



Originator: DPO
Reviewer: A. Butcher
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Privacy Policy

Twin recognises that your privacy is very important, and we take it seriously. This privacy policy ("Privacy Policy") describes our policies and procedures regarding the collection, use, disclosure, and sharing of your personal information or personal data when you do business with our company.

Twin Group Limited is the data controller for your personal information collected and stored in Twin systems. This Privacy Policy applies to activities by Twin and its affiliates and subsidiaries (collectively "Twin" "we" or "us"). For clarity, personal information or personal data means information relating to an identified or identifiable natural person.

The Information We Collect

We collect information directly from individuals, from third-parties including conferences, shows and exhibitions and automatically through Twin and affiliate websites, or third parties that we use to generate actual and potential customer interest in our products and services. If you choose not to disclose certain personal information, for example various types of contact details, this may limit our ability to contact you on relevant business matters

Account and Profile Information

When you either make a website enquiry or booking, or apply to be an agent via our Agent Zone, we collect your name, contact information and in some cases information about product/service topics of interest to you. None of this information is made public and our information collection technologies are secure.

Communications

When you communicate with us (via email, phone, through Social Media or otherwise), we may maintain a record of your communication.

Automatically Collected Information About Your Activity

We use cookies, log files, pixel tags, local storage objects, and other tracking technologies to automatically collect information about your activities, such as your searches, page views, date and time of your visit, and other information about your use of Twin websites. We also collect and may store information that your computer or mobile device provides to us in connection with your use of Twin Websites such as your browser type, type of computer or mobile device, browser language, IP address, mobile carrier, unique device identifier, location, and requested and referring URLs.



We also receive information when you view content on or otherwise interact with Twin websites, if your company has a fixed IP address, even if you have not created an account. For more information, see the “Cookies, Pixels and Tracking” section below and our Cookie Policy.

Engagement

We collect browsing information – such as IP address and location, date and time stamp, URL, unique advertising or content identifiers (if applicable), and time zone, and other information about user activities on Twin websites, as well as on third party sites. We may also receive information about you from third parties, such as other users, partners (including ad partners), or Conference, Exhibition, FAM trip organisers.

Purposes and Legal Bases for Our Using of Your Information

We do not sell your personal data – such as your name and contact information – to third parties to use for their own marketing purposes. Twin uses the information we collect for our legitimate interests which include the following:

- **Provide our Services.** To provide you the services we offer, respond to your inquiries, provide troubleshooting, and for other customer service purposes.
- **Personalisation.** To tailor the content and information that we may send or display to you, to suggest relevant products and services, promotional offers, market data and information and other advice, e.g. UK visa policy, that we feel may be of value to you.
- **Advertising.** To display interest-based advertising to you in social media or affiliate platforms, to improve our advertising and measurement systems so we can show you relevant content, and to measure the effectiveness of such contact and content.
- **Marketing and Promotions.** For marketing and promotional purposes, such as to send you news and newsletters, special offers, and promotions, or to otherwise contact you about products or information we think may interest you, including information about third party products and services, e.g. University or Work Experience offerings.
- **Analytics.** To gather metrics to better understand how users access and use Twin online and offline content.
- **Comply with Law.** To comply with legal obligations, as part of our general business operations, and for other business administration purposes.
- **Preparation for Litigation** – to retain necessary data to support any historic commercial or legal claims.



You can see our Fair Processing Statement by clicking [here](#) and our Legitimate Interest Impact Assessment by clicking [here](#).

How We Share Your Information

We share information as set forth below, and where individuals have otherwise consented:

- **Service Providers.** We may share your information with third party service providers who use this information to perform services for us, such as accommodation providers, attractions providers, transport and other ground services providers, education partners (e.g. Schools for School Integration hosting providers, auditors, advisors, consultants, customer service and support providers, as well as those who assist us in providing the Ad Services.
- **Affiliates.** The information collected about you may be accessed by or shared with subsidiaries and affiliates of Twin Group Limited, whose use and disclosure of your personal information is subject to this Privacy Policy.
- **Business Transfers.** We may disclose or transfer information, including personal information, as part of any merger, sale, and transfer of our assets, acquisition or restructuring of all or part of our business, bankruptcy, or similar event.
- **Legally Required.** We may disclose your information if we are required to do so by law.
- **Protection of Rights.** We may disclose information where we believe it necessary to respond to claims asserted against us or, comply with legal process (e.g., subpoenas or warrants), enforce or administer our agreements and terms, for fraud prevention, risk assessment, investigation, and protect the rights, property or safety of Twin, its users, or others.
- **Anonymised and Aggregated Data.** We may share aggregate or de-identified information with third parties for research, marketing, analytics and other purposes, provided such information does not identify an individual.

Cookies, Pixels and Tracking

We and our third party providers use cookies, clear GIFs/pixel tags, JavaScript, local storage, log files, and other mechanisms to automatically collect and record information about your usage and browsing activities on Twin Websites and across third party sites or online services. We may combine this information with other information we collect about users. Below, we provide a brief summary of these activities.

Cookies.

These are small files with a unique identifier that are transferred to your browser through our websites. They allow us to understand how users



navigate through and use Twin websites, and to display personalised content and targeted ads (including on third party sites and applications).

Pixels, web beacons, clear GIFs.

These are tiny graphics with a unique identifier, similar in function to cookies, which we use to track the online movements of users of Twin Websites and the web pages of users of our Ad Services, and to personalise content. We also use these in our emails to let us know when they have been opened or forwarded, so we can gauge the effectiveness of our communications.

Analytics Tools.

We may use internal and third party analytics tools, including Google Analytics. The third party analytics companies we work with may combine the information collected with other information they have independently collected from other websites and/or other online products and services. Their collection and use of information is subject to their own privacy policies.

How We Protect Your Information

The security of your information is important to us. Twin has implemented safeguards to protect the information we collect. However, no website or internet transmission is completely secure. We urge you to take steps to keep your personal information safe, such as choosing a strong password and keeping it private, as well as logging out of your user account, and closing your web browser when finished using the Twin Agent Zone on a shared or unsecured device.

Access and Amend Your Information

You may request to receive, update or correct your personal information at any time by contacting us at marketing@twinuk.com. You can also manage your email marketing preferences by visiting the email preferences centre. The unique link to your personal email marketing preferences centre can be found at the bottom of our email communications. If you opt-out of receiving emails about recommendations or other information we think may interest you, we may still send you transactional emails about your account or any services you have requested or received from us.

Third Party Ad Networks

For information about and to opt out of interest-based ads from many ad networks, go to:

- European Union: www.youronlinechoices.eu
- Canada: www.youradchoices.ca



- U.S.: www.aboutads.info

Your Rights

Access Amendment, Deletion, Portability, Objection and Other Rights.

If you wish to access or update your personal information, you may contact our privacy coordinator, as set forth below, to access or amend your personal information, to request that we rectify, delete or stop processing your personal information, to withdraw your consent to our processing, and, if you are an EEA resident, to exercise your opt-out rights or place a data portability request.

Requests should be directed to marketing@twinuk.com (or at the Contact Us information shown below). Please keep in mind that certain services will not be available if you withdraw your consent, or otherwise delete or object to our processing of certain personal information. We will respond to your request in accordance with applicable law.

Complaints.

You also have the right to lodge a complaint with a supervisory data protection authority

Retention of Your Data

We will generally retain your profile and related personal information for up to 7 years after your last transaction with us – agents do sometimes return to us. If you wish to “be forgotten” by Twin (i.e., request the deletion of your personal information from all Twin Systems,), we will delete all data save for your name and agent name, which we must retain for 7 years in case later litigation matters arise.

Transferring Your Data

Twin is headquartered in the United Kingdom, and has operations, entities and service providers in other countries. As such, we and our service providers may transfer your personal information to, or access it in, jurisdictions that may not provide the equivalent levels of data protection of your home jurisdiction. We will take steps to ensure that your personal information receives an adequate level of protection in the jurisdictions in which we process it, including through: putting in place appropriate written data processing terms and/or data transfer agreements, using contractual clauses as approved by the European Commission (the form for the standard



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contractual clauses can be found here: <https://ico.org.uk › media › uk-sccs-c-c-202107>), or following an adequacy decision by the EU Commission.

Children's Privacy

We do not knowingly collect or solicit personal information from anyone under the age of 13 (or under the age of 14 for anyone living in Spain or South Korea), or knowingly allow such persons to register. If we become aware that we have collected personal information from a child under the relevant age without parental consent, we take steps to delete that information.

Links to Other Websites

The Twin Websites may contain links to third-party sites or online services. We are not responsible for the practices of such third parties, whose information practices are subject to their own policies and procedures, not to this Privacy Policy.

Contact Us

If you have any questions about our practices or this Privacy Policy, please contact us at AButcher@twinuk.com, or send mail to:

Twin Group, 12 Lambarde Square, Greenwich, London SE10 9GB

The policy applies to all Twin Group companies.