, which includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions,

operating system and platform and other technology on the devices you use to access our website.

- Usage Data, which includes information about how you use our website and services.

Where you access a website from which we are operating a competition on behalf of our customer, and where you enter that competition:

- Identity Data, which includes first name and last name.
- Contact Data, which includes address (home, postal or other physical address), email address and telephone numbers.
- Technical Data, which includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- Usage Data, which includes information about how you use our website and services.

Personal data does not include data where your identity has been removed or which not associated with or linked to your personal data (anonymous data).

Please note that where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services that you request). In this case, we may have to cancel a service you have requested but we will notify you if this is the case at the time.

2. How we collect personal data

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity and Contact Data by filling in forms, by corresponding with us by post, phone, email, via a relevant website or otherwise, or when you enter into a contract with us for the provision of our services.
- **Automated technologies or interactions.** As you interact with a relevant website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. Please see below for further information in regards to our use of cookies. We may also receive Technical Data about you if you visit other websites employing our cookies.
- **Third parties or publicly available sources.** We may receive personal data about you from third parties, such as analytics providers (we currently use Facebook and Google analytics).

3. The purposes for which we use personal data

We will only use your personal data when the law allows us to. We may collect and process the personal data about you for the following purposes:

Where you are, or work for, a customer of ours:

Omne

- **Provide and maintain our services** - we will use your Identity, Contact, Financial and Transaction Data in order to process and deliver services to you, including the management of payments, and to inform you of changes to our services.
- **Contacting us** - when you contact us with an enquiry or to request information, we will use your Identity and Contact Data to respond to you.
- **Advertising, marketing and public relations** - we may use the Identity, Contact, Technical, and/or Usage Data of our customers to form a view on what we think our customers may want or need, or what may be of interest to them and in doing so we will only send information that is deemed relevant to their use of our services.
- **Administration** - we may use your Identity, Contact and Technical Data for the purpose of protecting and operating our business, including customer support and/or hosting of data.

Where you are our customer, we process your personal data for the purposes of performing or entering a contract with you.

Where you are our customer or work for a customer, it is in our legitimate interests to process your personal data to run our business and provide services to you/your employer, keep our records updated and promote our business (for example in relation to marketing activities).

We may also have to process your personal data as it is necessary to comply with a legal obligation (for example, record keeping for tax and accounting purposes).

Where you access our main website (<https://omne.agency/>):

- **Administration** - we may use your Technical Data and Usage Data for the purpose of protecting our business and our website, including troubleshooting, data analysis, testing, system maintenance, reporting and hosting of data.
- **Website Analytics** - as you navigate our website, Technical and Usage Data may be collected automatically. We do this to find out things such as the number of visitors to the various parts of the website, and to help us to improve the content of the website and to customise the content or layout of the website for you, in accordance with our legitimate interests.

This is necessary for our legitimate interest. Where it is for administration, our interest is in running our business and for compliance with our legal obligations. Where it is for website analytics, our interest is in keeping our website updated and relevant, to develop our business and to inform our marketing strategy.

Where you access a website from which we are operating a competition on behalf of our customer, and where you enter that competition:

The specific personal data will depend on the precise scope and nature of the competition, and we will only collect this data directly from you for competitions we run so you will always be aware what of your data we process in this context.

For general information, we typically will only collect Identity and Contact may be collected for the purpose of running and administering the competition, contacting

participants and sending prizes to the winners. This is necessary for our legitimate interest in running such a competitions as part of our business and services to our customers.

Other circumstances:

We may also use personal data which you provide to us, where the law allows us to do so, where we need to comply with a legal or regulatory obligation, including the prevention of crime.

For clarity, where we rely on our legitimate interests to process personal data we do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4. Disclosure of personal data to third parties

Your personal data will only be disclosed to those of our employees or workers that have a need for such access for the purpose for which it was collected. Your personal data will not be disclosed to any other individuals or other entities except in the following circumstances:

- On occasion, we need to hire other companies to help us to serve you better or run the competition, and in some of these cases we may need to share personal data that is necessary for such third parties to perform tasks for us.
- Where it is necessary for the performance of our contract with you, including where you have asked us to do so or where we need to take steps to enforce any contract which may be entered into between us.
- Where we are under a legal duty to do so in order to comply with any legal obligation.
- In order to protect the rights, property or safety of our business, our employees and workers, customers, suppliers and others. This includes exchanging information with other companies and organisations for the purposes of fraud prevention and credit risk reduction.
- If we or substantially all of our assets are acquired by a third party, in which case personal data that we hold about our customers will be one of the transferred assets.

We require all third parties that process personal data on our behalf to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

5. Security

We are committed to ensuring that your personal data is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the personal data we collect. In addition, the access to and use of the personal data that we collect is restricted to our employees who need the personal data to perform a specific job role or activity. Where personal data is shared with third parties in line with this privacy notice responsible measures are used to protect your personal data.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access. We urge you to take every precaution to protect your personal data when you are on the internet.

6. International transfers

We do not typically transfer your personal data outside of the UK. If we need to do so for some reason, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.
- Where we use providers based in the US, we may transfer data to them if they are part of the agreed 'data bridge' which requires them to provide similar protection to personal data shared between the UK and the US.

Please contact us if you want further information on whether your personal data is transferred outside of the UK and the specific mechanism used by us when transferring your personal data out of the UK.

7. Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

8. Your rights

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data that we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data that we hold about you corrected, although we may need to verify the accuracy of the new personal data that you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your personal data unlawfully or where we are required to erase your personal data to comply with local law. Please note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your personal data which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent. You can ask us to stop sending you marketing messages at any time by following the “unsubscribe” (or similar) links on any marketing message sent to you or by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a purchase, product/service experience or other transactions.

If you wish to exercise any of your above rights, please contact us.

You will not have to pay a fee to access your personal data or to exercise any of your other rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

9. Other websites and links

Our relevant websites may contain links to other websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control third party websites and are not responsible for their privacy notices or for the content, accuracy or opinions expressed in such websites. We do not investigate, monitor or check third party websites for accuracy or completeness and the inclusion of any linked website on or through our website does not imply approval or endorsement by us of the linked website.

If you decide to leave any of our relevant websites and access these third party websites, plug-ins and/or applications you do so at your own risk. We encourage you to read the privacy notice of every website you visit.

10. Changes to this privacy notice

This version was last updated November 2023.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

11. Contact Details

If you have any questions about this privacy notice, please contact us:

By phone number: +44 (0)1525 840 830

By email address: hello@omne.agency

12. Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

COOKIE POLICY

Our relevant websites use only limited cookies to distinguish you from other users of our website and provide analytics data to us. This helps us to provide you with a good experience when you browse our websites and also allows us to improve our sites.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive. A cookie will typically contain a record of the website which issued it, its own name, and a value which is often a randomly generated unique number. A cookie will have a 'lifetime', which tells your browser when to delete it.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Cookie Types

Different cookies are used for different purposes. The most common ones are as follows:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

There are also several different types of cookie. These are the most common ones:

- **Session Cookies.** Session cookies only last for the duration of your website visit. A web browser normally deletes session cookies when it quits.
- **Secure cookies.** These cookies are only used when a browser is visiting a server via HTTPS, ensuring that the cookie is always encrypted when transmitting from client to server.

Cookies we use

The table below provides an overview of the cookies used on our main website (<https://omne.agency/>), including details of who sets each cookie, its purpose, when it expires, and, if relevant, how you can find out further information.

Cookie	Purpose	Duration
_hssrc	Analytical cookie – used for HubSpot to store a unique session ID.	Session only
_hstc	Analytical cookie – used for HubSpot to store time of visit	6 months
_fbp	Analytical cookie – placed by Facebook to store and track visits across our website.	6 months
_ga	Analytical cookie- used for Google analytics to distinguish one visitor from another	3 months
_gid	Analytical cookie- used for Google analytics to store and track a value for each page visited.	1 year
hubspotutk	Analytical cookie – used and track a visitor’s identity.	6 months
li_sugr	Advertisement cookie – used to collect user behaviour data to improve LinkedIn advertising	3 months
bcookie	Advertisement cookie – used by LinkedIn to recognise browser IDs.	1 year
lidc	Functional cookie - LinkedIn sets the lidc cookie to facilitate data center selection.	1 day
UserMatchHistory	Functional cookie – LinkedIn sets this cookie for LinkedIn Ads ID syncing.	1 month
AnalyticsSyncHistory	Analytics cookie – LinkedIn set this cookie to store information about the	1 month

	time a sync took place with the lms_analytics cookie.	
bscookie	Advertisement cookie – LinkedIn sets this cookie to store performed actions on the website.	1 year
li_gc	Functional cookie – LinkedIn set this cookie for storing visitor’s consent regarding using cookies for non-essential purposes.	6 months
__cf_bm	Necessary – This cookie, set by Cloudflare, is used to support Cloudflare Bot Management.	1 hour
_cfuvid	Necessary – used by Cloudflare to apply rate limits to traffic where multiple unique visitors share the same IP address.	Session

The table below provides an overview of the cookies used on websites we operate to run competitions, including details of who sets each cookie, its purpose, when it expires, and, if relevant, how you can find out further information.

Cookie	Purpose	Duration
AWSELB	Necessary - Associated with Amazon Web Services and created by Elastic Load Balancing, AWSELB cookie is used to manage sticky sessions across production servers.	15 minutes
AWSELBCORS	Performance – This cookie is used by Elastic Load Balancing from Amazon Web Services to effectively balance load on the servers.	15 minutes
OptanonConsent	Necessary – OneTrust sets this cookie to store details about the site’s cookie category and check whether visitors have given or withdrawn consent from the use of each category.	1 year
__lc_cid	Functional - this is an essential cookie for the website live chat box to function properly.	1 year, 1 month, 4 days
__lc_cst	Functional - this is an essential cookie for the website live chat box to function properly.	1 year, 1 month, 4 days
__oauth_redirect_detector	Functional – This cookie is used to recognize the visitors using live chat at different times in order to optimize the chat-box functionality.	1 minute
ARRAffinity	Necessary – ARRAffinity cookie is set by Azure app service, and allows the service to choose the right instance established by a user to deliver	Session

	subsequent requests made by that user.	
ARRAffinitySameSite	Necessary – This cookie is set by Windows Azure cloud, and is used for load balancing to make sure the visitor page requests are routed to the same server in any browsing session.	Session
EpiStateMarker	Functional - Indicates how session based information on the visit should be stored, using sessions or cookies.	Session
.EPiForm_BID	Functional – This cookie is for distinguishing one browser from other browsers that a visitor is using while surfing the internet. If a user visits an Optimizely site for the first time, Optimizely Forms automatically assigns a random GUID to the visitor’s browser. The GUID is stored in a cookie and when it has expired, Optimizely Forms creates a new one the next time the user visits the website.	3 months
ai_user	Advertisement – Microsoft Azure sets this cookie as a unique user identifier cookie, enabling counting of the number of users accessing the application over time.	1 year
ai_session	Analytics – This is a unique anonymous session identifier cookie set by Microsoft Application Insights software to gather statistical usage and telemetry data for apps built on the Azure cloud platform.	1 hour
_GRECAPTCHA	Necessary – Google Recaptcha service sets this cookie to identify bots to protect the website against malicious spam attacks.	6 months
__cf_bm	Necessary – This cookie, set by Cloudflare, is used to support Cloudflare Bot Management.	1 hour
pageUrl	Analytics – Allows for page views to be tracked.	1 year, 1 month, 4 days
_gcl_au	Analytics – Google Tag Manager sets the cookie to experiment advertisement efficiency of websites using their services.	3 months
test_cookie	Advertisement – doubleclick.net sets this cookie to determine if the user’s browser supports cookies.	15 minutes
_ttp	Advertisement – TikTok set this cookie to track and improve the	1 year, 24 days

	performance of advertising campaigns, as well as to personalise the user experience.	
ga*	Analytics – Google Analytics sets this cookie to store and count page views.	1 year, 1 month, 4 days
_ga	Analytics – Google Analytics sets this cookie to calculate visitor, session and campaign data and track site usage for the site’s analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognise unique visitors.	1 year, 1 month, 4 days
_gid	Analytics – Google Analytics sets this cookie to store information on how visitors use a website while also creating an analytics report of the website’s performance. Some of the collected data includes the number of visitors, their source, and the pages they visit anonymously.	1 day
_gat_UA-*	Analytics – Google Analytics sets this cookie for user behaviour tracking.	1 minute
cookie_consent_level	Necessary – This cookie is used for storing the visitor preference for the cookies in the information notice.	2 months, 1 day
_fbp	Analytics – Facebook sets this cookie to display advertisements when either on Facebook or on a digital platform powered by Facebook advertising after visiting the website.	3 months
li_sugr	Advertisement – LinkedIn sets this cookie to collect user behaviour data to optimise the website and make advertisements on the website more relevant.	3 months
bcookie	Advertisement – LinkedIn sets this cookie from LinkedIn share buttons and ad tags to recognize browser IDs.	1 year
lidc	Functional – LinkedIn sets the lidc cookie to facilitate data center selection.	1 day
UserMatchHistory	Functional – LinkedIn sets this cookie for LinkedIn Ads ID syncing.	1 month
AnalyticsSyncHistory	Analytics – LinkedIn set this cookie to store information about the time a sync took place with the lms_analytics cookie.	1 month
bscookie	Advertisement – LinkedIn sets this cookie to store performed actions on the website.	1 year

li_gc	Functional – LinkedIn set this cookie for storing visitor’s consent regarding using cookies for non-essential purposes.	6 months
_hjTLDDTest	Analytics – To determine the most generic cookie path that has to be used instead of the page hostname, Hotjar sets the _hjTLDDTest cookie to store different URL substring alternatives until it fails.	Session
_hjFirstSeen	Analytics – Hotjar sets this cookie to identify a new user’s first session. It stores the true/false value, indicating whether it was the first time Hotjar saw this user.	1 hour
_hjIncludedInSessionSample_3495546	Functional - Set to determine if a user is included in the data sampling defined by your site's daily session limit.	1 hour
hjSession*	Analytics – Hotjar sets this cookie to ensure data from subsequent visits to the same site is attributed to the same user ID, which persists in the Hotjar User ID, which is unique to that site.	1 hour
hjSessionUser*	Analytics – Hotjar sets this cookie to ensure data from subsequent visits to the same site is attributed to the same user ID, which persists in the Hotjar User ID, which is unique to that site.	1 year
_hjAbsoluteSessionInProgress	Functional – Hotjar sets this cookie to detect a user’s first pageview session, which is a True/False flag set by the cookie.	1 hour
_tt_enable_cookie	Advertisement – Tiktok set this cookie to collect data about behaviour and activities on the website and to measure the effectiveness of the advertising.	1 year, 24 days
aka_debug	Functional – Vimeo sets this cookie which is essential for the website to play video functionality.	Session
_hjRecordingEnabled	Analytics – Hotjar sets this cookie when a Recording starts and is read when the recording module is initialized, to see if the user is already in a recording in a particular session.	Session
pardot	Analytics – The pardot cookie is set while the visitor is logged in as a Pardot user. The cookie indicates an	Session

	active session and is not used for tracking.	
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Please note that the some third parties may also use cookies, over which we have no control. These named third parties may include, for example, advertising networks and providers of external services like web traffic analysis services. These cookies are likely to be analytical/performance cookies or targeting cookies.

Declining Cookies – Your Choice

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer and you can also view and/or delete cookies already on your computer although this will depend on the particular web browser that you use.

Please note that some cookies can be essential to the effective functioning of some of the services we offer online. If you disable cookies, a number of important functions and services will be unavailable to you and our websites may not operate correctly in your browser.