



MAKING IT HAPPEN

PR Genie - Privacy Policy (GDPR)

Version 1.0 | Dated: 24 May 2018

Glossary of Terms

What is 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.

This definition provides for a wide range of personal identifiers to constitute personal data, including name, identification number, location data or online identifier, reflecting changes in technology and the way organisations collect information about people.

What is sensitive personal data?

The GDPR refers to sensitive personal data as "special categories of personal data".

The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual.

Personal data relating to criminal convictions and offences are not included, but similar extra safeguards apply to its processing.

What is a Data Controller?

For general data protection regulation purposes, the "data controller" means the person or organisation who decides the purposes for which and the way in which any personal data is processed.

What is a Data Processor?

A "data processor" is a person or organisation which processes personal data for the controller.

What is Data Processing?

Data processing is any operation or set of operations performed upon personal data, or sets of it, be it by automated systems or not. Examples of data processing explicitly listed in the text of the GDPR

are: collection, recording, organising, structuring, storing, adapting, altering, retrieving, consulting, using, disclosing by transmission, disseminating or making available, aligning or combining, restricting, erasure or destruction.

What information do we collect about you and how?

PR Genie, as a Data Controller, is bound by the requirements of the General Data Protection Regulations (GDPR).

You agree that we are entitled to obtain, use and process the information you provide to us to enable us to discharge the Services as contracted

We collect information about you when you fill in any of the forms on our website ie sending an enquiry, signing up for an event, filling in a survey, giving feedback etc. Website usage information is collected using cookies.

When submitting forms on our website we use a third-party software provider for automated data collection and processing purposes, they will not use your data for any purposes and will only hold the data in line with our policy on data retention.

Cookies are text files put on your computer to collect standard internet log information and visitor behaviour information. This information is then used to track visitor use of the website and to create statistical reports on website activity.

You can set your browser not to accept cookies if required

Analytics – e.g. how visitors use our website

We reserve the right to use third party Analytical software to store information about how visitors use our website so that we may make improvements and give visitors a better user experience.

These cookies do not store any personal information about you eg name, address etc and we do not share the data. You can view their privacy policy below:

IP addresses - An IP or Internet Protocol Address is a unique numerical address assigned to a computer as it logs on to the internet. PR Genie do not have access to any personal identifiable information and we would never seek this information. Your IP address is logged when visiting our site to and only track how many visitors we have from particular regions.

Internet Based Advertising - We use LinkedIn, Facebook and Twitter advertising services, these services are used solely for product advertising and as such will not contain any personal identifiable information.

How will we use the information about you and why?

At PR Genie we take your privacy seriously and will only use your personal information to provide the Services you have requested from us. We will only use this information subject to your instructions, data protection law and our duty of confidentiality.

For Business to Business Clients and Contacts our lawful reason for processing your personal information will be “legitimate interests”. Under “**legitimate interests**” we can process your personal information if: we have a genuine and legitimate reason and we are not harming any of your rights and interests.

Article 6(1)(f) of the GDPR permits a ‘legitimate interests’ basis for processing where “processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.”

This basis is broken down into a three-part test which we apply:

1. **Purpose Test:** are you pursuing a legitimate interest?
2. **Necessity Test:** is the processing necessary for that purpose?
3. **Balancing Test:** do the individuals interests override the legitimate interest?

The GDPR specifically mentions use of client or employee data, marketing, fraud prevention, intra-group transfers, or IT security as potential legitimate interests.

PR Genie specialise in designing and delivering PR Campaigns for the fashion and entertainment industry. In order to carry out these campaigns we retain Journalists and freelancers contact information. We segregate the contacts by the subject the journalist is interested in, then group these by category (e.g. Monthly publications / weekly publications)

The information retained per contact is:

Full Name, Job Title, Email Address, Phone Number, Work Address

We will not share your information for marketing purposes with companies so that they may offer you their products and services.

We also subscribe to two third Parties that supply us with PR contact information on a monthly basis. These companies are:

ResponseSource Ltd - <https://www.responsesource.com/>

Kantar Media - <https://www.kantarmedia.com/uk>

We have received confirmation that both the above companies are GDPR compliant.

If when assessing personal data, the three-part test is not met for 'legitimate interests' purposes we will always seek consent prior to retaining contact information.

Security precautions in place for retained data

Security is of prime importance to us and as such PR Genie uses Dropbox to hold all contact information. No 'local' copies of the contact information exist on Laptops or Desktops. Access to dropbox provides a secure 'offsite' location.

How does Dropbox comply with GDPR?

- Trust is the foundation of our relationship with millions of people and businesses around the world. We value the confidence you've put in us and take the responsibility of protecting your information seriously.
- Dropbox places the utmost importance on data protection and has a track record of staying ahead of the compliance curve - for example, we were one of the first cloud service providers to achieve ISO 27018 — the internationally recognised standard for leading practices in cloud privacy and data protection.
- Dropbox's Legal, Trust, and Privacy teams have carefully analysed the GDPR and are undertaking the necessary steps to ensure that we comply.
- We will meet the requirements of the GDPR by 25 May 2018.

Marketing

We would like to send you information about our services which may be of interest to you. If you have consented to receive marketing, you may opt out at any point as set out below.

You have a right at any time to stop us from contacting you for marketing purposes. To opt out please email: privacy@prgenie.co.uk

Access to your information, correction and deletion

What is a Subject Access Request?

This is your right to request a copy of the information that we hold about you. If you would like a copy of some or all your personal information, please email or write to us at the following address: Jean Ralph, Director, PR Genie, 62 Gorham Drive, St Albans, AL1 2HP. We will respond to your request within one month of receipt of the request.

We want to make sure your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate by emailing privacy@prgenie.co.uk or writing to the above address.

Linked websites

Our website may contain links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

Complaints

If you feel that your personal data has been processed in a way that does not meet the GDPR, you have a specific right to lodge a complaint with the relevant supervisory authority. The supervisory authority will then tell you of the progress and outcome of your complaint. The supervisory authority in the UK is the [Information Commissioner's Office](#).

Changes to our Privacy Policy

We keep our privacy policy under regular review and we will place any updates on our website, www.prgenie.co.uk. This privacy policy was last updated on 24th May 2018 and the Version number is 1.0 in line with the new GDPR guidelines.

How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you:

- By email: privacy@prgenie.co.uk
- Or write to us at Jean Ralph, Director, PR Genie, 62 Gorham Drive, St Albans, AL1 2HP.