

# MediaClash data privacy policy, May 2018

## Principles for all data:

All data is held secure and access strictly limited to those who have specific business need.

No data is shared by MediaClash with any third party save only for statutory or legal purposes, including but not limited to HMRC and debt collection agencies.

No email addresses are shared with third parties. For the avoidance of doubt, our emails are sent via our marketing automation platform Campaign Monitor and are subject to its separate privacy policy.

Client data is held on a FileMaker CRM system and is subject to its separate Privacy Policy.

All MediaClash employees have confirmed in writing that they hold Third Party Data confidential. MediaClash's co-owner and director, Greg Ingham, is the company's Data Controller, which means that he has the responsibility for keeping your personal data safe, for using it lawfully, and for ensuring your rights to privacy are respected.

This data privacy policy is reviewed annually ahead of the start of MediaClash's financial year in April.

## 1. Internal data

### Employees & Freelances

*Employee in this context means any full-time, part-time person working for and/or supplying services to MediaClash and/or Creative Bath.*

*Freelances means a person working for and/or supplying services to MediaClash and/or Creative Bath on an occasional and/or project basis.*

MediaClash holds data (DOB, postal and email address, salary, bonus/commissions, NICs, pension information, next of kin and employment history) on all current employees and on ex-employees for a period of six tax years prior to the current tax year. The same applies to Freelances.

This data is held on a secure part of the MediaClash server, accessible only by the Directors Jane Ingham and Greg Ingham, and our Finance Director Clive Hoskin (and later in 2018, by his successor).

This data is held for employee record purposes only. It is not shared with any third party beyond HMRC and NEST.

Your records can be viewed upon request. We are happy to correct any errors. Ex-employees may request their records be removed only if it exceeds the minimum retention period required by HMRC. This is currently for the three tax years prior to the current tax year plus the current tax year.

Additionally, we hold HR Employee records including but not limited to Appraisal documents. These can also be viewed by the relevant individuals.

## **2. Supplier Data**

Supplier data is held strictly for commercial purposes.

The data includes: contacts (email, phone, address); bank account details; and commercial transaction histories. The data is held on SAGE 50 accounts. Access to this is limited to a strictly-controlled and specified number of employees of MediaClash who have consented in writing not to share or retain any of the information held.

## **3. Client data**

Client data is held strictly for MediaClash's legitimate business interest. This includes advance awareness of editorial features to gain coverage; the selling of advertising, sponsorship, events' tickets, publishing services; and information directly relating to both areas thereto.

The data includes: contacts (email, phone, address) and commercial transaction histories.

The data is collected by account managers and held on Filemaker and/or SAGE 50 accounts. Access to this is limited to specified employees of MediaClash who have consented in writing not to share or retain any of the information held.

Some sales are made direct via Eventbrite and PayPal; in neither case does MediaClash have access to financial records of the companies or individuals who have purchased in this way.

Email data via both routes is covered below.

## **4. Email lists**

Email lists are retained and updated on the basis of companies or individuals who have a legitimate business interest with MediaClash, as above.

No emails are supplied to third parties. Nor do we rent/sell out our lists or make them available or give access in any way. For the avoidance of doubt, MediaClash and Creative Bath uses Campaign Monitor as our marketing automation platform. Its [Data Processing policy can be found here](#) and its [privacy and general policy terms are here](#).

No lists of emails are shared internally. Access is strictly limited to the Events and Marketing team who have consented in writing not to share or retain any of the information held.

In order to effectively run competitions, email addresses will be collected and stored for the duration of the competition length. Upon completion, a winner will be contacted using this data and all other personal data will be deleted at this time from our servers. Only those who

have positively opted-in to receive further communications during the competition will be contacted further.

All recipients of our emails have a clear option to Unsubscribe on all emails. We alert all recipients to this option annually. Upon un-subscription, all personal data is removed from the relevant email list database.

## **5. Websites**

MediaClash and Creative Bath's websites have links to our social media pages and accounts. We don't collect any personal data through these links.

### **i) Websites and email marketing**

MediaClash and Creative Bath's websites and email marketing allows you to sign-up to our related newsletter by providing your name, email address and business (where relevant).

### **ii) Web statistics**

iii) We collect web statistics automatically about your visits to our sites based on your IP address. This information is used to help us track what people are doing on the site so that we can improve it. We don't use this information to identify you as an individual and you will remain anonymous, unless you identify yourself by completing a form or an online transaction. We use Google Analytics for this purpose, and your IP address will be deleted from the Google server after three years. Google's privacy statement is [here](#).

## **6. Cookies**

We sometimes store small files called cookies on your computer or other device to help improve your experience on the website. Our cookies cannot be used to identify you personally.

MediaClash utilises third party cookies also: [www.crumbsmag.com/policy/](http://www.crumbsmag.com/policy/)

These include social tracking cookies to allow for remarketing and retargeting as well as ad networks such as Google AdSense.

### **iv) How long will we keep your personal data?**

Information which cannot identify you will be retained after your participation has ceased and will be used only for statistical and research purposes.

Information which can identify you will be retained for a maximum period of five years.

## **7. Your rights**

Under the General Data Protection Regulation 2018 (GDPR) and The Data Protection Act 2018 (DPA) you have various rights concerning your personal data. You have the right to request from us access to and rectification or erasures of your personal data, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability.

If you have provided consent for the processing of your data you have the right to withdraw that consent at any time, which will not affect the lawfulness of the processing before your consent was withdrawn.

You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the GDPR or DPA 18 with regard to your personal data.

If you wish to see the information we hold about you, please make a Subject Access Request.

If you have any concerns or questions about our handling of your personal data, wish to submit a Subject Access Request or wish to withdraw your consent for the processing of your data, please contact:

**Greg Ingham**

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