



AZoNetwork our Clients and GDPR

The document below sets out our key GDPR policies and actions for the benefit of all clients.

In the document below, to reduce confusion and to increase readability, I'll refer to yourself as one of our Clients as a "Supplier".

Of course, as you'd expect, we must make the statement that we are not legal advisers and you should seek your own legal advice about how to proceed under GDPR regulations.

If during your reading this document you have any questions whatsoever, I am more than happy to discuss further.

Dr. Ian Birkby, CEO,

email: ianbirkby@azonetwork.com or mobile: +61 417 045 307.

1. The AZoNetwork Approach

We are fully committed to our mission to provide free open access to high quality scientific information to a global audience. We are also fully committed to maintaining the highest standards of personal privacy and data integrity at all times.

2. Updates to our Terms and Privacy Policy

We have worked with our UK lawyers to validate our approach to GDPR and our legal basis for processing information related to site visitors (Data Subjects) and the activities of subscribers (Data Subjects) on all AZoNetwork properties.

Our revised and updated Terms and Policy can be viewed via the following links;

<https://www.azonetwork.com/marketing-science/terms>

<https://www.azonetwork.com/marketing-science/privacy>

3. How we process data from AZoNetwork interactions with EU Citizens.

3.1 Request for Quotations (RFQs)

We provide all EU citizens with the opportunity to request further information or supplier quotations as we always have done. We can proceed with this service only if we have received the required consent from the Data Subject during the fill-in form process. The information will then be sent directly to the related supplier. In GDPR Terms this represents a Controller – Controller transaction and the supplier is subject to the following obligations which will be stated on the individual RFQ;



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“You are responsible for your compliance with data protection law in respect of the information you receive in this RFQ. It is provided to you solely to enable you to respond and for no other purpose.”

Further, our Standard Terms of Business have changed to include the following;

“Any personal data received as a result of any Content Marketing or Advertising conducted by AZoNetwork on your behalf will be processed lawfully and in accordance with applicable data protection law and, in particular, will not be used for any direct marketing for which the recipient has not consented or has withdrawn consent.”

3.2 Brochure or PDF Download

We have implemented changes that provide an EU Visitor with additional granular consent in relation to the visitor consenting to their information being passed on to the supplier. It may be the case that the site visitor downloading the Brochure or PDF doesn't provide consent for their details to be passed onto the supplier. In this case we log their preferences and log the interaction in AZoIntel but no Personally Identifiable Information is passed onto the Supplier.

Assuming, the site visitor has requested their details be passed onto the supplier, In GDPR Terms this represents a Controller – Controller transaction and the supplier is subject to the following obligations which will be stated on the individual PDF/Brochure Download;

“You are responsible for your compliance with data protection law in respect of the information you receive in this Brochure/PDF request. It is provided to you solely to enable you to respond and for no other purpose.”

As with the RFQ request above, the supplier is also subject to the changes in our Standard Terms as set out below;

“Any personal data received as a result of any Content Marketing or Advertising conducted by AZoNetwork on your behalf will be processed lawfully and in accordance with applicable data protection law and, in particular, will not be used for any direct marketing for which the recipient has not consented or has withdrawn consent.”



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4. Email Marketing Policies

We currently operate two email activities, specifically, (a) Email Newsletters and (b) Customised Emails sent to a target audience on behalf of a supplier.

In both cases we will only send an Email to an individual if we have valid consent. We requested that all our Pre-GDPR EU subscribers provided us with valid consent as we weren't happy that we had sufficient granular consent pre-GDPR. All our EU database is now GDPR compliant.

EU email recipients are also made aware that if they click on any "Supplier Link" in a newsletter or customised email their details may be shared with the related supplier and the Supplier may contact them in relation to their specific area of interest, but not in relation to General Direct Marketing without seeking appropriate consent.

Where we send a Supplier Report of the performance of an Email Campaign (either newsletter or customised email) we only transfer PID in the report where we have the consent of the Data Subject.

If a Data Subject later unsubscribes (removing their consent), we'll anonymize their PID which is why there will sometimes be anonymized leads in the newsletter/customized email reports.

5. Cookie Consent Policies

All AZoNetwork sites have Granular Cookie Consent policies.

The graphic below which is visible on all AZoNetwork properties illustrates the choices available to all site visitors
We have developed our own codebase to record the related consents and actions.

All AZoNetwork sites are compliant with regards to global cookie policies through the deployment of "OneTrust" on all sites.

A specific example is set out below in relation to the GDPR related terms. The specific cookie policies may be different in non-GDPR jurisdictions.



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An AZoNetwork Site

Search...

We Care About Your Privacy

We and our 1 partners store and/or access information on a device, such as unique IDs in cookies to process personal data. You may accept or manage your choices by clicking below, including your right to object where legitimate interest is used, or at any time in the privacy policy page. These choices will be signaled to our partners and will not affect browsing data. [See our privacy policy.](#)

We and our partners process data to provide:

Use precise geolocation data. Actively scan device characteristics for identification. Store and/or access information on a device. Personalised advertising and content, advertising and content measurement, audience research and services development.

List of Partners (vendors)

Show Purposes

Reject All

I Accept



About Your Privacy

We process your data to deliver content or advertisements and measure the delivery of such content or advertisements to extract insights about our website. We share this information with our partners on the basis of consent and legitimate interest. You may exercise your right to consent or object to a legitimate interest, based on a specific purpose below or at a partner level in the link under each purpose. These choices will be signaled to our vendors participating in the Transparency and Consent Framework. [See our privacy policy.](#)

Allow All

Manage Consent Preferences

+ Strictly Necessary Cookies	Always Active
+ Performance Cookies	<input type="checkbox"/>
+ Functional Cookies	<input type="checkbox"/>
+ Targeting Cookies	<input type="checkbox"/>
+ Store and/or access information on a device	<input type="checkbox"/>

1 partners can use this purpose

Reject All

Confirm My Choices

Powered by **onetrust**



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6. AZoIntel

You will continue to have access to the AZoIntel Analytics platform subject to the following GDPR obligations;

“Any personal data received as a result of any Content Marketing or Advertising conducted by AZoNetwork on your behalf will be processed lawfully and in accordance with applicable data protection law and, in particular, will not be used for any direct marketing for which the recipient has not consented or has withdrawn consent.”

Any PID provided within the AZoIntel platform will have been provided with the consent of the data subject. Where an interaction has occurred, for example an EU Citizen downloading a PDF without providing consent, the relevant information will be anonymised.

7. Supplier/Client FAQs

7a. Can I add the Leads from AZoNetwork into my Marketing Automation system?

- o Yes, provided you ensure that you have some method of identifying the lead as not being for “Direct Marketing” until you have received the appropriate consent.

7b. Do you have a Manual of your GDPR Procedures and Systems.

- o Yes and it is available for inspection.

7c. We have received an RFQ and would like to check that we enter the details correctly on our customer database. With the new GDPR regulations, have you changed the way that we can use the information from these RFQ's? In the past, we have used their data freely to contact the customer about their request. In addition, we would then send this customer emails about relevant products and services. Is this still the case, or should we not send them 'marketing' emails.

- o We have consent to pass on the RFQ and the associated PID, the Data Subject is expecting the Supplier will answer their specific question, namely, provide them with a quotation and “related information” – the Data Subject has specifically agreed to;

I would like the AZoNetwork [Suppliers](#) to email me with quotations, content updates and related products and services.

7d. Does the above level of consent mean that the Data Subject can be contacted again in future about their specific request?

- o Although you should check your on specific circumstances, it's generally considered reasonable for the supplier to conduct an ongoing dialogue with the Data Subject related to **quotations, content updates and related products and services** as they have a “Legitimate Business Interest” in communicating with the Data Subject about their area of interest. This is referenced as a “Transactional” relationship, or perhaps best understood as a “normal” business relationship.



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- o Of course, it's also important that the supplier has the relevant GDPR protocols in place such that the Data Subject can request that their data is removed or suppressed, plus all the other GDPR requirements that should be covered by the supplier's GDPR protocols, privacy policy etc.
- o Where there is a grey area is in relation to what is reasonable for the Supplier to provide to the Data Subject in relation to, "*content updates and related products and services.*" If you are a company that produces a single product then adding a Data Subject to your General Direct Marketing list may be OK, but if the Data Subject has requested information on a "Raman Spectrometer" and they receive Direct Marketing related to "Density Meters" that's probably not OK. These are areas where each organisation should take specific advice in relation to their circumstances. Equally the problem goes away if consent is sought in relation to Direct Marketing communications.



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8. EU and Rest of World Changes

Whilst many of the changes discussed in this document, codebase improvements and policies apply on a Global Basis, our GDPR policies are specifically applicable to EU Citizens and Site Visitors. As there are other Privacy Law changes that have been foreshadowed around the world it is our policy as an operator of a suite of global websites to implement changes related to other jurisdictions as and when legislation is enacted.

9. Legal Entities

AZoM.com Limited, Sydney, Australia, trading As AZoNetwork is the parent company and beneficial owner of all AZoNetwork properties.

AZoNetwork UK Ltd. Manchester, UK, Is a wholly owned subsidiary of AZoM.com Limited and operates websites on behalf of AZoM.com Limited.

EU Data Subject Rights are processed by AZoNetwork UK Ltd. Registered with ICO UK.
ROW Data Subject Rights are processed by AZoM.com Limited.

10. Additional Security and Privacy Measures

10.1 TrustArc Certified privacy Seal – AZoNetwork is currently certified to Truse’s Enterprise Privacy and Data Governance Practices Certification Program <https://privacy.truste.com/privacy-seal/validation?rid=80814776-9892-4bc0-a905-50180d9d0296>

10.2 Cyber Essentials Plus – AZoNetwork is certified to Cyber Essentials Plus <https://registry.blockmarktech.com/certificates/b5720d0b-7698-4c0d-b58c-92920915c193/>

A final legal note

We have provided in good faith a summary statement of our position in relation to GDPR compliance. However, we are not lawyers and you should take your own legal advice in relation to any areas that may cause you concern.

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