

## Privacy policy

### 1. Introduction

- 1.1 We are committed to safeguarding the privacy of our contacts.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of Clover PR's contacts; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 In this policy, "we", "us" and "our" refer to Clover PR Ltd. For more information about us, see Section 13.

### 2. Use of personal data

#### 2.1 Email Policy

We may process contact data ("**contact data**") - our legal basis for the processing of this data is our **legitimate business interests**.

The contact data may include your name, email address and phone number. The source of the account data is either direct from you or via our media database provider Vuelio. The contact data may be processed for the **legitimate business interests** purposes of sharing relevant press releases, feature submissions, late deals or press trip invitations with you. The legal basis for this processing is you sharing your contact details with us requesting being kept up to date on our clients' news, or your inclusion on the Vuelio media database.

- 2.2 We do not send direct marketing or any communication to our contacts other than for legitimate business interests.

### 3 Providing your personal data to others

- 3.1 We will not disclose your contact data to any third party with the exception of our client for the sole purpose of press trip organisation once you have confirmed you will work with our client on a press trip.

### 4. International transfers of your personal data

- 4.1 Our clients work with ground handling agents across the world. The only occasion on which we would share your contact details with them would be for the sole purpose of press trip organization once you have confirmed you will work with our client on a press trip.

### 5. Retaining and deleting personal data

- 5.1 This section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 5.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 5.3 We will retain your personal data as follows:

- (a) *Contact data* for sharing clients' news (where you have requested we send you information) will be retained for an ongoing period
- (b) *Contact data* for sharing clients' news (where we have gathered the data from media database Vuelio) will be retained only on the Vuelio system and not held on our systems
- (c) *Contact data* for press trip organization will be retained for a period of six months after the article has been published unless you have asked us to stay in contact through method (a) or your details are available on the external database referenced in (b)

5.4 Notwithstanding the other provisions of this Section, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## **6. Amendments**

- 6.1 We may update this policy from time to time by publishing a new version on our website.
- 6.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

## **7. Your rights**

7.1 In this Section, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

7.2 Your principal rights under data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

7.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee. You can request the contact data we hold on you by emailing [chloe@cloverpr.co.uk](mailto:chloe@cloverpr.co.uk)

- 7.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.
- 7.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.
- 7.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
- 7.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- 7.8 To the extent that the legal basis for our processing of your personal data is:
- (a) consent; or
  - (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,
- and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- 7.9 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

7.10 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

7.11 You may exercise any of your rights in relation to your personal data by written notice to us in addition to the other methods specified in this Section ].

## **8. Our details**

8.1 Clover PR Ltd. is registered in England and Wales under registration number 10591358

8.2 You can contact us:

(a) by telephone, on the contact number published on our website

(b) by email, using the email address published on our website

## **9. Credit**

9.1 This document was created based on a template from SEQ Legal (<https://seqlegal.com>).