**Website Privacy Policy**

**Introduction**

Welcome to Longview Productions Ltd’s privacy policy (**Policy**).

Longview Productions Ltd respects your privacy and is committed to protecting your personal data. This Policy will inform you as to how we look after your personal data when you visit our website https://www.room151.co.uk/ (**site** or **website**) (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

References to **we**, **us** or **our** in this Policy mean Longview Productions Ltd. Any other capitalised terms which are not defined herein are defined in our terms of use.

By continuing to use our website and providing your information to us, you confirm that you accept the terms of this Policy and that you agree to comply with and be bound by them. Please do not provide us with any of your information if you do not want it to be used in the ways described in this Policy. If you do not agree to the terms of this Policy, you must not access or use our site or create an account with us.

We may update this Policy at any time in which case the then current cookie policy in force shall apply. You are therefore advised to check this page from time to time. Any such changes will become binding on you on your first use of our website after the changes have been made.

Please also use the Glossary to understand the meaning of some of the terms used in this Policy.

1. Important information and who we are

**Who we are**

We operate a website that provides content for investment managers and other interested parties where you can browse articles, podcasts and webinars concerning the topic of green investment. For more information see: <https://room151.dev.docandtee.com/about/>.

**Purpose of this Policy**

This Policy aims to give you information on how we collect and process your personal data through your use of this website, including any data you may provide through this website when you purchase a product or service or engage with us to learn about products and services.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this Policy together with any other privacy policy or fair processing policy 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 data. This Policy supplements other notices and privacy policies and is not intended to override them.

**Controller**

We collect, use and are responsible for certain personal data about you. When we do so we are regulated under the **UK GDPR** (consisting of the UK Data Protection Act 2018, as amended and updated in light of the UK’s departure from the European Union) and the **EU GDPR** (the General Data Protection Regulation (EU) 2016/79, as amended from time to time), as applicable based on your location in the United Kingdom or the European Union and we are responsible as **controller** of that personal data for the purposes of those laws.

**Contact details**

If you have any questions about this Policy or our privacy practices, please contact us in the following ways:

Full name of legal entity: Longview Productions Ltd (Company Number: 06650714)

Email address: subscriptions@room151.co.uk

Postal address: Blackwell House, Guildhall Yard, London, England, EC2V 5AE

You have the right to make a complaint at any time to your local supervisory authority. If you are based in the United Kingdom, then this will be the Information Commissioner’s Office (ICO), who is the UK regulator for data protection issues. For more information, please visit [www.ico.org.uk](http://www.ico.org.uk/). If you are based in the European Union, please consult the following website to find out the details of your local supervisory authority: <https://edpb.europa.eu/about-edpb/board/members_en>.

We would, however, appreciate the chance to respond to your query and deal with your concerns before you approach a supervisory authority so please contact us in the first instance.

**Changes to the Policy and your duty to inform us of changes**

We keep our Policy under regular review. This policy was last updated on the 1st of May 2025. We may change this Policy from time to time, when we do, we will update this Policy on the Website. It is your responsibility to ensure you are always up to date of the latest policy in force.

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, for example a new address or email address.

**Third-party links**

This website may include links to third-party 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 these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

1. The types of Personal data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

* **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
* **Contact Data** includes billing address, delivery address, email address and telephone numbers.
* **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
* **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this website.
* **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
* **Usage Data** includes information about how you interact with and use our website, products and services.
* **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We collect this personal data from you either directly, such as when you contact us or indirectly, such as your browsing activity while on our website (see our cookie policy for more information on automatic collection).

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

**If you fail to provide personal data**

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 goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

1. How is your personal data collected?

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 or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
* enquire about or apply for our products or services;
* create an account on our website;
* subscribe to any of our information update services;
* request marketing to be sent to you; or
* give us feedback or contact us.
* **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy <https://room151.dev.docandtee.com/cookies-policy/> for further details.
* **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
* analytics providers such as Google based outside the UK;
* advertising networks;
* search information providers;
* third party providers of technical, payment and delivery services;
* third party data brokers or aggregators; and
* publicly available sources.
1. How we use your personal data

We will only use your personal data when the law allows us to. Please refer to the *Glossary* to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we rely on consent

as a legal basis for processing your personal data where we have obtained your active agreement to use your personal data for a specified purpose, for example if you consent to receiving third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting our DPO using the contact details set out in paragraph 1 above.

**Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact our DPO using the contact details set out in paragraph 1 above if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

|  |  |  |
| --- | --- | --- |
| **Purpose/Activity** | **Type of data** | **Lawful basis for processing including basis of legitimate interest** |
| To register you as a new customer | (a) Identity(b) Contact | (a) Necessary for our legitimate interests (to enable us to process your order); and(b) Performance of a contract with you. |
| To process and deliver your order including:(a) Manage payments, fees and charges(b) Collect and recover money owed to us | (a) Identity(b) Contact(c) Financial(d) Transaction(e) Marketing and Communications | (a) Performance of a contract with you; and(b) Necessary for our legitimate interests (to recover debts due to us). |
| To manage our relationship with you which will include:(a) Notifying you about changes to our terms, privacy policy or cookie policy(b) Asking you to leave a review or take a survey(c) Dealing with your requests, complaints and queries | (a) Identity(b) Contact(c) Profile(d) Marketing and Communications | (a) Performance of a contract with you;(b) Necessary to comply with a legal obligation; and(c) Necessary for our legitimate interests (to keep our records updated, to manage our relationship with you and to study how customers use our products/services). |
| To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | (a) Identity(b) Contact(c) Technical | (a) Necessary for our legitimate interests (running our business, provision of administration and IT services, network security); and(b) Necessary to comply with a legal obligation. |
| To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you | (a) Identity(b) Contact(c) Profile(d) Usage(e) Marketing and Communications(f) Technical | Necessary for our legitimate interests (to develop our business and inform our marketing strategy). |
| To use data analytics to improve our website, products/services, marketing, customer relationships and experiences | (a) Technical(b) Usage | Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy). |
| To send you relevant marketing communications and make personalised suggestions and recommendations to you about goods or services that may be of interest to you based on your Profile Data | (a) Identity(b) Contact(c) Technical(d) Usage(e) Profile(f) Marketing and Communications | Necessary for our legitimate interests (to develop our business and inform our marketing strategy). |
| To inform you of industry events | (a) Identity(b) Contact(c) Technical(d) Usage(e) Profile(f) Marketing and Communications | Necessary for our legitimate interests (to market and raise awareness about exclusive industry events that are likely to be of interest to you and facilitate organisation of such events).  |
| To complete orders for products or services or respond to enquiries prior to a purchase | (a) Identity(b) Contact(c) Technical(d) Usage(e) Profile(f) Marketing and Communications | (a) Necessary for our legitimate interests (to manage properly your enquiry); and(b) Performance of a contract with you. |
| To comply with professional, legal and regulatory obligations that apply to our business, such as tax, money laundering or health and safety regulations | (a) Identity(b) Contact(c) Financial(d) Transaction | We will only use your personal data to the extent that the law requires us to do in order to comply with our legal obligations.  |

**Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

* **Promotional offers from us****.** We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing). You will receive marketing communications from us if you have requested information from us or if you provided us with your details when you registered on our website and, in each case, you have not opted out of receiving that marketing.
* **Third party marketing.** We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.
* **Opting out****.** You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, feedback or other transactions.
* **Cookies****.** You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see <https://room151.dev.docandtee.com/cookies-policy/>.
* **Change of purpose****.** 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 our DPO using the contact details set out in paragraph 1 above. 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.

1. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table “*Purposes for which we will use your personal data”* of paragraph 4:

* the Third Parties as set out in section B of the Glossary;
* any specific third parties listed in the table “*Purposes for which we will use your personal data”* of paragraph 4; and
* third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. Some of these third party recipients may be based outside the UK and EEA — for further information including on how we safeguard your personal data when this occurs, see International Transfers below.

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.

1. International transfers

We do not transfer your personal data outside the UK and European Economic Area (**EEA**) save as expressly set out in this Policy.

Whenever we transfer your personal data out of the UK and EEA, we will only do so for the purposes mentioned in this Policy and any contract that we have entered into with you or the entity that you are representing.

Countries outside of the UK and the EEA do not have the same data protection laws as the UK and EEA. Therefore, when making such a transfer of data, we will always rely on a safeguard mechanism under the UK GDPR or the EU GDPR (including, without limitation, the use of specific contracts approved for use in the UK which give personal data the same protection it has in the UK). We will only transfer your personal data to a country which the European Commission or the UK authorities have given a formal adequacy decision or regulation that confirms this third-country provides an adequate level of data protection similar to those which apply in the UK and EEA.

If the third-country does not have an adequacy decision awarded to it, any transfer of your personal information will be subject to entering into the European Commission’s Standard Contractual Clauses which are designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal data.

Transfers of personal data from the EEA to the UK shall be done on the basis of an adequacy decision awarded by the European Commission to the UK in June 2021.

Please contact our DPO using the contact details set out in paragraph 1 above if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

1. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

1. Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

1. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click here to find out more about these rights. For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner’s Office (ICO) on individuals’ rights under the General Data Protection Regulation.

If you wish to exercise any of your legal rights, please contact our DPO using the contact details set out in paragraph 1 above. We will require information from you to allow us to identify you. We will endeavour to respond to all requests with 30 days of receipt.

**No fee usually required**

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

**What we may need from you**

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.

**Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could 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.

1. Glossary
2. **Lawful basis**

**Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

**Consent** means processing your data where you have given your consent for us to do so for one or more specific reasons. You have the right to withdraw consent to marketing at any time by contacting our DPO using the contact details set out in paragraph 1 above.

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. 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.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

1. **Third parties**
* Third parties we use to help deliver our products and services.
* Service providers who provide IT and system administration services or who assist us with customer insight marketing analytics.
* Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
* HM Revenue & Customs, regulators, law enforcement or other authorities who require reporting of processing activities in certain circumstances.
1. **Your legal rights**

Under the UK GDPR and the EU GDPR, you have a number of important rights free of charge. In summary, those include rights 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 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 we hold about you corrected, though we may need to verify the accuracy of the new data 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 information unlawfully or where we are required to erase your personal data to comply with local law. 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 information 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:

* If you want us to establish the data's accuracy.
* Where our use of the data is unlawful but you do not want us to erase it.
* 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.
* 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.