



Privacy Policy

Please take a moment to read our Privacy Policy to learn how [SMG.TO](#) handles client information.

You can access this privacy statement from the bottom of every page on our website by clicking the appropriate link. Any changes to these policies will be posted on this page.

This Privacy Policy sets out how [SMG.TO](#) complies with European Union data protection requirements, specifically those pursuant to the General Data Protection Regulation (“GDPR”), effective from 25th May 2018.

[SMG.TO](#) takes your privacy seriously. Because we gather certain types of information about our website users, we want you to understand the terms and conditions surrounding the collection and use of that information. This privacy statement discloses the types of information we gather, how we use it and how to correct or change it.

How and why do we collect information about you?

At certain points during your visit to our website, we may ask you to enter personal details such as your name, address, telephone number or email address. You will also be asked whether you consent to use of that data and for what purposes it will be used. We will not use your data except to fulfil a request you make when disclosing those details and except in accordance with this Privacy Policy with your consent.

The information that we need for these purposes is known as your “Personal Data”.

When you visit [SMG.TO](#)'s website, we have the ability to automatically collect information about your visits, such as your browser type, your IP address, and the website from which you came.

We also collect information about you when you fill in any of the forms on our website i.e. sending an enquiry or giving feedback etc. Please see “The purpose of controlling and/or processing your Personal Data” section below.

We may collect information about your preferences both when you tell us what these are and by analysis of site traffic, including the use of IP addresses and cookies. Please see our page on '[cookie usage](#)' to find out how we use this data.

When submitting forms on our website we do not use a third-party provider for automated data collection and processing purposes and we will only hold the data in line with this Privacy Policy.

Analytics and Re-marketing

To enhance your experience across the [SMG.TO](#) website, please note that we use 'StatCounter.Com' to store information about how visitors use our website so that we may make improvements to the customer journey and give visitors a better user experience. StatCounter.Com is a third-party information storage system that records information about the pages you visit, the length of time you were on specific pages and the website in general, how you arrived at the site and what you clicked on when you were there. These cookies do not store any personal information about you eg. name, address etc. and we do not share the data.

Should you have any queries regarding the capture, storage and use of personal information by [SMG.TO](#), please contact us.

Other websites

Our website may contain links to other websites. Once you have clicked on these links we do not have any control over the websites at which you will arrive. Therefore, we cannot be responsible for the protection and privacy of any information that you provide whilst visiting such sites. You should look at the privacy statement applicable to the website in question.

Internet-Based Advertising

We use Facebook, Twitter and Google Adwords advertising services and as such there are tracking codes installed on our website so that we can manage the effectiveness of these campaigns. We do not store any personal data within this type of tracking.

IP addresses

An IP or Internet Protocol Address is a unique numerical address assigned to a computer as it logs on to the internet. SMG.TOr does not have access to any personally identifiable information and we would never seek this information.

When you visit our website, we store web server logs that show your IP address, this gives us information such as which pages you looked at, whether the page request was successful or not and which browser you use to view the page. The use of this data is purely for statistical purposes or to perform any legal access request that we receive.

Will we disclose the information to third parties?

We will never pass your information on to sister companies or other companies, except in accordance with this Privacy Policy and in accordance with your consent (see “The recipients or categories of recipients of your personal data” section below.

Your details will be treated in the strictest confidence.

Should you have any queries regarding the obtaining of, storage of or use of Personal Data by [SMG.TO](#), please contact us.

Transfer of your personal data to any third countries or international organisations

[SMG.TO](#) will not transfer your personal data to any third countries and/or outside of the EU.

Your rights

Under the terms of data protection legislation, you have the following rights as a result of using the [SMG.TO](#) website:

Right to Be Informed

This Privacy Policy, together with our Cookies Policy, fulfils our obligation to tell you about the ways in which we use your information as a result of you using this website.

Your right to withdraw consent

The legal basis for processing your Personal Data is your consent. You have the right to withdraw that consent and should you choose to do so, you should contact [SMG.TO](#)'s Data Protection Officer at the address shown above or via e-mail at: contact@smg.to

Right to Access (Subject Access Requests)

You have the right to ask us for a copy of any Personal Data that we hold about you. This is known as a “Subject Access Request”. Except in exceptional circumstances (which we would discuss and agree with you in advance), you can obtain this information at no cost.

We will send you a copy of the information requested within one calendar month from the date following the date of receipt of your request.

To make a Subject Access Request, please write to our Data Protection Officer.

Right to Be Forgotten

From 25 May 2018, you can ask that we erase all personal information that we hold about you. Where it is appropriate that we comply, your request will be fully actioned within one calendar month from the date following the date of receipt of your request, unless we require more time to deal with your request in which case this will be communicated to you. For further information, please contact our Data Protection Officer at 1 Telegraph Street, London, EC2R 7AR or via email at contact@smg.to.

Right to Object

You have the right to object to the continued use of your data for any purpose listed above for which consent is identified as the lawful basis for processing i.e. you have the right to withdraw your consent at any time.

Right to Restrict Processing

If you wish us to restrict the use of your data because (i) you think it is inaccurate but this will take time to validate, (ii) you believe our data processing is unlawful but you do not want your data erased, (iii) you want us to retain your data in order to establish, exercise or defend a legal claim, or (iv) you wish to object to the processing of your data, but we have yet to determine whether this is appropriate, please contact our Data Protection Officer at 1 Telegraph Street, London, EC2R 7AR or via email at contact@smg.to.

Right to Data Portability

If you would like to move, copy or transfer the electronic Personal Data that we hold about you to another organisation, please contact our Data Protection Officer at 1 Telegraph Street, London, EC2R 7AR or via email at contact@smg.to.

Rights Related To Automated Decision-Making

If you would like to object to automated decision making without any individual involvement, and to the profiling of your data, please contact our Data Protection Officer at 1 Telegraph Street, London, EC2R 7AR or via email at contact@smg.to.

Your right to lodge a complaint with the Information Commissioner's Office

If you have concerns about the way in which [SMG.TO](#) controls and/or processes your data, you have the right to complain to the Information Commissioner's Office whose details are as follows:

By telephone: 0303 123 1113 (local rate – calls to this number cost the same as calls to 01 or 02 numbers).

By E-mail: <https://ico.org.uk/concerns/>

What if you think we have incorrect information about you or if you would like a copy of the information we hold about you?

You can make a Subject Access Request by writing to the Data Protection Officer at 1 Telegraph Street, London, EC2R 7AR or via email at contact@smg.to.

[SMG.TO](#) will comply with your request within one calendar month from the date following the date of receipt of your request, save that [SMG.TO](#) can refuse or charge for requests which it considers are manifestly unfounded or excessive and in these circumstances, we will tell you why we are refusing to comply and/or charges in respect of your request and the remedies available to you.

If we need more time to comply with your request we will communicate this to you.

If you believe that any information we are holding on to you is incorrect or incomplete, please write to us or e-mail us as soon as possible. We will promptly correct any information which is found to be incorrect.

How Long Will We Retain Information For

[SMG.TO](#) will retain information in relation to your enquiry for the following periods:

- Call recordings – a period not exceeding six months from the date of your call;
- Paper and/or electronic files comprised of [SMG.TO](#)'s records pertaining to your enquiry – for a period not exceeding seven years from the date of your initial enquiry.

Review of [SMG.TO](#) Website Privacy Policy

[SMG.TO](#) will regularly review its Privacy Policy in respect of its website and such review will be performed on an annual basis. This Privacy Policy was last updated and reviewed in September 2018 and changes made to it to reflect the additional requirements in relation to data protection by GDPR. Any changes to the [SMG.TO](#) Privacy Policy will be published on our website.