

This version dated: 25 February 2021

At BPR CONSULTANCY we promise to safely process and store any personal data you share with us or that we receive indirectly as described below.

'Personal data' means information relating to you from which you can be identified such as name and contact details, biographical or professional information, areas of interest or anything revealing something about you personally that we may hold on file or on computer. We strive to ensure that we are clear about how we will use the personal data we collect. We collect and process your personal data in accordance with applicable laws that regulate data protection and privacy. Please read this Privacy Policy carefully to understand what personal data we collect, for what purpose and how we will treat it. From time to time we may change the way we use personal data and amend this Privacy Policy. Please check that you have seen the latest version.

1. Information we may collect from you

We may directly collect personal data from you through one or more of the following:

- By you registering for one of our events
- By you emailing or calling us with an enquiry
- By you entering your details through our website
- When your business card has been given to or exchanged with one of our staff

We may indirectly collect personal data about you in one or more of the following ways:

- Data is given to us by our partners, but only with your knowledge and, if legally required, where you have consented to this;
- If you provide your data to Media Subscription Services;
- If you are one of our followers on LinkedIn

If you provide your personal data to any other company that is acting independently of us, it is important that you read and understand their privacy policy or notice so that you are aware of how they will process your data.

2. Cookies

We may also collect information about your computer and your visits to our website, including, where available, your computer's IP address, geographical location, operating system, referral source, browser type, length of visit and number of page views. We do this using "cookies". Cookies are small pieces of information sent by our Website to the browser on the computer or device you use to access this Website. We may use this information to:

- To estimate our audience size and usage pattern
- To store information about your preferences, and so allow us to customise our site according to your individual interests
- To speed up your searches on our Website
- To recognise you when you return to our Website

You may refuse to accept cookies by closing the web browser or by activating the settings on your browser, which allows you to refuse the setting of cookies. However, if you select this you option may be unable to access certain parts of our Website or use all of its functionality.

What personal data do we collect?

The type and quantity of information we collect and how we use it depends on why you are providing it.

We will mainly collect:

- Your name
- Your contact details
- Where you work and/or other professional details (e.g. your publications)
- Any other information you wish to provide
- Any information which we require to enter and / or to fulfil a contract at your request.

4. How will we use your data?

We may use your data:

- To provide you with the services or information that you have requested from us
- To comply with applicable laws and regulations
- To manage and administer our legitimate activities as a provider of public relations, reputation management and corporate communications services
- To deal with your requests or enquiries
- To provide you with information about us, our services and our clients
- To keep a record of any communication from you or agreements with you that we hold
- To communicate with you about your registration for an upcoming event
- To invite you to relevant events
- We may share journalist details (name, publication and remit) with our clients to ensure journalists receive relevant invitations, information and news
- Other purposes that you may contact us about from time to time

5. How we keep your data safe and who has access to your information

We ensure that there are appropriate technical controls in place to protect your personal details from being accessed or used on an unauthorised basis or to protect them from accidental loss, destruction or damage.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff.

6. Disclosure of information

We may disclose your personal information to third parties in the following situations:

- to companies and/or organisations that act as our service providers, who handle that data on our behalf and in accordance with our instructions under contract. These include IT suppliers, data hosting providers, payment processors or agencies we use to conduct fraud checks;
- if we are under a duty to disclose or share your personal data to comply with any legal obligation or other statutory regulations we have to comply with;
- to enforce or comply with any agreements you have made with BPR Consultancy, for example, where we have to pass personal data to a party who is contracted to provide a service to you or to our lawyers or other professionals;

- to protect the rights, property, or safety of BPR Consultancy, or others. This includes exchanging information with other organisations for the purposes of protecting ourselves against fraud or safeguarding ourselves (or others) from criminal activity;
- if we are ever subject to a corporate merger or acquisition, although we will ensure your data is only ever used for the same purpose(s) for which it was originally collected.

We will only ever share your personal data with third parties to use for their own purposes in other circumstances with your prior knowledge and, if in connection with marketing, where we have your specific, informed, freely given and unambiguous consent. Any third party data controllers external to us with whom we deal, as described above, will handle your personal data in accordance with their own chosen procedures and you should check the relevant privacy policies of these companies or organisations to understand how they may use your personal data. Since these controller organisations are acting outside of our control, we have no responsibility for their data processing practices.

7. Keeping your information up to date

If we get in touch with you for any of the reasons above, we will give you the opportunity to correct and update your information. You can also contact us on pr@bpr.london at any time to let us know when your information needs correcting or updating.

Where a public source makes it clear that personal details we hold about you are out of date (e.g. a public announcement, press release or LinkedIn notification tells us that you have moved job), then we may use this information to update our records.

8. How long do we keep your information for?

The period for which we keep your personal data usually depends on the purpose(s) for which your information was collected.

We will not keep your personal data for longer than necessary for that/those purpose(s) or unless we need to keep data for a longer period to comply with any legal requirements.

BPR Consultancy has a data retention policy that sets out the different periods we retain personal data for in accordance with our duties under applicable data protection law. The criteria we use for determining our data retention periods are based on:

- various legislative requirements;
- the purpose for which we collected that personal data and where we have identified a continued legitimate need to hold that personal data to serve such purpose; and
- guidance issued by relevant regulatory authorities including, but not limited to, the UK Information Commissioner's Office (ICO).

Personal data that we no longer need to hold is securely disposed of and/or anonymised so you can no longer be identified from it.

9. Lawful basis for processing

We process your personal data for the above purposes relying on one or more of the following lawful grounds:

- where we agree to provide any product and/or service to you, in order to take any pre-contract steps at your request and/or to perform our contractual obligations to you;
- where we need to use your personal data for our legitimate interests of being able to provide public relations, reputation management and corporate communications services and manage our business in that regard. We will always seek to pursue these legitimate interests in a way that does not unduly infringe on your legal rights and freedoms and, in particular, your right of privacy;

- where you have freely provided your specific, informed and unambiguous consent to us using your personal data for particular purposes;
- where we need to protect your vital interests or those of someone else (such as in a medical emergency); and/or
- where we need to collect, process or hold your personal data to comply with a legal obligation.

If we process sensitive personal data (or “special category data”) about you such as data relating to health, ethnic origin, religious/philosophical or political beliefs, trade union membership or sex life, we will only do this with your explicit consent; or, to protect your vital interests or those of someone else; and/or, where you have clearly publicised such data; and/or, where we need to use such data in connection with a legal claim.

10. Your data rights

Under data protection law, you have a legal right to request information about the personal data that we hold about you, what we use that personal data for and who it may be disclosed to, as well as certain other information. Usually we will have one month to respond to such a subject access request, although in the case of complex requests, we may require a further two months to respond. We may also charge for administrative time in dealing with any manifestly unreasonable or excessive requests for access. We may also ask for further information to locate the specific information you seek before we can respond in full and may apply certain legal exemptions to some of the information we disclose when responding to a subject access request. You also have the following rights, which are exercisable by making a request to us in writing:

- that we correct personal data that we hold about you which is inaccurate or incomplete;
- to object to any automated processing (if applicable) that we carry out in relation to your personal data, for example if we conduct any automated credit scoring;
- to object to our continued use of your personal data for direct marketing;
- that we erase your personal data without undue delay and/or to object to and/or to restrict the use of your personal data by us for any purpose unless we have a legitimate reason for continuing to hold or process that data; or
- that we transfer your personal data to another party where the personal data has been collected with your consent or is being used to perform contract with you and we are processing that data by automated means (i.e. on computer).

All of these requests may be forwarded on to a third party data processor who is involved in the processing of your personal data on our behalf.

11. Contact or Complaints

If you would like to exercise any of the above rights or if you have any concerns about how we use your personal data, please contact us by e-mail at: pr@bpr.london.

When you make any request, you may be required to provide us with appropriate evidence so that we can verify your identity before we can respond.

If you make a request and are not satisfied with our response, or believe that we are illegally processing your personal data, you have the right to complain to the UK Information Commissioner’s Office (ICO).