

GDPR Privacy Policy

At Compass Media Relations Ltd we take protection of your personal information very seriously. It is important to us that we are transparent to our clients, prospective clients, visitors to our website and professional connections, regarding our collection and use of personal information.

In this privacy policy we tell you what information we collect, how we use this information and what your rights are in respect of your personal information whether you are a visitor to our website, contact us to enquire regarding the services we offer, engage us to perform services or whether you are a business connection.

When we talk about personal information we are only referring to information from which an individual person can be identified.

Please read this policy carefully. If you have any queries regarding its contents or any personal information we may hold relating to you then please do not hesitate to contact the Data Protection Officer, James Davies, in one of the following ways:

- Email address: hello@compassmr.co.uk
- Postal address: St Brannoks, 60 Preston Avenue, Newport, CF10 5EQ
- Telephone number: 01633 972 986

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

Information we collect

Information we collect and use includes your name, business address, telephone numbers, email address and

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric information). Nor do we collect any information about criminal convictions and offences.

How we collect your information

We may collect personal information in the following ways:

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Our website

Our website enables you to contact us with an initial enquiry. Where you use our 'contact us' facility we will ask you for your name, email address and a brief summary of your enquiry.

As you interact with our website, we may automatically collect information about your equipment, browsing actions and patterns. We collect this personal information by using cookies and other similar technologies.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share information about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Direct contact

You may give us your name, address, telephone numbers and email address when you contact us by either email, telephone or post to enquire about our services or if you supply us with contact details or your business card at a networking event or other meeting.

Service delivery

If you engage us to perform services we will need to register you as a client and for this purpose we will need you to provide your name, address, telephone numbers, email address, date of birth, bank account and/or payment card details together with information relating to your business. This information may be used in the delivery of our services. We may also require additional information which includes personal information depending on the nature of the services to be provided e.g. customer database, friends and family. We will advise you what information and why such information is required upon you engaging us or at the relevant time the information is requested.

Third parties

We may receive information about you from third parties e.g. from a supplier engaged to provide services to you and which services interact with the services we deliver or from a business connection or client who has recommended our services to you. We may further collect personal information about you from publicly available sources such as Companies House.

How we use your personal information

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We will use the personal information we collect for the following purposes:

- to reply to any general enquiry you make and to provide you with information regarding the services we offer.
- to perform the contract for services between us and to carry out any actions you have requested prior to entering into the contract e.g. providing you with a quotation.
- to manage our relationship with you.
- to comply with our legal and regulatory obligations.
- to undertake credit checks and any checks we deem necessary to confirm your identity.
- to introduce you to or engage the services of third party service providers whose services are required in connection with the provision of the services we will provide.
- to deal with any client feedback or complaint you may make.
- to administer, develop and improve our business.
- to protect our business e.g. should it be necessary to commence debt recovery actions or defend any legal claim.
- to make suggestions and recommendations to you about the services we offer which may be of interest to you.
- to invite you to any hospitality, training or networking events we may hold or of which we may be a party which may be of interest to you.
- to facilitate an introduction of a client to a business connection where the client requires the services of the relevant business connection.

We must have a lawful reason for processing your personal information. Most commonly, we will use your personal information in the following circumstances:

- where we need to perform the contract for services we are about to enter into or have entered into with you.
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- where we need to comply with a legal or regulatory obligation.
- where you have given your consent to process your personal information.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

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If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Marketing

We strive to provide you with choices regarding certain personal information uses, particularly around marketing and advertising. We will get your express opt-in consent before we share your personal information with any other organisation for marketing purposes.

You can ask us to stop sending you marketing messages at any time by contacting us by one of the contact methods stated above or by following the opt-out links on any marketing message sent to you. Where you opt out of receiving these marketing messages, this will not apply to personal information provided to us as a result of the provision of services, your service experience or the historic supply of services.

Sharing your personal information

In certain circumstances we may need to share your personal information with:-

- third party service providers whose services are required to enable you to take the benefit of the services we are providing e.g. Mailchimp, Google Drive, your email provider.
- to those third party suppliers who provide administrative and support services to us e.g. provider of cloud software used in our business, credit reference agencies.
- Our professional advisers including lawyers, insurers and accountants.
- HM Revenue and Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal information in the same way as is set out in this policy.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

Certain of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal information will involve a transfer of information outside the EEA.

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Whenever we transfer your personal information out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal information to countries that have been deemed to provide an adequate level of protection for personal information by the European Commission. For further details, see European Commission: Adequacy of the protection of personal information in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal information the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal information to third countries.
- Where we use providers based in the US, we may transfer information to them if they are part of the Privacy Shield which requires them to provide similar protection to personal information shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Information security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Information retention

How long will you use my personal information for?

We will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

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In some circumstances you can ask us to delete your information: see Request erasure below for further information.

In some circumstances we may anonymise your personal information (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your legal rights

You have the right to:

Request access to your personal information (commonly known as a “information subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected, though we may need to verify the accuracy of the new information you provide to us.

Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal information. This enables you to ask us to suspend the processing of your personal information in the following scenarios: (a) if you want us to establish the information’s accuracy; (b) where our use of the information is unlawful but you do not want us to erase it; (c) where you need us to hold the information even if we no longer require it as you need it to

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establish, exercise or defend legal claims; or (d) you have objected to our use of your information but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal information to you or to a third party. We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us using the contact details stated above.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

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