

Village Voices Publishing

GDPR: DATA PRIVACY NOTICE FOR CLIENTS AND SUPPLIERS

Introduction

Village Voices Publishing ("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.

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

1. Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject - Natural person.

Categories of data: Personal data and special categories of personal data.

Personal data - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories personal data - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we? Village Voices Publishing is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: PO Box 692, Rochester, Kent, ME1 9LN. For all data matters contact us on 01634 255694.

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3. The purpose(s) of processing your personal data.

- To manage our employees.
- To maintain our own records and accounts
- To inform individuals of news, events and activities
- You may give us information about you by filling in a form on our website www.villagevoicespublishing.co.uk or by corresponding with us by phone, email or otherwise. This includes information you provide when you register to use our site, subscribe to our services, participate in discussion boards or other social media functions linked to our website, enter a competition, promotion or survey and when you report a problem with our website.

4. The categories of personal data concerned.

With reference to the categories of personal data described in the definitions section, we may process the following categories of your data:

- Personal data: Name/address/telephone numbers/email/financial and credit card information.
- We have obtained your personal data from information supplied by you / from our historical records / from a publicly accessible source (local publications, flyers and websites)

5. What is our legal basis for processing your personal data?

a) Personal data (article 6 of GDPR).

Our lawful basis for processing your general personal data:

| | |
|---|--|
| Consent of the data subject | GDPR CONSENT FORM |
| Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract. | Contract to supply advertising services. |
| Processing necessary for compliance with a legal obligation. | To retain records of personal records, sales and financial transactions in accordance to HMRC regulations. |
| Processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. | Publishing news in the public interest for accountability and transparency. |
| Processing necessary for the purposes of the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject. | In the gathering of news, including photographs, from individuals for publication. |

b) Special categories of personal data (article 9 of GDPR).

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Our lawful basis for processing your special categories of data:

| | |
|---|----------------------------------|
| Explicit consent of the data subject | GDPR CONSENT FORM |
| Processing necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement. | Personnel records. |
| Processing necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes. | Archiving of newspaper editions. |

6. Sharing your personal data.

Your personal data will be treated as strictly confidential, we do not share your data.

7. How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary and we only retain your data for the following purposes and use the following criteria to determine how long to retain your personal data.

| Personal data | Retention criteria |
|----------------------------------|---|
| Active customer records. | For the duration of activity + 7 years for HMRC compliance. |
| Dormant clients. | 7 years after last activity on account. |
| Inactive clients. | 12 months. |
| Enquiries through website/email. | Up to 2 years. |
| Staff. | Up to 10 years. |
| Suppliers. | For the duration of activity + 7 years for HMRC compliance. |

8. Providing us with your personal data.

We require your personal data as it is a contractual requirement, or a requirement necessary to enter into a contract or to deal effectively with a query or complaint.

9. Your rights and your personal data.

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was your lawful basis for processing the data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the

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right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);

- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

10. Transfer of Data Abroad.

We do not transfer personal data outside the eea.

11. Automated Decision Making.

We do not use any form of automated decision making in our business.

12. Further processing.

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

13. Changes to our privacy policy.

Any changes we may make to our privacy policy in the future will be posted on our website and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy policy.

This document was last updated on 23rd May 2018.

14. How to make a complaint.

To exercise all relevant rights, queries or complaints please in the first instance contact our data protection officer on 01634 255694.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioners Office on 03031231113 or by writing to: Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.