

Footprint Impression Management Ltd

GDPR Privacy Notice (May 2018)

What is the purpose of this document?

Footprint Impression Management Ltd is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you in accordance with the General Data Protection Regulation (GDPR).

It applies to all our clients, suppliers, other visitors to our business and visitors to our website, www.fim.org.uk.

Footprint Impression Management Ltd is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to all clients, suppliers, other visitors to Footprint and visitors to our website. This notice does not form part of any contract to provide services. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The kind of information we hold 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 (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

We only collect personal information for legitimate business interests which allows us to fulfil our obligations to our clients and suppliers, provide good customer service, comply with our

legal and contractual obligations and the requirements of our insurers and maintain our business records and accounts. We will collect, store, and use the following categories of personal information about you, all of which is provided directly by you:

- Project records: contact's name, business email address, business address, phone numbers, signature, names and other details contained in copy drafts and/or photo captions
- Business records: contacts name and business address

How is your personal information collected?

We only collect personal information about clients and suppliers through insurance/project records and business records which may include quotations, copy scripts, photographs, layout proofs/artwork, printer's proofs, purchase orders, emails and general correspondence, invoices, remittance advices and contracts.

PLEASE NOTE: We do not use cookies on our website, collect any personal information from visitors to it or carry out email marketing activity.

How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information for legal business interests in the following circumstances:

1. Where we need to perform the contract we have entered into with you (such as providing marketing, graphic design and print services).
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest [or for official purposes].

Situations in which we will use your personal information

We need all the categories of information in the list above for legitimate business interests which primarily allow us to fulfil our obligations to our clients and suppliers, to perform our contract with our clients to provide marketing, graphic design and print services (including taking payment for our services) and to enable us to comply with legal and contractual obligations under the relevant laws and the requirements of our insurers. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

- Fulfilling our obligations to our clients and suppliers and providing the best service we can
- Administering the contract we have entered into with clients to provide marketing, graphic design and print services and taking payment for our services and with suppliers to purchase their products/services.
- Complying with the requirements of our insurers

- Complying with legal and contractual obligations
- Gathering evidence in the case of a dispute concerning a project
- To prevent fraud
- Maintaining business records and accounts

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you or we may be prevented from complying with our legal obligations (such as to comply with the terms of insurance policies).

Change of purpose

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

Data sharing

We will never share your personal information with any third parties for marketing purposes without your prior consent. We will never sell, rent or trade personal information.

We may have to share your data with third parties, including third-party service providers our insurers, graphic designers, copywriters and printers.

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

We may transfer your personal information outside the EU.

If we do, you can expect a similar degree of protection in respect of your personal information.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where required by our insurers or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including our insurers, claim investigators, graphic designers, copywriters and printers). The following activities are carried out by third-party service providers: insurance claim investigation, providing services required by the project.

How secure is my information with third-party service providers?

All our third-party service providers and other entities in the business are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes.

We only permit them to process your personal data for specified purposes and in accordance with our instructions.

What about other third parties?

We may share your personal information with other third parties, for example a regulator or to otherwise comply with the law.

Data security

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

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

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

Data retention

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, contractual, insurance, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our retention policy which is available from the data protection officer. 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.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Once you are no longer a supplier or contractor of the company we will retain and securely destroy your personal information in accordance with our data retention policy.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the data protection officer in writing.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such 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 the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact John Hirst, Director. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data protection officer

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal

information, please contact, John Hirst, the DPO. 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.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact:

John Hirst, Director, Footprint Impression Management Ltd,

Unit 9A, Barn 2, Heskin Farmers Market & Craft Centre, Wood Lane, Heskin, Chorley, PR7 5PA

email: *john@fim.org.uk*