

## This is the privacy notice of MAIL PUBLICATIONS LIMITED

We respect your privacy and are determined to protect your personal data. The purpose of this privacy notice is to inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from). We'll also tell you about your privacy rights and how the data protection law protects you.

### 1. WHO WE ARE AND IMPORTANT INFORMATION

Mail Publications Ltd.  
Forge House, Bearsted Green Business Park, Bearsted, Maidstone. ME14 4DT  
01622 630330

### 2. THE PERSONAL DATA WE COLLECT ABOUT YOU

- Technical Data – includes browser type and version /location/operating system & platform
- Usage Data – includes information about how you use our website, products and services
- Marketing and Communications Data – includes your preferences in receiving marketing from us/your communication preferences

### 3. HOW WE COLLECT YOUR PERSONAL DATA

- Automated technologies or interactions – As you interact with our website, we may automatically collect technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our [cookie policy](#) for further details.
- Third Party Sources – We may receive personal data about you from various third parties as set out below:

Technical Data from the following parties:-

- Analytics providers such as Google based outside the EU
- Search information providers such as Google based inside the EU
- The self-completion of the Contact Us fields

### 4. HOW WE USE YOUR PERSONAL DATA

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To register you as a new client	(a) Identity (b) Contact	Performance of a contract with you
To process your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interest (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) To send job alert emails to anyone who consents	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (to keep our records updated)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security and to prevent fraud) (b) Necessary to comply with legal obligations
To deliver relevant website content and advertisements to you and to measure and understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) technical	Necessary for our legitimate interests (to study how customer's use our Products/services, to develop them, To grow our business and to inform Our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our Products and services, to keep our website updated and relevant.

### 5. WHO WE SHARE YOUR PERSONAL DATA WITH

- Your data is shared with internal departments and our web management company.
- Your data may be shared with a 3<sup>rd</sup> party vendor that is outside the EEA who sends out job alerts

## 6. INTERNATIONAL TRANSFERS

- Your personal data will be shared with a third party vendor that is outside of the EEA when you subscribe to the third party for job alerts.

## 7. DATA SECURITY

- We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online. Full details of our GDPR data protection policy are available, to obtain a copy please call 01622 630330 or email [info@downsmail.co.uk](mailto:info@downsmail.co.uk)

## 8. LINKS TO THIRD PARTY WEB SITES AND SOCIAL MEDIA FEATURES

- Our Website may from time to time, contain links to third-party services such as websites, locations, platforms, applications or services operated by third parties. If you follow a link to or otherwise access any of these third-party services, these third-party services may use their own cookies, web beacons, and other Tracking Technology to independently collect information about you and may solicit Personal Data from you. Please note that these third-party services have their own privacy policies and we do not accept any responsibility or liability for these parties' policies or practices. Please check these policies before you share any Personal Data with these third-party services.

We may offer you the opportunity to use your social media login when interacting with our Website. If you do so, please be aware that you may be sharing your profile information with us. The personal data that is shared will depend on your social media platform settings. Please visit the relevant social media platform and review its privacy policy to understand how your personal data is shared and used in this context.

Social media features may also collect your IP address, which page you are visiting on our Website, and may set a cookie or other Tracking Technologies to enable the applicable social media feature to function properly. Your interactions with these features are governed by the privacy policy of the company providing such features.

The Website may include tools provided by us or third-party services that enable you to send a message to another person. If you use any such tools, please ensure that you only send messages to persons to whom you have permission to send messages. Absent the recipient's consent, we will only use their Personal Data that you provide us to facilitate such messages

## 9. DATA RETENTION

- Data collected to capture usage of the website will be retained for three years.
- Data collected through email registration will be retained for twelve months.

## 10. YOUR LEGAL RIGHTS

Under GDPR regulations individuals have the following rights:-

- The right of access
- The right to be informed
- The right to rectification
- The right to erasure
- The right to restriction of processing
- Rights related to automated decision making, including profiling
- The right to object to processing
- The right to data portability

## 11. CHANGES TO THIS NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

- Changes are periodically made to the information on the website and to these terms and conditions and these changes will be incorporated in new editions of this site. Mail Publications reserves the right to alter or amend any information set out in the website and this Privacy Policy without notice. We will clearly notify users of any changes. If you use the website after Mail Publications has posted the changes, you will be bound by the new terms. You should keep Mail Publications informed of any changes to your personal data during any contractual relationship.

## 12. QUERIES, REQUESTS OR CONCERNS

- **If you have any queries or concerns or concerns please contact us on 01622 630330.**
- 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.

## **What is the purpose of this privacy notice?**

This privacy notice aims to give you information on how we collect and process your personal data through your use of this website, including any data you may provide through this website when you contact us through the email option.

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

You must read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### **Data controller(s)**

Mail Publications is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy notice). For all data matters our contact details are Forge House, Bearsted Green Business Park, Bearsted, Maidstone, Kent, ME14 4DT. Tel: 01622 630330. Email: [info@downsmail.co.uk](mailto:info@downsmail.co.uk). Mail Publications is the controller and responsible for this website.

### **Third-party links outside of our control**

This 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.

## **1. THE PERSONAL DATA WE COLLECT ABOUT YOU**

Personal data, or personal information, means any information about an individual from which that person can be identified. You can find out more about personal data from the [Information Commissioners Office](#).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **identity data** includes first name/last name/ title/
- **contact data** includes contact address email address/ telephone numbers.

We also collect, use and share **aggregated data** such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this 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). Nor do we collect any information about criminal convictions and offences.

### **If you fail to provide 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 goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## **2. HOW WE COLLECT YOUR PERSONAL DATA**

We use different methods to collect data from and about you including through:

- **Directly.** You may give us your identity and contact data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - Create an account on our website;

- Subscribe to our service or publications;
- Request marketing to be sent to you.

### 3. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances;

- **Performance of Contract** this means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- **Legitimate Interest** this means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by requesting our impact assessment.
- **Comply with a legal or regulatory obligation** this means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us on 01622 630330 or email; [info@downsmail.co.uk](mailto:info@downsmail.co.uk)

### PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, with the legal bases we rely on to do so.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us on 01622 630330 if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To register you as a new client	(c) Identity (d) Contact	Performance of a contract with you
To process your order including: (c) Manage payments, fees and charges (d) Collect and recover money owed to us	(e) Identity (f) Contact (g) Financial (h) Transaction	(c) Performance of a contract with you (d) Necessary for our legitimate interest (to recover debts due to us)
To manage our relationship with you which will include: (c) Notifying you about changes to our terms or privacy policy	(c) Identity (d) Contact	(c) Performance of a contract with you (d) Necessary to comply with a legal obligation (to keep our records updated)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(d) Identity (e) Contact (f) Technical	(c) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security and to prevent fraud) (d) Necessary to comply with legal obligations
To deliver relevant website content and advertisements to you and to measure and understand the effectiveness of the advertising we serve to you	(f) Identity (g) Contact (h) Profile (i) Usage (j) technical	Necessary for our legitimate interests (to study how customer's use our Products/services, to develop them, To grow our business and to inform Our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(c) Technical (d) Usage	Necessary for our legitimate interests (to define types of customers for our Products and services, to keep our website updated and relevant.

## **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We have established the following personal data control mechanisms:

### **Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and, in each case, you have not opted out of receiving that marketing.

### **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any company outside of our company.

### **Opting out**

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by emailing [info@downsmail.co.uk](mailto:info@downsmail.co.uk) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, or other transactions.

You can unsubscribe from 3<sup>rd</sup> part job alerts, at any time, by updating your preference on the My Profile tab of your Job Seeker account. If you sign up to receive job alert emails from a 3<sup>rd</sup> party App, you can unsubscribe at any time by clicking the "Unsubscribe" link in any job alert email you receive.

## **Cookies**

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.

## **Change of purpose**

We will only use your personal data 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us on 01622 630330 or email [info@downsmail.co.uk](mailto:info@downsmail.co.uk)

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

## **4. WHO WE SHARE YOUR PERSONAL DATA WITH**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties – Department managers/ sales department / accounts department
- External Third Parties Service for example:
  - Providers acting as processors based in the UK who provide IT and system administration services.
  - Professional advisers acting as processors including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.

- HM Revenue & Customs, regulators and other authorities acting as processors based in the UK who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 5. INTERNATIONAL TRANSFERS

Your personal data will be shared with a third party vendor that is outside of the EEA when you subscribe to the third party for job alerts.

## 6. DATA SECURITY

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

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

## 7. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by email: [info@downsmail.co.uk](mailto:info@downsmail.co.uk)

## 8. YOUR LEGAL RIGHTS

Unless subject to an exemption under the data protection laws, 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 the lawful basis for processing your 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), where applicable 9i.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means);
- 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 our processing of personal data, where applicable i.e. where processing is based on our legitimate interests (or in performance of a task in the public interest/exercise of official authority); direct marketing or processing for the purposes of scientific/historical research and statistics).

If you wish to exercise any of the rights set out above, please email: [info@downsmail.co.uk](mailto:info@downsmail.co.uk)

**No fee required – with some exceptions** - 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.

**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 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.

**Time limit to respond** - 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.

## **9. CHANGES TO THIS NOTICE AND YOUR DUTY TO INFORM US OF CHANGES**

This version was last updated on 1 November 2019 and historic versions can be obtained by contacting us.

From 25 May 2018 there were changes in data protection laws and we will respond to your requests (for example, a request for the transfer of your personal data) as set out in our GDPR policies.

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

## **10. QUERIES, REQUESTS OR CONCERNS**

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance contact us on 01622 630330.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](#) 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, UK.