

Publica is committed to protecting and safeguarding your personal data. As part of this commitment, we're updating and communicating our Privacy Policy to meet the standards of the new European data protection law, known as the General Data Protection Regulation (GDPR).

This Privacy Policy explains how we collect and use your personal data, the legal basis for doing so and the rights you hold in respect of your personal data.

This Privacy Policy is applicable to both Publica Associates Limited (7225685) and Publica Community and Research Community Interest Company (7694159).

Publica endeavours to ensure all data held is as accurate and up to date as possible. If your personal information does change at any time, however, then please contact us immediately. Our contact details are as follows:

Publica Associates Limited
Publica Community and Research Community Interest Company (CIC)
Hamilton House
1 Temple Avenue
Temple
London EC4Y 0HA

admin@publica.co.uk

1. PERSONAL DATA COLLECTED BY PUBLICA

Publica is both the controller and processor of the personal data that it holds. It is therefore responsible for all personal data submitted to it under applicable data protection law.

Publica collects the following personal data in order to undertake its business activities:

- 1.1 Personal data in relation to clients and other business contacts. This information may be collected through direct contact (via email, telephone or social media), procurement process, attendance at a Publica led event or through an advertised publically available resource such as a website or public social media profile.
- 1.2 Further business information voluntarily provided to and necessary for the furthering of a client or project contractual relationship with Publica.
- 1.3 Supplier information, whether as a company, partnership or individual payment data, voluntarily provided to and necessary for the furthering of a client or project contractual relationship with Publica. This data includes information necessary for due diligence procedures, processing payments and other related billing information.
- 1.4 Employee information, such as name, job title, postal address, including your home address, where you have provided this to us, business address, telephone number, mobile phone number, fax number and email address, as well as bank details.

We may receive data from third parties such as analytics providers such as Google based outside the EU,

advertising networks such as Facebook based outside the EU.

We may also receive data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

2. USE OF PERSONAL DATA BY PUBLICA

We may use your personal data for the following purposes only:

2.1 PROVISION OF PUBLICA'S SERVICES

We require the use of certain personal data in order to manage our business relationship with clients. This includes on-going communications, implementation of contracts, processing of payments, keeping of records and ensuring compliance with financial and legal regulation.

For customers who have bought products directly, this data also includes their name, title, billing address, delivery address, email address, phone number, contact details, purchase details and your payment card details. We process this data to supply the products that have been purchased and to keep records of such transactions.

Our legitimate interest for processing this data is the fulfilment of our contractual obligations to our clients, through the provision of services and products.

2.2 OTHER BUSINESS ADMINISTRATION

We require the use of certain personal data in order to manage our business relationship with our suppliers and employees. This includes on-going communications, implementation of contracts, processing of payments, implementing of health, safety and security procedures, keeping of records and ensuring compliance with financial and legal regulation.

Our legitimate interest for processing this data is the fulfilment of our contractual obligations to our suppliers and employees.

2.3 COMMUNICATIONS AND MARKETING

We may contact you to provide information that we believe we have a legitimate interest in communicating, including business updates relevant to on-going client relationship and invitations to Publica and other industry events. Our legitimate interest is the continuation of networking and information sharing with existing industry contacts.

Where you have explicitly given your consent to do so, and not since opted-out, we may also use your personal data to communicate with you via email other updates and information on Publica's events, projects, and services.

2.4 PUBLICA WEBSITE

Through our website analytics tracking system Publica collects data about visits to our website such as the visitors IP address, details about their browser, length of visit to pages on our website, number of visits and page views and navigation paths, time zone settings and other technology on the devices used to access our website. Our legitimate interest for the use of this data is that it enables us to understand the effectiveness of our website and other communications activities and support relevant decision-

making.

Please also refer to our website terms of use which explains the use of cookies and other web tracking devices via our website. You can set your browser to refuse all or some browser cookies or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our website terms of use.

3. SHARING OF PERSONAL DATA

We may share your personal data to the following organisations:

- Service providers who provide IT and system administration services, such as the processing of payroll.
- Professional advisers including lawyers, bankers, auditors and insurers who require it for regulatory reasons.
- Government bodies that require us to report processing activities.

We only transfer personal data to third parties for specified purposes. All third parties to whom we transfer your data are required to respect the security of your personal data and to treat it in accordance with the law.

If personal data is provided to Publica by a third party, we request that the third party ensures that it is fully entitled to disclose that personal information to us and that the data may be processed by us in line with this Privacy Policy and the individuals knowledge and understanding of all terms within it.

4. YOUR PERSONAL DATA RIGHTS

Your rights in respect of the personal data we hold about you are as follows:

Right to be informed about data being collected and provided with 'privacy information' about its use, retention and with whom it will be shared, at time that the data is collected.

Right to access information about the personal data we hold about you.

Right to rectify any incorrect personal data, including ensuring its completeness.

Right to erasure of any personal data, provided it is not being used for an on-going legitimate interest or there is a relevant legal or regulatory requirement for its retention.

Right to restrict the processing of personal data if it is incorrect or unlawful, if there is no legitimate interest or if is no longer required by Publica.

Right to portability allowing you to obtain and reuse your personal data for your own purposes.

Right to object that processing is based on legitimate interest, including right to object to profiling analysis made for direct marketing purposes

Right to complain. Publica has procedures in place to ensure that we continuously process your personal

data in an open, accurate and legal manner, that we can comply with any requests without undue delay and that our employees have been trained in these procedures.

If you consider Publica to have incorrectly collected or processed your personal data you can contact us in order to exercise your rights. Requests can be verbal or written and a response will be due within one month, unless the request is particularly complex. We will require you to provide a copy of a valid proof of identification, as a security measure to confirm your right to access the personal data and prevent its unlawful disclosure.

You will not have to pay a fee to access your personal data. However, we reserve the right to charge you a reasonable administrative fee if your request is deemed to be without legitimate cause or excessive.

If we are not able to satisfactorily respond to your request, you also hold the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).

5. SENSITIVE PERSONAL DATA

Sensitive personal data refers to data that 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.

Publica occasionally organises workshops, seminar and events on behalf of clients, and for own purposes. We may ask for provision of special information in relation to health for the purpose of identifying and being considerate of any disabilities or special dietary requirements. The collection of any use of such information is based on consent, with the legitimate interest of being able to make suitable arrangements for inclusivity.

We do not collect any information relating to criminal convictions and offences.

6. INTERNATIONAL TRANSFERS

European law has prohibited transfers of personal data outside of the EEA unless the transfer meets certain criteria, as countries outside the European Economic Area (EEA) do not offer the same level of regulation as within it.

Publica does not currently work with third parties service providers that are based outside the European Economic Area (EEA). However, if a transfer of personal data were to be required we would only proceed after confirming the European Commission had approved the relevant country as providing an adequate level of protection. We would also request your explicit consent to the transfer and you would have the right to withdraw this consent at any time.

7. DATA SECURITY

Personal data is stored on our secured server and we have put in place appropriate security measures to keep it confidential. These safeguards include both organisational and technical procedures such as training, use of permissions, password protection and encryption.

These procedures are designed to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation.

We have procedures in place to deal with any suspected personal data breach and will immediately notify any individuals, as well as the relevant regulatory authority, as soon as a suspected breach takes place.

8. DATA RETENTION

Data will be reviewed to assess if it still required in order to fulfil the purpose of its original collection, including consideration of its nature and sensitivity, processing requirements, the potential risk of unauthorised use or disclosure and any relevant legal, accounting, or reporting requirements. If your personal data is no longer reasonably required for the purpose for which it was collected, or if you have withdrawn your consent and we are not legally required or otherwise permitted to continue storing such data, it will be deleted.

Data that has been collated and made anonymous for research or statistical purposes may be used indefinitely without further notice.

9. UPDATES TO OUR PRIVACY NOTICE:

The Privacy Policy was last updated in May 2018.

We may need to update our Privacy Policy from time to time, in line with evolving data processing and legal requirements. The latest version of the Privacy Policy will always be available on our website and we will communicate any significant changes to the relevant parties.

Publica

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