

PRIVACY POLICY

Marcus Stanton Communications takes your privacy seriously and treat all the personal data you give us with great care. Our Privacy Policy explains how we collect, store and use the personal data you give to us. We will keep this page updated so that you can be confident when sharing your data with us that it will only be used in accordance with this policy.

We are committed to protecting the privacy of all of our clients, suppliers and contractors and employees and those whose personal data is retained by Marcus Stanton Communications.

This Privacy Policy applies to the marcusstantoncommunications.co.uk website

CONTROLLER

Marcus Stanton Communications is the controller and responsible for your personal data (collectively referred to as "Marcus Stanton", "we", "us", or "our" in this privacy notice).

We have appointed a GDPR and data protection liaison officer (DPLO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPLO using the details set out below.

CONTACT DETAILS

Our full details are:

Full name of legal entity: Marcus Stanton Communications

Name and title of DPLO: Marcus Stanton

Email address: marcus@marcusstanton.co.uk

Telephone number: 020 8617 0210

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

We will do our best to ensure that the information in this notice and on our website is current and accurate. If you have reason to believe that it is not please do contact us urgently so that we can redress the situation.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

The data protection law in the UK will change on 25th May 2018. This privacy notice sets out most of your rights under the new laws. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

TYPES OF DATA COLLECTED

Commonly there are certain types of data which can be collected from you on websites.

Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website. We do not collect this sort of data from you on our website.

Usage Data includes information about how you use our website. This information is collected from you anonymously through Google Analytics and Tools to help us understand whether our website is answering your questions and for the purposes of us understanding how effective our website is.

Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, your Usage Data could be aggregated to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice. We do not process aggregated data on this website.

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 data). Nor do we collect any information about criminal convictions and offences.

THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed.

We process personal data about you that you give to us when you instruct us such as your name, postal address, email address, telephone numbers and financial information relating to your matter.

We do not process any personal data on our website. We anonymously keep track of those who visit our website and we keep no data from those who use our contact form. We do not use cookies.

We do use Google Analytics and Tools, which keeps anonymous data about who visits our websites and what pages they look at.

On our website we also have a contact form so that you can easily contact us. However this does not store your information. It is only a conduit through which you can easily email us.

HOW IS YOUR PERSONAL DATA COLLECTED

Different methods can be used on websites to collect data from and about you including through:

Automated technologies or interactions. We do not collect this type of data from you on our website.

Third parties or publicly available sources. We may receive Technical Data from analytics providers such as Google based outside the EU. This is all anonymous and contains none of your personal data.

Usage Data includes information about how you use our website, again collected anonymously.

HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. We are allowed to process your personal data either under contract if you have a retainer with us or we have some other sort of contract with you; or due to our or a third party's legitimate interests to enable us to carry out your instructions or to comply with our legal obligations (such as under the Anti-Money Laundering legislation or Proceeds of Crime Act).

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

At Marcus Stanton Communications we are committed to protecting your privacy. Set out below is an explanation of how we use information about visitors to this site.

1. We may use your Usage Data and information collected from third parties to deliver relevant website content to you and measure or understand the effectiveness of the content. Such use would be necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform market strategy).
2. We may use your Usage Data and information collected from third parties to use data analytics to improve our website, services, marketing, customer relationships and experiences. Such use would be necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).

MARKETING

We do not market our service by electronic means and therefore we do not have a separate policy with regard to the Privacy and Electronic Communications Regulation (2003).

CHANGE OF PURPOSE

We will only use your personal data 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*.

If we need to use your personal data 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 data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

DISCLOSURES OF YOUR PERSONAL DATA

Any information collected on our website is shared only with the administrator of this website, who is required to respect your personal data and to treat it in accordance with the law and with this policy.

INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area (EEA).

7. DATA SECURITY

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

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

DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil 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 data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under the data protection laws in relation to your personal data. Your rights are listed below, and more detail can be found in the glossary below:

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

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

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (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 data (or to exercise any of your other rights). This is a security measure to ensure that personal data 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

In normal circumstances we will respond to your requests under the data protection laws within 1 month. This time limit may be extended by up to 2 further months if there are complex or numerous requests.

GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted by law). You can obtain further information about how we assess our legitimate interests against any particular impact on you in respect of specific activities by *contacting us*.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

EXTERNAL THIRD PARTIES

- Service providers acting as processors based in the UK who provide IT and system administration services.
- Professional advisers acting as processors including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue and Customs, regulators and other authorities acting as processors based in the UK who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

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

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

Request erasure of your personal data. This enables you to ask us to delete or remove personal data 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 data 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 data 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 data 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 data 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 data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data 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 information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. 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 services to you. We will advise you if this is the case at the time you withdraw your consent.

Last Reviewed: 21st February 2020