



Privacy and cookies

Spoke Conversation Limited trading as Spoke is committed to protecting and respecting your privacy.

This privacy policy sets out the basis on which any personal data we collect from you, or that you provide to us.

1. Introduction

1. Spoke Conversation Limited trading as Spoke (“Group”/“We”) is committed to protecting and respecting your privacy. This privacy policy (together with our Website Terms of Use, Data Protection Policy, Cookie Policy and any other documents referred to herein) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us (“Privacy Policy”). Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

2. For the purpose of the Data Protection Act 1998 (“Act”), the data controller is Spoke Conversation Limited.

2. Information we may collect from you

2.1 We may collect and process the following data about you:

- information that you provide by filling in forms on our site <https://www.wearespoke.co.uk> and any sub-domains (“Website”). This includes information provided at the time of registering to use our Website, subscribing to our service, posting material or requesting further services. We may also ask you for information when you report a problem with our Website;
- if you contact us, we may keep a record of that correspondence;
- we may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them;
- details of transactions (for goods, services or information) you carry out through our Website and the fulfilment of your orders;



- details of your visits to our Website including, but not limited to, traffic data, location data, weblogs and other communication data and the resources that you access;
- information you provide to us as part of our “Know Your Client” processes when we take you on as a customer; and
- information that you provide upon registration when attending our offices including, but not limited to, your photograph, driving licence details and contact telephone number.

3. IP addresses and cookies

3.1 When you access our Website, we may collect information about your computer including, where available, your IP address, operating system and browser type for system administration and to report aggregate information to our advertisers. This is statistical data about our Website users’ browsing actions and patterns and does not identify any individual.

3.2 For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer’s hard drive. They help us to improve our Website and to deliver a better and more personalised service. They enable us to:

- estimate our audience size and Website usage patterns;
- store information about your preferences and so allow us to customise our Website according to your individual interests;
- speed up your searches; and
- recognise you when you return to our Website.

3.3 You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our Website.



4. Where we store your personal data

4.1 The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data to us, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

4.2 All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

4.3 Unfortunately, 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 information, we will use strict procedures and security features to try to prevent unauthorised access.

5. Uses made of the information

5.1 We use information held about you in the following ways:

- to ensure that content from our Website is presented in the most effective manner for you and for your computer;
- to provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;
- to carry out our obligations arising from any contracts entered into between you and us including, but not limited to, ensuring the security of our premises;
- to allow you to participate in interactive features of our service, when you choose to do so;
- to notify you about changes to our services;



- to provide you with information about goods and services which may be of interest to you and we may contact you about these by post, telephone or electronic means (email or SMS);
- if you are an existing customer we will only contact you by electronic means (email or SMS) with information about goods and services similar to those which were the subject of a previous sale to you; and
- if you are a new customer we will contact you by electronic means only if you have consented to this.

5.2 If you do not want us to use your data in this way, please tick the relevant box situated on the form on which we collect your data or notify us in writing at hello@wearespoke.co.uk.

5.3 We do not disclose information about identifiable individuals to our advertisers but we may provide them with aggregated information about our Website users (for example, we may inform them that 200 women aged under 40 have clicked on their advertisement on any given day). We may also use such aggregated information to help advertisers reach the kind of audience they want to target (for example, men in NW3). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to target a particular audience.

6. Disclosure of your information

6.1 We may disclose your personal information to any member of our Group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006.

We may disclose your personal information to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- in the event that all of our or substantially all of our assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets; and



- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, enforce or apply our Website terms of use or other agreements, or to protect the rights, property or safety of the Group, our customers or others.

7. Your rights

7.1 You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your personal data) if we intend to use your personal data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your personal data. You can also exercise the right at any time by contacting us at hello@wearespoke.co.uk. Our Website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for such websites or policies. Please check these policies before you submit any personal data to these websites.

8. Access to information

8.1 The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10.00 to meet our administrative costs in providing you with details of the information we hold about you.

9. Changes to our Privacy Policy

9.1 This Privacy Policy will be reviewed periodically to take account of changes in the law and further guidance issued by the Information Commissioner.

10. Contact

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to hello@wearespoke.co.uk.



Cookie policy

A cookie is a small data file made up of letters and numbers which is placed by a website on the device you use to access the internet. Cookies serve different purposes. We use cookies to help us to improve our site and to provide us with information about usage of the Website. Certain third parties also place cookies on your device when you browse our Website.

Most web browsers allow you to have some control over the placing of cookies on your device through your browser settings. To find out more about cookies, including how to see what cookies have been set and how to block, manage and delete them, please visit <http://www.allaboutcookies.org/manage-cookies/>.

Unless you have adjusted your browser settings so that it will refuse cookies, our system may place cookies on your device as soon you visit any page on our Website.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Disable non-essential Cookies

Cookie Name	Nature of Cookie	Purpose
nocookies	Compliance Cookie	This cookie remembers whether you have accepted or rejected cookies.
has_js	Functional Cookie	This cookie helps the content management system to quickly determine if you are running Javascript for any progress bar updates.
SESS	Functional Cookie	This cookie is used to identify if you have logged in to the website, and also to store 'My Production' choices.
mt_device	Functional Cookie	This cookie is required to store your preference of mobile or desktop version of the site.
_utm _utma _utmc _utmz	Analytics Cookie	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. Further information about these cookies here.
PREF NIF	Third-Party Cookie	These cookies are used by Google to identify visitors using the Google +1 service.
NID	Cookie	