

Messages PR Ltd.
GDPR Compliance

Our Data Policies



Freemasons' Hall
13 Station Road
Moretonhampstead
Devon TQ13 8NQ

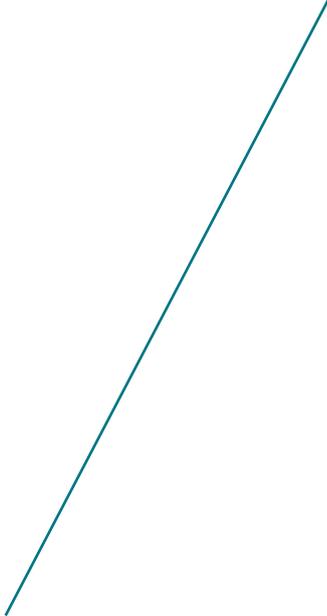
Tel: (01647) 277588/9

www.messagespr.co.uk

Revised: 3/05/2018

 **messagespr**
Targeted Marketing

Who we are



We are a marketing company that organise events and promotions in shopping centres and town centres throughout the UK. To facilitate these activities, we will often collect information about members of the public who participate. This will generally be instigated to enable contact with the winners of competitions and to guarantee consent where we may use pictures of participants on social media.

This data collection will always be clearly identified and the information we collect will only ever be used within the remit of the activity to which the public are invited. Our events are run to entertain and engage shoppers and visitors and we are careful not to undermine the trust of everyone involved.

Many of our activities are run through social media, such as Facebook, and in these instances, the extent to which your data is visible to us will be defined by the privacy settings which you have set on your own account.

We never bill the public on-line for the services we offer nor do we collect any payment details from the public.



1. Introduction

This Privacy Notice explains in detail, the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data, and keep it safe. We know that there's a lot of information here, but we want you to be fully informed about your rights, and how Messages PR uses your data. For example, we will explain things such as our policy for collecting and storing data consent in situations where we have photos taken at our events.

We hope the following sections will answer any questions you have but if not, please do get in touch with us. It's likely that we'll need to update this Privacy Notice from time to time. We'll notify you of any significant changes, but you're welcome to come back and check it whenever you wish.

2. Explaining the legal bases we rely on

We collect and manage data in accordance with the most recent EU and UK law, specifically the GDPR (General Data Protection Regulation), as set out for inclusion within UK law in May 2018.

Prior to this legislation, we were already licensed to collect and hold data via our registration reference number Z5291074 which can be seen on ICO.org.uk (This is linked to the registered address of the Limited Company as recorded at Companies House.)

The law on data protection sets out a number of different reasons for which a company may collect and process your personal data, including:

Consent

This data is collected by us on behalf of our clients. In specific situations, we can collect and process your data with your consent. For example, when you fill out an entry form for one of our competitions. Giving your consent is always at your discretion; we do not assume your consent by default or use pre-ticked boxes, and you can withdraw your consent at any time. For more information on withdrawing consent, please see section 9 of this policy. A lot of our competitions and events are aimed at children. In such cases, we will always ensure we get parental consent from a parent or guardian before proceeding any further with their entry in a competition or any data we may possess on the child in question.

When collecting your personal data, we'll always make clear to you which data is necessary in connection with a particular service. We keep our consents under review and refresh them if anything changes.

Legal Obligation

If the law requires us to, we may need to collect, process and store your data. For example to ensure we have the right to publish pictures.

Legitimate interest

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests.

For example, we may review the Post Codes of participants in events to provide us with a guide as to the locations from whence our shoppers are drawn.

We will NOT use your address details to send you direct marketing information by post or email.

3. When do we collect your personal data?

- When you fill out an entry form for one of our competitions, such as Modelsearch.
- When you fill out a consent form, allowing us to publish photos of you on our Social Media pages and websites.
- When you engage with us on social media.
- When you contact us by any means with queries, complaints etc.
- When you enter prize draws or competitions.
- When you book any kind of appointment with us or book to attend an event, for example a tea party in the Centre or a visit to Santa.
- When you choose to complete any surveys we send you.
- When you comment on or review our centres and services.
- When administering events open to those aged under 16, we will, in all circumstances, only proceed where we have consent from a parent or guardian.

4. What sort of personal data do we collect?

- If you enter one of our competitions, we may collect your name, gender, date of birth, address, email address, telephone number and signature.
- Your image may be photographed for some of our competitions.
- To deliver the best possible web experience, we collect technical information about your internet connection and browser as well as the country and telephone code where your computer is located, the web pages viewed during your visit, the advertisements you clicked on, and any search terms you entered
- Your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback.
- Under no circumstances do we charge members of the public on-line for participation in any event and though some Christmas Grottos may incur a cost, the money will be taken in cash at the time of the admission.
- We will never ask for payment details and any request for bank or card details purporting to be related to our events must be reported to ourselves immediately.
- We also collect data relating to organisations within the catchment of centres where we work. In some instance this may include the names of relevant officials. For example, local schools or dance clubs.

5. How and why do we use your personal data?

We use your personal data to contact you regarding events you have participated in and that we have organised on behalf of our clients. We only use the data on behalf of the specific clients and will only contact you within the context of the activity you took part in.

Of course, if you wish to change how we use your data, you'll find details in the 'What are my rights?' section 9 below. Remember, if you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide some services you've asked for.

Here's how we'll use your personal data and why:

- To respond to any queries, and complaints. Handling the information you sent enables us to respond. We may also keep a record of these to inform you of any future communication with us and to demonstrate how we communicated with you throughout. We do this on the basis of our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience.

Of course, you are free to opt out of hearing from us by any of these channels at any time.

- To send you relevant, personalised communications by post in relation to updates, offers, services and products. We'll do this on the basis of our legitimate business interest.
- To administer any of our prize draws or competitions which you enter, based on your consent given at the time of entering.
- To comply with our contractual or legal obligations to share data with law enforcement.
- To process your booking/appointment requests (for example a visit to Santa). Sometimes, we'll need to share your details with a third party who is providing a service (such as the events team running a programme). We do so to maintain our appointment with you. Without sharing your personal data, we'd be unable to fulfil your request.

6. How we protect your personal data

We know how much data security matters to all our customers. With this in mind, we will treat your data with the utmost care and take all appropriate steps to protect it.

When you fill out an entry form for a competition via written form or tablet or sign a consent form at one of our client locations, these are then despatched by Royal Mail Special Delivery or courier to our office, where we collate the forms and store them in a locked drawer, which can only be accessed by authorised personnel. Should we need to contact you by post concerning a competition you have entered, we will transfer the information you have provided into an Excel spreadsheet. These spreadsheets are all password protected.

Any photos we collect are stored on a private server that is, again, password protected.

7. How long do we keep your personal data?

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected.

At the end of that retention period, your data will be deleted completely. For hard copies of information you provide us, we dispose of through secure confidential destruction, which is carried out by Paperchain Co-operative. For more information on how they operate and their services, please visit www.paperchain.org.uk. We receive a Confidential Waste Transfer Note upon collection of the information, as well as a Certificate of Destruction when the process has been completed.

An example of our data retention periods:

Modelsearch Entry Forms

Modelsearch is a nationwide competition we run every 18 months across a number of shopping centres. Thousands of people from the age of 4 and above are able to enter, and each entrant must fill out an entry form. We use these to notify successful entrants about the following stages of the competition, the final stage of which is usually around 10 months after they initially entered.

For this purpose, all entry forms are stored securely in the office until the final stage has been completed and we are certain that we will no longer need to contact the entrants. The forms are then securely disposed of as detailed above.

Children's Clubs

For some clients, we run family activity clubs for children where we collect data so we can mail or email their parents or guardians to announce forthcoming events. The details of members are all collected with a parental consent incorporated and correspondence is limited to the parameters of the club activity. We collect the child's date of birth and the data is removed when the children reach the age of 11.

8. Who do we share your personal data with?

At Messages PR, we only use the data we receive for the administration of specific events for this information has been requested.

We would only share your data with the centres for which we have organised any event and these centres will not use this data for any other purpose beyond the requirements of the specific event.

9. What are your rights over personal data?

An overview of your different rights

You have the right to request:

- Access to the personal data we hold about you, free of charge in most cases.
- The correction of your personal data when incorrect, out of date or incomplete.
- For example, when you withdraw consent, or object and we have no legitimate overriding interest, or once the purpose for which we hold the data has come to an end (such as the end of a competition we have been running).
- That we stop any consent-based processing of your personal data after you withdraw that consent.
- You have the right to request a copy of any information about you that Messages PR holds at any time, and also to have that information corrected if it is inaccurate.

We are committed to responding to such requests within one month.

If we have not responded within two weeks, we request you call our office on 01647 277588 to expedite the action you require.

To ask for your information or for your information to be amended, please contact

Messages PR, Freemasons' Hall, 13 Station Road, Moretonhampstead, Devon, United Kingdom. TQ13 8NQ or email mick@messagespr.co.uk.

If we choose not to action your request, we will explain to you the reasons for our refusal.

Your right to withdraw consent

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

Where we rely on our legitimate interest

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

Checking your identity

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

10. Contacting the Regulator

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling 0303 123 1113

Or go online to www.ico.org.uk/concerns (opens in a new window; please note we can't be responsible for the content of external websites).

11. Data Breaches

In the event of a breach in our data policy.

Detect – If we detect a data breach or are notified of a breach, we will take immediate action to both remedy the breach and also put measures in action to prevent further breaches. Should there be a risk to the rights and freedoms of individuals, we will also alert the ICO (Information Commissioner's Office).

Inform – We will respond to any individual identifying the breach and also contact the client for whom we are acting. Should the individual breach have repercussions to other people for whom we hold data, these individuals will be contacted in a timely fashion.

Investigate – A full impact review will be made of the failures in our process that have led to any breach and these will be shared with the affected parties and, if necessary, alterations be made to this policy document.

Policy Review

We have familiarized ourselves with ICO (Information Commissioner's Office) advice and recommendations and these are enshrined within this document.

The policy stated in this document was created in April 2018 and will be reviewed in May 2019 or as any subsequent legislation is implemented.

12. Any questions?

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it.

If you have any questions that haven't been covered, please contact our Data Protection Officer who will be pleased to help you:

- Email us at mick@messagespr.co.uk
- Or write to us at Messages PR at Messages PR Ltd, Freemasons' Hall, 13 Station Road, Moretonhampstead, Devon, TQ13 8NQ
- The Data Protection Officer concerned with these policies is Michael Prosser BA who works from our Devon Office and can be contacted on 01647 277588.
- This notice was last updated on 3/05/2018
- Access to this policy is held on our website via www.messagespr.co.uk/GDPR.pdf
- This link is applied to entry forms and data consent material we create on behalf of our clients.
- Where activities are run via social media, we will also apply a link to the specific link published on the relevant social media website.
- Our ICO data registration reference number Z5291074

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