

# **GDPR – PRIVACY POLICY**

## **Influence Associates Ltd**

Influence Associates Limited trading as Influence Associates (“We”) are committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

### **1. POLICY STATEMENT**

1.1 Everyone has rights with regard to the way in which their personal data is handled. During the course of our activities we will collect, store and process personal data relating to journalists and others for our public relations, communication and press services (**Services**), and we recognise that the correct and lawful treatment of this personal data will maintain confidence in our organisation and will provide for successful business operations.

1.2 Data users are obliged to comply with this policy when processing personal data on our behalf. Any breach of this policy may result in disciplinary action.

### **2. ABOUT THIS POLICY**

2.1 The types of personal data that Influence Associates Ltd (**We**) may be required to handle include information about current, past and prospective journalists and other editorial and media contacts and public relations professionals that we communicate with. The personal data, which may be held on paper or on a computer or other media, is subject to certain legal safeguards specified in the Data Protection Act 1998 (the **Act**), the General Data Protection Regulation (the **GDPR**) and other regulations.

2.2 This policy and any other documents referred to in it sets out the basis on which we will process any personal data we collect from Data Subjects, or that is provided to us by Data Subjects or other sources.

2.3 This policy does not form part of any employee's contract of employment and may be amended at any time.

2.4 This policy sets out rules on data protection and the legal conditions that must be satisfied when we obtain, handle, process, transfer and store personal data for the Services.

2.5 Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to James Andrew, Director, +44 207 287 9610, james@influenceassociates.com.

### **3. DEFINITION OF DATA PROTECTION TERMS**

3.1 **Data** is information which is stored electronically, on a computer, or in certain paper-based filing systems.

3.2 **Data subjects** for the purpose of this policy include living journalists, other living editorial and media contacts and all other living individuals about whom we hold personal data. A data subject need not be a UK national or resident. All data subjects have legal rights in relation to their personal information.

3.3 **Personal data** means data relating to a living individual who can be identified from that data (or from that data and other information in our possession). Personal data can be factual (for example, a name, address or date of birth) or it can be an opinion about that person, their actions and behaviour.

3.4 **Data controllers** are the people who or organisations which determine the purposes for which, and the manner in which, any personal data is processed. They are responsible for establishing practices and policies in line with the Act and the GDPR. We are the data controller of all personal data collected stored and processed for our Services.

3.5 **Data users** are those of our employees whose work involves processing personal data. Data users must protect the data they handle in accordance with this data protection policy and any applicable data security procedures at all times.

3.6 **Data processors** include any person or organisation that is not a data user that processes personal data on our behalf and on our instructions. Employees of data controllers are excluded from this definition but it could include suppliers, which handle personal data on our behalf.

3.7 **Processing** is any activity that involves use of the data. It includes obtaining, recording or holding the data, or carrying out any operation or

set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties.

3.8 **Schedule** the schedule at the end of this document summarising our data processing activities.

#### **4. DATA PROTECTION PRINCIPLES**

Anyone processing personal data must comply with the eight enforceable principles of good practice. These provide that personal data must be:

- (a) Processed fairly and lawfully.
- (b) Processed for limited purposes and in an appropriate way.
- (c) Adequate, relevant and not excessive for the purpose.
- (d) Accurate.
- (e) Not kept longer than necessary for the purpose.
- (f) Processed in line with data subjects' rights.
- (g) Secure.
- (h) Not transferred to people or organisations situated in countries without adequate protection.

#### **5. FAIR AND LAWFUL PROCESSING**

5.1 The Act and the GDPR are not intended to prevent the processing of personal data, but to ensure that it is done fairly and without adversely affecting the rights of the data subject.

5.2 For personal data to be processed lawfully, it must be processed on the basis of one of the legal grounds set out in the Act and the GDPR. These include, among other things, the processing necessary for the performance of any media relations activity we undertake with the data subject, for the compliance with a legal obligation to which the data controller is subject, or for the legitimate interest of the data controller or the party to whom the data is disclosed.

5.3 When we collect and process personal data, we do so only in the pursuit of and in accordance with the real and present legitimate interests of our business and taking into consideration the fundamental rights and freedoms of the relevant data subjects, in particular:

- (a) our collection and processing of personal data is limited to the specific purposes set out in the Schedule or to any other purposes specifically permitted by the Act or the GDPR;
- (b) we always endeavour to notify data subjects of our collection and processing of personal data in accordance with this policy; and
- (c) data subjects have the right to request that we not collect and process their personal data at any time in accordance with this policy.

5.4 When sensitive personal data is being processed, additional conditions must be met. When processing personal data as data controllers in the course of our business, we will ensure that those requirements are met.

## **6. PROCESSING FOR LIMITED PURPOSES**

6.1 In the course of our business, we may collect and process the personal data set out in the Schedule. This may include data we receive directly from a data subject (for example, by completing forms or by corresponding with us by mail, phone, email or otherwise) and data we receive from other sources (including, for example, social media accounts, publisher websites, business partners and others).

6.2 We will only process personal data for the specific purposes set out in the Schedule or for any other purposes specifically permitted by the Act or the GDPR. We will always endeavour to notify those purposes to the data subject when we first collect the data or as soon as possible thereafter.

## **7. NOTIFYING DATA SUBJECTS**

7.1 If we collect or process personal data, we will always endeavour to inform them about:

- (a) The source from which we obtained their personal data;
- (b) The purpose or purposes for which we intend to process that personal data;
- (c) The types of third parties, if any, with which we will share or to which we will disclose that personal data; and
- (d) The means, if any, with which data subjects can limit or prevent our use and disclosure of their personal data.

7.2 We will also inform data subjects whose personal data we process that we are the data controller with regard to that data.

## **8. ADEQUATE, RELEVANT AND NON-EXCESSIVE PROCESSING**

We will only collect personal data to the extent that it is required for the specific purpose notified to the data subject.

## **9. ACCURATE DATA**

We will ensure that personal data we hold is accurate and kept up to date. We will check the accuracy of any personal data at the point of collection and at regular intervals afterwards. We will take all reasonable steps to destroy or amend inaccurate or out-of-date data.

## **10. TIMELY PROCESSING**

We will not keep personal data longer than is necessary for the purpose or purposes for which they were collected. We will take all reasonable steps to destroy, or erase from our systems, all data which is no longer required.

## **11. PROCESSING IN LINE WITH DATA SUBJECT'S RIGHTS**

We will process all personal data in line with data subjects' rights, in particular their right to:

- (a) Request access to any data held about them by a data controller (see also clause 15);
- (b) Prevent the processing of their data for direct-marketing purposes;
- (c) Ask to have inaccurate data amended (see also clause 9); and
- (d) Prevent processing that is likely to cause damage or distress to themselves or anyone else.

## **12. DATA SECURITY**

12.1 We will take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

12.2 We will put in place organisational and technical measures to maintain the security of all personal data from the point of collection to

the point of destruction. Personal data will only be transferred to a data processor if he/she agrees to comply with those organisational and technical measures, or if he/she puts in place adequate measures himself/herself.

12.3 We will maintain data security by protecting the confidentiality, integrity and availability of the personal data, defined as follows:

(a) **Confidentiality** means that only people who are authorised to use the data can access it.

(b) **Integrity** means that personal data should be accurate and suitable for the purpose for which it is processed.

(c) **Availability** means that authorised users should be able to access the data if they need it for authorised purposes. Personal data will normally be stored on our central computer system instead of individual PCs.

12.4 Security procedures include:

(a) **Entry controls.** Influence Associates staff can only access the company's facilities with an electronic fob and key. Guests are signed-in and accompanied and may only use the company's WiFi, they don't have access to any internal company systems. Any stranger seen in entry-controlled areas should be reported.

(b) **Methods of disposal.** Paper documents should be shredded. Digital storage devices should be physically destroyed when they are no longer required.

(c) **Equipment.** Data users must ensure that individual monitors do not show confidential information to passers-by and that they log off from their PC when it is left unattended.

(d) **IT Security.** Data is protected by software firewalls and 2-step verification systems and authentication. Computer and mobile devices are protected by PIN/password security.

## **13. TRANSFERRING PERSONAL DATA TO A COUNTRY OUTSIDE THE EEA**

13.1 We may transfer any personal data we hold to a country outside the European Economic Area (EEA), provided that one of the following conditions applies:

(a) The country to which the personal data are transferred ensures an

adequate level of protection for the data subjects' rights and freedoms.

(b) The data subject has given his consent.

(c) The transfer is necessary for one of the reasons set out in the Act or the GDPR, including the performance of our business and any media relations activity we undertake between us and the data subject, or to protect the vital interests of the data subject.

(d) The transfer is legally required on important public interest grounds or for the establishment, exercise or defence of legal claims.

(e) The transfer is authorised by the relevant data protection authority where we have adduced adequate safeguards with respect to the protection of the data subjects' privacy, their fundamental rights and freedoms, and the exercise of their rights.

13.2 Subject to the requirements in clause 12.1 above, personal data we hold may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. That staff may be engaged in, among other things, the fulfilment of contracts with the data subject, the processing of payment details and the provision of support services.

## **14. DISCLOSURE AND SHARING OF PERSONAL INFORMATION**

14.1 We do not disclose personal information you provide to any third parties other than as follows:

(a) As part of the provision of communications services we may disclose information to associates and suppliers, journalists, media organisations, public policy and academic researchers, and other interested parties (although we will not generally disclose personal contact information without your consent);

(b) If we are sub-contracting services to a third party we may provide information to that third party in order to provide the relevant services;

(c) If we are under a duty to disclose or share your personal data in order to comply with any legal obligation (for example, if required to do so by a court order or for the purposes of prevention of fraud or other crime);

(d) In order to enforce any terms or agreements for our services;

(e) We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as

part of any business restructuring or reorganisation, but we will take steps with the aim of ensuring that your privacy rights continue to be protected;

(f) To protect our rights, property and safety, or the rights, property and safety of our users or any other third parties. This includes exchanging information for the purposes of fraud protection and credit risk reduction.

14.2 Other than as set out above, we will not disclose any of your personal information unless you give us permission to do so. If we do supply your personal information to a third party we will take steps to ensure that your privacy rights are protected and that third party complies with the terms of this notice.

14.4 We may also share personal data we hold with selected third parties for the purposes set out in the Schedule at the end of this document.

## **15. DEALING WITH SUBJECT ACCESS REQUESTS**

15.1 Data subjects must make a formal request for information we hold about them. This should be made in writing and we have a dedicated email address for this purpose which is [datamanager@influenceassociates.com](mailto:datamanager@influenceassociates.com). Employees who receive a written request directly should forward it to the data manager immediately.

15.2 When receiving telephone enquiries, we will only disclose personal data we hold on our systems if the following conditions are met:

(a) We will check the caller's identity to make sure that information is only given to a person who is entitled to it.

(b) We will suggest that the caller put their request in writing if we are not sure about the caller's identity and where their identity cannot be checked.

15.3 Our employees will refer a request to their line manager for assistance in difficult situations. Employees should not be bullied into disclosing personal information.

## **16. CHANGES TO THIS POLICY**

We reserve the right to change this policy at any time. Where appropriate, we will notify data subjects of those changes by email.

**Contact:** Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [datamanager@influenceassociates.com](mailto:datamanager@influenceassociates.com).



## Schedule Data Processing Activities

Type of data	Type of data subject	Types of processing
<p>Full name; home address(es); work address(es); telephone number(s); passport details/photocopies; email address(es); employment history; educational history; photograph(s); Other personal data relating to the profession and interests of the data subject.</p>	<p>Journalists and other editorial and media contacts. Public relations and marketing professionals, owner managers of small businesses who engage in PR. Candidates seeking employment in the above roles.</p>	<p>Obtaining, recording or holding the information or data or carrying out any operation or set of operations on the information or data, including:</p> <p>(a) organisation, adaptation or alteration of the information or data;</p> <p>(b) retrieval, consultation or use of the information or data;</p> <p>(c) alignment, combination, blocking, erasure or destruction of the information or data.</p>
Purpose(s) of processing (for example but not exhaustive)	Type of recipient with whom personal data may be shared if relevant	Retention period
<p>(a) Company and client press releases</p> <p>(b) Invitations to product launches, industry corporate events, meetings with company staff and the management team</p> <p>(c) To highlight any spokespeople who may be of interest on a specific industry theme or topic that we deem relevant to the journalists' remit etc.</p> <p>(d) If we are working with another firm on a joint press release where we will share those details with that firm</p> <p>(e) Business and press trips may require your personal details to be stored by the company to help with the travel arrangements, etc.</p> <p>(f) Notifying you about changes to our privacy policy or engagement terms</p> <p>(g) Dealing with a complaint or observation</p>	<p>(a) In-house public relations teams of our clients</p> <p>(b) Subcontractors (travel agencies, hotels, etc.)</p>	<p>Indefinitely unless and until:</p> <p>(a) the data subject ceases to be professionally active for a significant period;</p> <p>(b) the data subject requests the removal of his or her personal data from the Database</p>