



JFG Communications Ltd – Data Privacy Policy

Introduction

JFG Communications Ltd is committed to protecting and respecting your privacy. We aim to be open, honest and transparent about how we collect and process your data.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the “GDPR”).

1. Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person

Categories of data: Personal data and special categories of personal data

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 (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories of personal data - The GDPR refers to sensitive personal data as ‘special categories of personal data’ (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

Jo Field is the data controller. This means we decide how your personal data is processed and for what purposes. Please contact Jo Field on info@jfgcomms.co.uk for all data matters.

3. The purpose(s) of processing your personal data

We use your personal data for the following purposes:

- Managing relationships with our stakeholders, either for our own business purposes or on behalf of our clients
- Delivering and evaluating campaigns and research on behalf of our clients
- Registering and invoicing our customers
- Registering and paying our suppliers

4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

- Personal data such as contact information, opinion information or financial information

We do not process special categories of personal data.

5. What is our legal basis for processing your personal data?

a) Personal data (article 6 of GDPR)

Our lawful basis for processing your general personal data:

We will only use your personal data when the law allows us to either because we have a legitimate interest in processing it or because we have received active consent to do so.

Most commonly, we will process your general personal data where it is necessary for the purposes of the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject.

We define a legitimate interest as the interest of our business in managing our commercial operations and conducting our business as a communications and public relations consultancy.

6. Visiting our website

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

We also use Google Analytics to provide us with non-personalised information on the use of our website. We use this information to improve our site.

Our website is not intended for children and we do not knowingly collect data relating to children.

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

When you leave our website, we encourage you to read the privacy notice of every website you visit.

7. Sharing your personal data

Your personal data will be treated as strictly confidential. However we may have to share your data with the parties set out below for the purposes below:

- Professional advisers such as auditors and insurers providing accounting and insurance services and acting as joint processors of your data

We may also share your data with our clients, as we collect data on behalf of our clients where we have active consent from the individual concerned or a legitimate interest to do so.

As an example, we build stakeholder lists of personal data such as contact information of named individuals in organisations, journalists and elected representatives. We do this where we think there is a legitimate interest in providing stakeholders with information on a specific campaign or initiative on behalf of our clients.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

8. How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary in order to satisfy the purposes it was collected for, including satisfying any legal, accounting or reporting requirements.

9. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you
- The right to request that we correct any personal data if it is found to be inaccurate or out of date
- The right to request your personal data is erased where it is no longer necessary to retain such data
- The right to withdraw your consent to the processing at any time, where consent was our lawful process for processing the data
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability)
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing
- The right to object to the processing of your personal data

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 admin fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

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.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Transfer of Data Abroad

We do not transfer personal data outside the EEA.

11. Automated Decision Making

We do not use any form of automated decision making in our business.

12. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

13. Failure to provide your personal data

Where we need to collect your personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

14. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy policy.

15. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact our data representative on info@jfgcomms.co.uk

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.

