

FLEA ENTERPRISES LIMITED, DATA PRIVACY POLICY, EFFECTIVE FROM 12 MAY 2018

- 1.1 During the course of our activities we will collect, store and process personal data relating to social media influencers and PR professionals, PR agencies, corporate press offices and other third parties for our digital marketing services (Services), and we recognise the importance of treating this information correctly and lawfully.
- 1.2 Any individual or organisation processing personal data on our behalf must comply fully with our data privacy policy. Any breach of this policy may result in disciplinary action.

ABOUT THIS POLICY

- 2.1 The types of personal data that Flea Enterprises may be required to handle include information about social media influencers and public relations professionals that we communicate with. The personal data, which may be held on computer or other media, is subject to certain legal safeguards specified in the Data Protection Act 1998 (the Act), the General Data Protection Regulations (the GDPR) and other regulations.
- 2.2 This policy sets out the basis on which we will process any personal data we collect from data subjects, or that is provided to us by data subjects or other sources
- 2.3 This policy may be amended at any time
- 2.4 This policy sets out rules on data protection and the legal conditions that must be satisfied when we obtain, process, transfer and store personal data for the purpose of delivering the Services.
- 2.5 Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred to Sally Whittle, Managing Director, 01253 731 955 or sally@fleaenterprises.com

DATA PROTECTION PRINCIPLES

- 3.1 Flea Enterprises ensures that personal data will be processed (a) fairly and lawfully (b) for limited purposes and in an appropriate manner (c) accurately (d) in a manner that is timely and not excessive for the purpose (e) securely and (f) in line with the data subject's rights. Data will not be shared with other people or organisations without adequate protection.
- 3.2 When we collect and process personal data, we do so only in the pursuit of and in accordance with the real and present legitimate interests of our business and taking into account the rights of the data subjects, in particular:
 - Our collection and processing of personal data is limited to the specific purposes set out in our user categories (below)
 - We will always endeavour to notify data subjects of our collection and processing of personal data in line with this policy
 - Data subjects have the right to request that we do not collect and process their personal data at any time

- When sensitive personal data is being processed in the course of our business, additional conditions will be met

PROCESSING FOR LIMITED PURPOSES

4.1 In the course of our business, we may collect and process the personal data set out in the user categories (below). This may include data we receive directly from a data subject (via a registration form or via correspondence over email, mail, telephone etc) and data we receive from other sources including social media accounts, publisher websites and others.

4.2 We will only process personal data for the specific purposes set out in the user categories or for any other purposes specifically permitted by the Act or GDPR.

4.3 We will always endeavour to notify these purposes to a data subject as soon as we first collect the data or as soon as possible thereafter.

NOTIFYING DATA SUBJECTS

7.1 If we collect or process personal data we will always endeavour to inform the data subject about the source of personal data, the purpose for which we intend to process that personal data, and the types of third parties, if any, with which we will share or disclose that personal data.

7.2 Data subjects can limit or prevent our use and disclosure of personal data.

ADEQUATE, RELEVANT AND NON-EXCESSIVE PROCESSING

8.1 We will only collect personal data to the extent that it is required for the specific purpose notified to the data subject.

8.2 We will ensure that personal data we hold is accurate and up-to-date. We will check the accuracy of personal data at the point of collection and at regular intervals afterwards.

8.3 We will take reasonable steps to destroy or amend out-of-date or inaccurate data

8.4 We will not keep personal data longer than is necessary for the purposes for which they are collected. We will take reasonable steps to erase from our systems all data which is no longer required.

PROCESSING IN LINE WITH DATA SUBJECT'S RIGHTS

9.1 Data subjects have the right to request access to any data held about them by a data controller, ask to have inaccurate data amended and prevent processing that is likely to cause damage or distress to themselves or others.

DATA SECURITY

10.1 We will take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

10.2 We will use technical and organisational measures to protect the security of personal data from the point of collection to the point of destruction. Personal data will only be shared with a third-party data processor if they are able to demonstrate compliance with these measures.

10.3 We will maintain confidentiality by ensuring that only persons who are authorised to view data will be able to access that data.

10.4 Personal data will be stored on our central computer system rather than individual computers or devices.

10.5 Security controls include (a) Entry controls. Staff can only access the company's facilities using a secure door code. Guests are accompanied at all times. (b) Lockable desks. Desks and cabinets will be kept locked if they hold confidential information of any kind. (c) Disposal. Paper documents are shredded before being disposed of.

TRANSFERRING DATA OUTSIDE THE EEA

11.1 We may transfer any personal data we hold to a country outside the European Economic Area (EEA), provided that one of the following conditions applies: (a) The country to which the personal data are transferred ensures an adequate level of protection for the data subjects' rights and freedoms. (b) The data subject has given his consent. (c) The transfer is necessary for one of the reasons set out in the Act or the GDPR, including the performance of a contract between us and the data subject, or to protect the vital interests of the data subject. (d) The transfer is legally required on important public interest grounds or for the establishment, exercise or defence of legal claims. (e) The transfer is authorised by the relevant data protection authority where we have confirmed adequate safeguards with respect to the protection of the data subjects' privacy, their fundamental rights and freedoms, and the exercise of their rights.

11.2 Subject to the requirements in clause 12.1 above, personal data we hold may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. That staff maybe engaged in, among other things, the fulfilment of contracts with the data subject, the processing of payment details and the provision of support services.

DISCLOSURE AND SHARING OF PERSONAL INFORMATION

12.1 We may share personal data to third parties: (a) In the event that all or part of the personal data held in the Services is licensed or sold to a public relations agency, a corporate press office or another third party; (b) If all or substantially all of our assets are acquired by a third party, in which case the personal data we hold in the Services will be one of the transferred assets.

12.2 If we are under a duty to disclose or share a data subject's personal data in order to comply with any legal obligation, or in order to enforce or apply any contract with the data subject or other agreements; or to protect our rights, property, or safety of our employees, customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

12.3 We may also share personal data we hold with selected third parties for the purposes set out in the user categories!

SUBJECT ACCESS REQUESTS

15.1 Data subjects must make a formal request for information we hold about them. This should be made in writing and we have a dedicated email address for this purpose which is admin@fleaenterprises.com.

CHANGES TO THIS POLICY

We reserve the right to change this policy at any time. Where appropriate, we will notify data subjects of those changes by mail or email.

APPENDIX: DATA USER CATEGORIES RE FLEA ENTERPRISES LIMITED

Category of Data Subject	Current, former and prospective partners, freelancers, suppliers and contractors
Nature of Personal Data	Name, address, telephone number, email addresses, Paypal and Banking information
Where is this processed?	Within the EEA (UK only)
Source of Data	The data subject or third party publicly available services
Purpose of Processing	Maintenance of records of services provided by the data subject to the data controller, complying with legal requirements and other purposes directly connected with the subject's provision of services
Retention Period	Personal data deleted six years after completion of the services
Legal Basis	Article 6(1)(b) – contract

Category of Data Subject	Current, former and prospective clients and customers including marketing professionals and PR professionals and agencies
Nature of Personal Data	Name, Address, telephone number, email address, social media account links
Source of data	The data subject or third party publicly available services
Where is this processed?	Within the EEA (UK only)
Purpose of Processing	Processing orders for services provided by the data controller to the data subject, maintenance of records of services provided by the data controller, direct marketing, other purposes directly connected with the data controller's provision of services to the data subject
Retention Period	Personal data deleted six years after completion of of the services provided by the data controller to the data subject
Legal Basis for Processing	Article 6(1)(b) contract (current and former clients and customers) and Article 6(1)(f) legitimate interests (former and prospective clients and customers)

Category of Data Subject	Social media influencers, including bloggers, Instagram users, vloggers and media contacts
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Nature of personal data	Name, postcode, email address, photographs, gender, and other information relating to publishing activities of data subject
Source of data	The data subject and other third party publicly available sources
Where is this shared?	The data may be shared with public relations and marketing professionals, PR agencies, corporate press offices and other third parties
Where is this processed?	Within the EEA (UK) and outside the UK
Purpose for processing	Licensing or selling all or part of the personal data to public relations and marketing professionals, PR agencies, corporate press offices and other third parties
Retention Period	Until the data subject ceases to be active professionally for a significant period or requests the removal of his or her personal data
Legal basis for processing	Article 6(1) (f) legitimate interests (of the data controller and clients or customers)