



## PRIVACY NOTICE

This is the main privacy notice for The Enquirer. In summary, depending on your relationship with us, we'll use your personal information:

- As needed to provide our products and services, for example to administer subscriptions, take orders and ad placements and handle client queries
- To provide the interactive features of our website, such as commenting, discussion forums and competitions
- To display advertising on our website and other products that is more likely to be relevant to you, and to participate in online advertising networks by sharing information about the kinds of people who visit our site, in order to help us to fund that site and keep the majority of them free to access. Information gathered in this way does not identify you by name.
- To manage our business and to comply with the law.

This Privacy Notice, which covers all of your personal information whether collected online or offline, including by telephone or where you write to us provides more detail on those activities and explains your rights and how to exercise them.

### 1. TYPES OF INFORMATION WE PROCESS AND WHERE IT COMES FROM

Information that we collect and process about you includes:

- Personal and contact details you have provided to us, such as your name, email address or postal address, for example when you register on a Site or to receive a newsletter, enter a sales promotion or competition, or at an Event, or where you have agreed to receive marketing materials from us or third parties;
- Information you have provided when you obtain products or services from us or enquire about those products or services;
- Information included in any communications between us or which you provide in any post on our website or any information collected when you participate in any poll, competition or obtained via social media or which is publicly available;
- We may also collect information from cookies on your devices and this includes information about your IP address, MAC address and other identifying information, information about your devices, including your location, from third party advertising networks and how you use our products and services.

### 2. USE OF YOUR INFORMATION

We want to offer you products and services which you want to use. We may use and permit others to use your personal data as set out below.

We may use information about you to provide and manage the products and services you have subscribed to or purchased, to help us customise our products or services for you, to

help us to choose products and services we think will interest you, for market research and to improve the usefulness of our website, products and services.

We also use your personal data to contact you, including to notify you about changes and updates to products or services, to evaluate the performance of our products and services and to develop new products and services.

We may use your information for the management of our business and improving the operation of our business and that of our business partners, to assess our internal processes and carry out financial checks.

We may monitor, record and store records of calls, email, text messages, social media messages, in person meetings and other communications where permitted by law and we'll do this where the law requires it, or to comply with regulatory rules, to prevent or detect crime, for evidential purposes, in the interests of protecting the security of our communications systems and procedures and for quality control and staff training purposes.

We may use your data to comply with legal and regulatory obligations.

We may make use of your personal information for direct marketing activities, or supply this information to third parties for their direct marketing activities, with your consent or as permitted by law. By direct marketing activities, we mean the communication directly to particular individuals (by e-mail, post or telephone) of any advertising or marketing material.

Where we're relying upon your consent to process personal data, you can withdraw this at any time by contacting us at [privacy@theenquirer.co.uk](mailto:privacy@theenquirer.co.uk)

Information about you helps us sell advertising to businesses of products and services relevant to you so that we can continue to fund these through advertising and you can continue to use our website for free.

We may analyse your data, including whether or not you open a newsletter or click on links, and analyse data, gathered through our website and advertising partners, including by analysing your data in aggregated form into categories (known as segments), to help target offers to you that we think are of interest or relevance to you.

We may disclose details about the use of our website to other businesses e.g. to demonstrate patterns of use to advertisers and others. The information we pass on will be anonymised. We compile anonymous records of user trends which we may make use of ourselves or pass to our associated companies, including advertising networks.

### **3. WHO WE SHARE YOUR PERSONAL INFORMATION WITH**

We share information as needed with our third party service providers and partners, as part of providing and administering our products and services or operating our business or as set out below.

We will disclose your information and co-operate with appropriate bodies and authorities in good faith where we are required to by law, a court order, a regulatory authority, or otherwise, including with the police, trading standards, regulatory authorities or other relevant authorities.

We may also share information to facilitate the sale of one or more parts of our business, including if we are approached by a potential buyer or the restructuring of one or more parts of our business and with auditing organisations.

#### **4. COOKIES**

We collect information about you automatically when you visit our site by using cookies (small text files) and other tracking technology.

#### **5. TRANSFERS OUTSIDE OF EUROPE**

We will not share your personal information outside of the European Economic Area.

#### **6. WHAT ARE THE LEGAL GROUNDS FOR OUR PROCESSING OF YOUR PERSONAL INFORMATION (INCLUDING WHEN WE SHARE IT WITH OTHERS)?**

We rely on the following legal bases to use your personal data:

##### A. Where it is needed to provide you with our products or services, such as:

- Managing products and services you hold with us, or an enquiry about one
- Updating your records, tracing your whereabouts to contact you about your account and doing this for recovering debt (where appropriate)
- All stages and activities relevant to managing any product or service including enquiry, application, administration and management of accounts

##### B. Where it is in our legitimate interests to do so, such as:

- Managing your products and services, updating your records
- To perform and/or test the performance of, our products, services and internal processes
- For some direct marketing communications, subject to appropriate controls and safeguards
- To follow guidance and recommended best practice of government and regulatory bodies
- For management and audit of our business operations including accounting
- To carry out monitoring and to keep records of our communications with you and us
- For market research and analysis and developing statistics
- Where we need to share your personal information with people or organisations in order to run our business or comply with any legal and/or regulatory obligations
- To comply with our legal obligations or where we reasonably believe we are under a legal or regulatory obligation

##### C. With your consent or explicit consent

- For some direct marketing communications and digital advertising activities

#### **7. HOW LONG DO WE KEEP YOUR DATA FOR?**

In general, we keep your personal information for as long as we need it for the purpose for which it was collected, plus a short additional period in case of problems. How long we keep it therefore varies according to the type of information it is and why we have it, and will range

from a few days or weeks to, in some cases, several years. We can provide further information on request.

However, for the editorial side of the business, often this will need to be retained indefinitely for journalistic purposes and data may be used for the researching, compiling and publishing of articles in print and online.

Such information will need to be retained for legal reasons, for follow-up articles, for a paper trail for correspondence, for points of contact, and for other reasons associated with the running of a newspaper and its associated website.

Articles will be published on our website and then archived. Published newspapers are also stored in libraries and our e-editions of newspapers are stored through our websites.

## **8. WHAT ARE YOUR RIGHTS UNDER DATA PROTECTION LAW?**

The law gives you certain rights in respect of the information that we hold about you. Below is a short overview of those rights. The website of the Information Commissioner's Office (<http://www.ico.org.uk>) has a wealth of useful information in respect of your rights over your personal data.

If you wish to exercise your rights, you can write to us by email [privacy@theenquirer.co.uk](mailto:privacy@theenquirer.co.uk) or by post to The Enquirer Series Unit 1 Molyneaux Court, Radford Way, Billericay, Essex, CM12 0BT

### ***Your right to withdraw your consent***

If we are processing your personal data on the basis of your consent, you have the right to withdraw that consent at any time.

### ***Your right to access the information we hold about you***

With some exceptions designed to protect the rights of others, you have the right to a copy of the personal data that we hold about you, as well as information about what we do with it, who we share it with and how long we will hold it for. We may make a reasonable charge for additional copies of that data beyond the first copy, based on our administrative costs.

### ***Your right to have inaccurate information about you rectified***

You have the right to have the information we hold about you corrected if it is factually inaccurate.

### ***Your right to object to what we do with your data, and to have restrictions placed upon it***

Where we process your personal data on the basis of our legitimate interest, you have the right to object to that processing and to have restrictions placed upon it while we consider your objection.

### ***Your right to have your information erased in some circumstances***

You have the right to require us to delete the information that we hold about you if it is no longer necessary for the purpose we collected it for, and there is no other legal basis on which we must, or are allowed to, retain it.

### ***Your right to stop receiving direct marketing from us***

You have the right to require us to stop sending you direct marketing material (for example, promotional emails). It can sometimes take a few days to action these requests.

### ***Your right to complain to the Information Commissioner's Office (ICO)***

You have the right to lodge a complaint about our handling of your personal data with the supervisory authority, which in the UK is the Information Commissioner's Office. But before you do so, please do contact us first to give us a chance to put matters right, at [privacy@theenquirer.co.uk](mailto:privacy@theenquirer.co.uk)

You can contact the ICO on 0303 123 1113.

## **9. CHANGES TO THIS PRIVACY NOTICE**

It's likely that we'll need to update this Privacy Notice from time to time. Any changes to this Privacy Notice will be posted on our website and such changes will become effective as soon as they are posted. Your continued use of our website constitutes notice to you of all these changes.