

Ballou UK – Privacy Notice

1. WHAT IS A PRIVACY NOTICE?

1.1 In order for Ballou UK to operate as an outstanding public relations consultancy, Ballou UK process personal data relating to its clients, journalist contacts and other third parties.

1.2 This Privacy Notice sets out important information about our data processing activities. We encourage you to take the time to read the contents of this Privacy Notice so you can better understand what personal data we process, why we process it, what happens to your personal data and what rights you have in relation to your personal data. It applies to the processing of personal data in relation to services provided by Ballou UK which includes the operation of the Ballou UK website www.balloupr.com.

1.3 When we refer to "Ballou UK", "us", "we" or "our" what we really mean is Ballou PR Limited (company number: 07024126) of Clerkenwell Close, London EC1R 0AT. Ballou UK is a Controller of your personal data.

1.4 We operate in a group of companies alongside:

1.4.1 Ballou PR GmbH (registration number: 2700184) Linienstraße, 10119 Berlin, Germany (**Ballou Germany**); and

1.4.2 Ballou PR Sarl (registration number: 481 126 233) 56 Rue St-Georges, 75009 Paris, France (**Ballou France**).

1.5 This Privacy Notice relates to the processing of your personal data by Ballou UK. For further information about the processing of personal data by Ballou Germany and Ballou France, please see the respective privacy policies at:

1.5.1 Ballou Germany: www.balloupr.com/de/

1.5.2 Ballou France: www.balloupr.com/fr/

1.6 You can contact Ballou using the addresses below:

1.6.1 Ballou UK – info@balloupr.com

1.6.2 Ballou Germany – infoDE@balloupr.com

1.6.3 Ballou France – infoFR@balloupr.com

1.7 It is important that you read this Privacy Notice together with any other privacy notice or fair processing notice Ballou UK may provide to you on specific occasions when we are collecting or processing personal data about you. This Privacy Notice supplements the other Ballou UK notices you receive, and is not intended to override them. However, it does supersede earlier versions of this Privacy Notice.

2. WHAT PERSONAL DATA DOES BALLOU UK COLLECT?

2.1 When we refer to "personal data" we mean information about an individual from which that person can be identified.

Types of personal data we collect

2.2 We process different types of personal data depending on whether you are a client or potential client of Ballou UK, a journalist who we interact with, or simply a visitor to our website. We may process the following personal data about you:

2.2.1 Full name

2.2.2 Job title

2.2.3 Email address

2.2.4 Contact telephone numbers

2.2.5 Account details for invoicing

2.2.6 Data relating to the services we provide including what services we have provided, what contacts have been made and what payments have been made in connection with these services

2.2.7 We may also process personal data that you give to us about directors and other individuals in your organisation in relation to the services set out in our engagement letter with you

2.3 As well as "personal data" you may have heard about "special categories of personal data". This is information about an individual's race, ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not process any special categories of personal data about you and we do not collect any personal data about criminal convictions or offences.

Where we get your personal data from

2.4 We collect information about you from different sources, including:

2.4.1 From you directly

2.4.1.1 When you use our website, for example from contact forms, when you subscribe to our newsletters and when you download documentation and other free resources.

2.4.1.2 When you correspond with us by post, phone, email, through social media or otherwise.

2.4.2 From providers of payment services

2.5 We try to be sure that the personal data we hold about you is accurate, and so please get in touch with us if your personal data changes so we can update our records. You can contact us using the details provided in this Privacy Notice.

2.6 Our services and our website are not intended for use by children, and we do not knowingly process personal data relating to children.

2.7 Our website may include links to third party websites, plug-ins or applications that allow third parties to collect or share your personal data. We have no control over the processing activities of these third party websites, and so when you leave our website, please read the privacy notice of every website you visit.

3. WHY DOES BALLOU UK NEED TO PROCESS MY PERSONAL DATA?

3.1 There are a number of reasons why we process your personal data. We have summarised the reasons within the table below.

Purpose	Types of Data	Lawful Basis for Processing
To contact you	Full name, job title, email address, contact telephone numbers, postal address	Performance of a contract, or the potential performance of a contract, with you Necessary for our legitimate interests (for running our business, to keep our records updated, to recover debts due to us and to provide you with the services you have requested)
To manage our relationship with you (for example, providing you with client or contact services, asking you for feedback and to notify you about changes to our terms or this Privacy Notice)	Full name, job title, email address, contact telephone numbers, postal address Data relating to the services we provide Data relating to how you use our website	Performance of a contract, or the potential performance of a contract, with you Necessary for our legitimate interests (for running our business, to respond to any questions or complaints, to keep our records updated and to provide you with the services you have requested)
If you are a journalist or media organisation, to contact you on behalf of our clients and to put you in touch with our clients	Full name, job title, email address, contact telephone numbers, postal address Data relating to the services we provide	Performance of a contract, or the potential performance of a contract, with you Necessary for our legitimate interests (for the running of our business, to keep you informed of relevant news from our clients so you can include them in publications and to provide our clients with their services)
To provide you with support	Full name, job title, email address, contact telephone numbers, postal address Data relating to the services we provide Data relating to how you use our website	Performance of a contract, or the potential performance of a contract, with you
To make suggestions, recommendations and provide information to you about goods or	Full name, job title, email address, contact telephone numbers, postal address	Necessary for our legitimate interests (to develop and grow our business)

services that may be of interest to you	Data relating to the services we provide Data relating to how you use our website	
To administer and protect our business and our website (for example, troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Full name, job title, email address, contact telephone numbers, postal address Data relating to the services we provide Data relating to how you use our website	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) Necessary to comply with our legal obligation
To comply with requirements imposed by law or any court order (for example, to verify your identity and to prevent or detect fraud)	Full name, job title, email address, contact telephone numbers, postal address Data relating to the services we provide Data relating to how you use our website	Necessary to comply with our legal obligations

3.2 Where we need to process 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. This means that we may not be able to provide you with the information or services you require. We will let you know if this is the case at the time.

3.3 We may process your personal data for a different purpose than that listed above and without your consent where it is necessary for us to comply with our legal obligations.

3.4 If you would like further information about the specific legal basis for our processing of your personal data, please get in touch with us.

Marketing

- 3.5 We may process your personal data for marketing purposes to keep you up to date with the latest products, services and promotions we have to offer. You will receive marketing communications from us or registered to any promotions we offer, and in each case you have not opted-out of receiving those communications.
- 3.6 If you no longer want to receive marketing communications from us you can change your mind at any time by:
- 3.6.1 replying with unsubscribe to the marketing communications you receive; or
 - 3.6.2 contacting us using the details in this Privacy Notice.
- 3.7 If you opt-out of receiving marketing communications we may still process your personal data in order to fulfil our contract with you and in accordance with our legal, accountancy and regulatory obligations.
- 3.8 We do not allow third parties to use your personal data for their own marketing purposes without first obtaining your consent. You have the right to withdraw this consent at any time. If you no longer want to be contacted by third parties for marketing purposes, please follow the instructions in their marketing communications or read their privacy notices to find out how to unsubscribe.

3.9 **Cookies**

- 3.10 Our website may automatically collect data about how you use our services in order to help us improve future functionality. This may include personal data. Please read our cookie policy to get further information about the cookies we use: www.balloupr.com/cookies/

4. **WHAT DOES BALLOU UK DO WITH MY PERSONAL DATA?**

- 4.1 We use your personal data for the purposes set out in section 3 above. This might mean that we have to share your personal data with third parties, including:
- 4.1.1 Subcontractors that we work with to promote our clients brands;
 - 4.1.2 Service providers who act as processors on our behalf in order to provide services such as IT and administrative support, event and venue hire and cloud database providers;

The above third parties are based inside of the EEA
 - 4.1.3 Journalists and media organisations who we may contact on behalf of our clients so they can write about our clients in publications;
 - 4.1.4 Our clients, who we may provide your personal data to if you are a journalist or media organisation and it makes sense for you to liaise directly;

The above third parties may be based outside of the EEA
 - 4.1.5 If we choose to restructure our business we may share your personal data with third parties who we choose to sell, transfer or merge parts of our business and assets with, or who we seek to acquire or merge with. New owners of our business may use your personal data in the same way as set out in this Privacy Notice; or

4.1.6 Other legal, regulatory, judicial and law-enforcement agencies who we may need to share personal data with to comply with our legal obligations.

4.2 These third parties are required to respect the security of your personal data and treat it in accordance with the law. They can only use your personal data in connection with the services we provide to you. We do not allow them to use your personal data for their own purposes unless it is incidental to the services they are providing to you on our request. For example, journalists may use our client's personal data in order to write about our client in a publication, they are not allowed to then use the personal data to market to our clients.

Transfers outside of the EEA

4.3 We may share your personal data with third parties that are based outside of the EEA. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is in place:

4.3.1 We may transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.

4.3.2 We may use specific contracts approved by the European Commission which give personal data the same protection it has in the EEA.

4.3.3 Where we use providers based in the USA we may transfer your personal data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data as is provided in the EEA.

5. HOW LONG DOES BALLOU UK PROCESS MY PERSONAL DATA FOR?

5.1 We only hold your personal data for as long as is necessary in order to comply with the purposes for which we collected it.

5.2 If you are a client or potential client, we usually retain your personal data from our first interactions with each other, throughout our contractual relationship with each other and for seven years after our final interaction with each other.

5.3 If you are a journalist, we may not have a formal contract with you, but we process your personal data on an ongoing basis to be able to notify you of information about our clients. We will usually retain your personal data throughout this relationship and for seven years after our final interaction with each other.

5.4 Regardless of whether you are a client, a journalist, or anyone else, we sometimes need to hold your personal data for longer in order to comply with our legal, accounting and regulatory obligations.

5.5 When we are determining the appropriate retention periods for your personal data we take into consideration a number of factors including what personal data we are processing, the risk of harm from any unauthorised disclosure, why we are processing your personal data and whether we can achieve this outcome by other means without having to process it.

5.6 Sometimes we remove identifying information from your personal data so it is anonymised. When we do this, the information can no longer be associated with you and so we can process it indefinitely without further notice to you. In certain circumstances you may be able to ask to delete this data.

5.7 If you would like further information about exactly how long we hold personal data about you, please contact us using the details in this Privacy Notice

6. **HOW DOES BALLOU UK KEEP MY PERSONAL DATA SECURE?**

6.1 Once we have received your personal data we will use reasonable and necessary procedures and security features to try and prevent unauthorised access. For example, we limit who can access your personal data to those individuals and third parties who need to know it and who are subject to a duty of confidentiality. If we become aware of a data breach we will notify the Information Commissioner's Office. If we believe the data breach is serious, we may notify you in accordance with our legal requirements.

7. **WHAT RIGHTS DO I HAVE?**

7.1 Under data protection laws you have the following rights:

- 7.1.1 to ask us for details of the personal data we hold and process about you (this is usually called a subject access request);
- 7.1.2 to ask that any inaccurate information we hold about you is corrected;
- 7.1.3 to ask that we delete personal data we hold about you (this applies only in certain circumstances);
- 7.1.4 to ask that we stop using your personal data for certain purposes;
- 7.1.5 to ask that we do not make decisions about you using completely automated means;
- 7.1.6 to withdraw your consent; and
- 7.1.7 to ask that we give you the personal data we hold about you, or (where technically feasible) that we give this personal data to a third party chosen by you, in a commonly-used machine-readable format.

7.2 To exercise any of the rights above please contact us using the details in this Privacy Notice. If you do so, please provide us with as much information as you can about the request you want to make to help us respond as soon as we can. You might need to provide us with proof of identity (for example a passport or driving licence) before we can fully respond, as we need to be sure we are giving the correct personal data to the correct individual.

7.3 Please be aware that the above rights are not available to everyone all the time. Some are subject to exemptions, and so we may not always be able, or required, to comply with your request to exercise these rights. You can read more about the rights that you have on the ICO website: <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

7.4 We usually respond to data protection requests within one month, but it can take longer if your request is particularly complex or if you have made a number of requests. You will not usually have to pay a fee to exercise the rights above, but we reserve the right to charge a fee if your request is clearly unfounded, repetitive or excessive; alternatively, we may refuse to comply with your request.

7.5 We may need to process your personal data in order for us to respond to your request.

8. **WHO CAN I CONTACT ABOUT BALLOU UK'S PROCESSING OF MY PERSONAL DATA?**

8.1 Ballou UK works hard to ensure that it processes personal data in compliance with data protection laws. We know that sometimes you might want to ask questions about our processing activities and so please contact us by writing to Ballou UK, Unit G20 Clerkenwell Workshops, 31 Clerkenwell Close, London EC1R 0AT or emailing info@balloupr.com.

- 8.2 If you are not happy with how your personal data is being processed by Ballou UK you have the right to complain to the supervisory authority that oversees data protection compliance in the UK this is the Information Commissioner's Office at Water Lane, Wycliffe House, Wilmslow, Cheshire SK9 5AF. Further details can be found at: www.ico.org.uk
- 8.3 We last updated this Privacy Notice in June 2018, make sure you regularly check back as we do update it from time to time to try and keep it as accurate as we can.