

## **GDPR assurance and privacy notice – Jo Powell Communications**

This privacy notice provides you with details of how Jo Powell Communications collects and processes your personal data. Jo Powell Communications is the name used by sole trader Jo Powell to provide copywriting and other communications services to clients.

This means that Jo Powell Communications is a data processor on behalf of a number of data controllers (i.e. clients).

### **Contact details**

Full name of legal entity: Jo Powell Communications

Email address: jopowellcommunications@gmail.com

Postal address: 28 Bonnington Crescent, Sherwood, Nottingham, NG5 3EY

Telephone number: 0115 967 6453

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

It is very important that the information we hold about you is accurate and up to date.

Please let us know if at any time your personal information changes by emailing us at jopowellcommunications@gmail.com.

### **What data does Jo Powell Communications collect?**

Personal data means any information capable of identifying an individual. It does not include anonymised data.

Certain types of personal data about you may be processed as follows:

- **Identity data** may include your first name and last name, and photos.
- **Contact data** may include your email address and telephone numbers.

### **Sensitive data**

We do not collect any sensitive data about you. Sensitive 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. We do not collect any information about criminal convictions and offences.

Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide us with the requested data, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

### **3. How we collect your personal data**

As a data processor, we collect data supplied by clients who are data controllers and from whom we have received written instructions. This means that they will have gained consent from individuals to supply that data. Data is usually exchanged over email.

### **4. How we use your personal data**

We will only use your personal data when legally permitted and only under the written instruction of the relevant data controller.

Personal data supplied by clients is used for the sole purpose of facilitating contact as needed for the writing of communications materials for clients and to check the names and job titles of people in photographs where they have given their consent for the image to be used in a public communication. Only data needed to perform these functions is collected.

Personal data is never used for marketing communications. We do not collate, hold or use any mailing lists of any type.

### **Purposes for processing your personal data**

Set out below is a description of the ways in which we intend to use your personal data and the legal grounds on which we will process such data.

Please email [jopowellcommunications@gmail.com](mailto:jopowellcommunications@gmail.com) 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.

<b>Purpose/activity</b>	<b>Type of data</b>	<b>Lawful basis for processing</b>
To contact you	(a) Identity (b) Contact	Consent Necessary for our legitimate interests
To confirm details for the client who has already gained consent for data to be used e.g. a photo in a newsletter	(a) Identity (b) Contact	Consent Necessary for our legitimate interests

### **Marketing communications**

Jo Powell Communications does not issue marketing communications or hold any mailing lists.

### **Change of purpose**

Your personal data will only be used for the purposes for which it was collected, 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 find out more about how the processing for the new purpose is compatible with the original purpose, please email [jopowellcommunications@gmail.com](mailto:jopowellcommunications@gmail.com).

If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

## **5. Disclosures of your personal data**

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:

- The data controller from whom the data was received.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.

## **6. International transfers**

Countries outside of the European Economic Area (EEA) do not always offer the same levels of protection to your personal data, so European law has prohibited transfers of personal data outside of the EEA unless the transfer meets certain criteria.

We will not transfer your data outside of the EEA with the possible exception of using Dropbox storage, which is covered by the EU-US Privacy Shield, which requires Dropbox to provide similar protection to personal data shared between the Europe and the US.

Please email [jopowellcommunications@gmail.com](mailto:jopowellcommunications@gmail.com) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## **7. 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 such data. 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.

## **8. 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.

Personal data stored for the purposes of delivering services to our client will be retained for up to 13 months (to allow for the cyclical nature of news, annual events etc).

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see below for further information.

## **9. Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You can see more about these rights at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email [jopowellcommunications@gmail.com](mailto:jopowellcommunications@gmail.com).

You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

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. We will also communicate your request to the relevant data controller.

We will try to respond to all legitimate requests within one month. Occasionally it may take 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.

## **10. Third-party links**

The Jo Powell Communications 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.

## **11. 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 the website you are on may become inaccessible or not function properly.

This website has been created using WordPress, which uses cookies to verify who you are. There are cookies for logged in users and for commenters. Visitors commenting on this website will get cookies stored on their computer. This is purely a convenience, so that the visitor won't need to re-type all their information again when they want to leave another comment. Three cookies are set for commenters:

- `comment_author_{HASH}`

- comment\_author\_email\_{HASH}
- comment\_author\_url\_{HASH}

The commenter cookies are set by Wordpress to expire a little under one year from the time they're set.