

Privacy Policy

This Privacy Policy is issued on behalf of Browse Poster so when We refer to “We”, “Us” or “Our” in this Privacy Policy, We are referring to Browse Poster.

We respect your privacy and are committed to protecting your personal data. This Privacy Policy will inform you as to how We look after your personal data when you visit Our website (the "Site"), regardless of where you visit it from, and tell you about your privacy rights and how the law protects you.

1. Important information and who We are

1.1 Purpose of this Privacy Policy

1.1.1 This Privacy Policy aims to give you information on how We collect and process your personal data through your use of the Site, including any data you may provide through the Site.

1.1.2 It is important that you read this Privacy Policy together with any other privacy notice or fair processing 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 Policy supplements the other notices and is not intended to override them.

1.2 Controller

1.2.1 Louise Jakobsen is the controller and responsible for the Site.

1.2.2 Louise Jakobsen is also the data protection officer (the “DPO”) who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the DPO using the details set out in the "Contact" section of this website.

1.2.3 You have the right to make a complaint at any time to the Information Commissioner’s Office (the “ICO”), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact Us in the first instance.

1.3 Your duty to inform Us of changes

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

1.4 Third party links

1.4.1 The Site 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 the Site, We encourage you to read the privacy policy of every website you visit.

2. The data We collect about you

2.1 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).

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

2.2.1 “Identity Data” includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, qualifications, and membership details.

2.2.2 “Contact Data” includes billing address, residential address, delivery address, email address, social media handles and telephone numbers.

2.2.3 “Financial Data” includes bank account and payment card details.

2.2.4 “Transaction Data” includes details about payments to and from you and other details of products and services you have purchased from us.

2.2.5 “Technical Data” includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, full 'Uniform Resource Locators' clickstream to, through and from the Site (including date and time) and other technology on the devices you use to access the Site.

2.2.6 “Profile Data” includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses, and products you viewed or searched for; page response times; download errors; length of visits to certain pages; page interaction information (such as scrolling, clicks, mouse-overs and methods used to browse away from the page).

2.2.7 “Usage Data” includes information about how you use the Site, products and services.

2.2.8 “Marketing and Communications Data” includes your preferences in receiving marketing from us and Our third parties and your communication preferences.

2.3 We may 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 Site 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 Policy.

2.4 We may also collect personal data that includes “Sensitive” or “Special Categories” of personal data.

2.5 Where We need to collect personal data by law, or under the terms of a contract, agreement or arrangement 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.

3. How is your personal data collected?

3.1 We use (or may use) different methods to collect data from and about you including through:

3.1.1 Direct interactions. You may give Us your Identity Data, Contact Data and Financial Data by filling in forms or by corresponding with Us by post, phone, email or otherwise. This includes personal data you provide when you:

- (a) apply for Our products or services;
- (b) create an account on the Site;
- (c) subscribe to Our service or publications;
- (d) request marketing to be sent to you;
- (e) apply to participate in one of our events;
- (f) volunteer in some capacity at one of Our events;
- (g) enter a competition, promotion or survey; or
- (h) give Us some feedback.

3.1.2 Automated technologies or interactions. As you interact with the Site, We may automatically collect Technical Data about your equipment, browsing actions and patterns. We may collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites.

4. How we use your personal data

4.1 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:

4.1.1 Where We need to perform the contract, agreement or arrangement We are about to enter into or have entered into with you.

4.1.2 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. In this Privacy Policy, "Legitimate Interests" means Our interest in conducting and managing Our affairs to enable Us to give you the best service/product and the best and 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 contacting Us.

4.1.3 Where We need to Comply with a legal or regulatory obligation.

4.2 Purposes for which we will use your personal data

4.2.1 We have set out below, in a table format, a description of all the ways We use or may use your personal data, and which of the legal bases We rely on or would rely on to do so. We have also identified what Our Legitimate Interests are where appropriate and the period for which we retain (or would retain) your personal data. For the avoidance of doubt, please be aware that where we use a specific type of personal data for more than one reason and there is a conflict between the retention period for each such use in the table below, the longest retention period shall prevail.

4.2.2 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 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	Retention period (not exceeding)
To apply to participate in or volunteer at, or participate in or volunteer at, any of Our events	(a) Identity Data (b) Contact Data (c) Transaction Data (d) Technical Data (e) Profile Data (f) Marketing and Communications Data	(a) Legitimate Interests (We need this data to be able to allow you to participate in/volunteer at Our events and to stage Our events). (b) Necessary to comply with a legal or regulatory obligation (including security and safety at Our events and tax purposes).	5 years from last application to participate/volunteer
To televise, film and/or otherwise record Our events and to take photographs and record footage of Our events	(a) Identity Data	(a) Legitimate Interests (We need the ability to publish, display, sell and distribute Our events by means of film, television, radio, print media, internet, publicity material or any other media now or in the future).	In perpetuity
To provide your services on a casual labour basis to Us	(a) Identity Data (b) Contact Data (c) Financial Data (d) Transaction Data (e) Profile Data (f) Marketing and Communications Data	(a) Performance of a contract with you. (b) Legitimate Interests (We need this data to be able to allow you to perform such a role). (c) Necessary to comply with a legal or regulatory obligation (including security and safety at Our events and tax purposes).	7 years since you applied for your last role
To be included on Our media lists	(a) Identity Data (b) Contact Data (c) Marketing and Communications Data	(a) Legitimate Interests (We need this data to be able to enable Our events to be covered in the media).	3 years

<p>To be a partner, sponsor or supplier or potential partner, sponsor or supplier of or to Us or Our events</p>	<p>(a) Identity Data (b) Contact Data (c) Financial Data (d) Transaction Data (e) Marketing and Communications Data</p>	<p>(a) Performance of a contract with you (as Our partner, sponsor or supplier). (b) Legitimate Interests (We need this data to be able to contact you about becoming a partner, sponsor or supplier to allow you to become officially associated with Us or Our event(s)). (c) Necessary to comply with a legal or regulatory obligation (including for tax purposes).</p>	<p>6 years after the end of any contract (if any) or 6 years from the last correspondence about being a potential partner, sponsor or supplier</p>
<p>To register you as a new customer (not otherwise dealt with in this table)</p>	<p>(a) Identity Data (b) Contact Data</p>	<p>(a) Performance of a contract with you. (b) Legitimate Interests (to provide you with customer services).</p>	<p>3 years from last registration as a customer or last interaction with Us as a customer, whichever is later</p>
<p>To process and deliver your order including: (a) Manage payments, fees and charges; and (b) Collect and recover money owed to Us</p>	<p>(a) Identity Data (b) Contact Data (c) Financial Data (d) Transaction Data (e) Marketing and Communications Data</p>	<p>(a) Performance of a contract with you. (b) Necessary for Our Legitimate Interests (to recover debts due to Us). (c) Necessary to comply with a legal or regulatory obligation (including for tax and consumer protection purposes).</p>	<p>6 years from order completion</p>
<p>To manage Our relationship with you which may include: (a) Notifying you about changes to Our terms or Privacy</p>	<p>(a) Identity Data (b) Contact Data (c) Profile Data (d) Marketing and Communications Data</p>	<p>(a) Performance of a contract with you (b) Necessary to comply with a legal or regulatory obligation (c) Necessary for Our Legitimate Interests (to keep Our records updated and to study how</p>	<p>6 years from last correspondence</p>

Policy; (b) Asking you to leave a review or take a survey; and (c) Dealing with any complaints and responding to feedback		customers use Our products/services)	
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity Data (b) Contact Data (c) Profile Data (d) Usage Data (e) Marketing and Communications Data	(a) Performance of a contract with you (b) Necessary for Our Legitimate Interests (to study how customers use Our products/services, to develop them and grow Our events)	3 years from prize draw, competition or survey
To administer and protect Our products and events, their reputation and the Site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity Data (b) Contact Data (c) Technical Data	(a) Necessary for Our Legitimate Interests (for provision of our goods and services, running Our events, provision of administration and IT services, network security, and to prevent fraud). (b) Necessary to comply with a legal or regulatory obligation.	3 years from collection of data
To deliver relevant Site content and measure or understand the effectiveness of what We serve to you	(a) Identity Data (b) Contact Data (c) Profile Data (d) Usage Data (e) Marketing and Communications Data (f) Technical Data	(a) Necessary for Our Legitimate Interests (to study how customers use Our products/services, to develop them, and to inform Our marketing strategy).	3 years from collection of data
To use data analytics to improve the Site and Our products/services, marketing, customer relationships and experiences	(a) Technical Data (b) Usage Data	(a) Necessary for Our Legitimate Interests (to define types of customers for Our products and services, to keep the Site updated and relevant, and to inform Our marketing strategy).	3 years from collection of data

To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity Data (b) Contact Data (c) Technical Data (d) Usage Data (e) Profile Data	(a) Necessary for Our Legitimate Interests (to develop Our products/services).	3 years from last participation in one of Our events or purchase of our products (whichever is the later)
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4.3 Automated decision making

4.3.1 We may use your personal data to make the following automated decisions:

(a) Competitions: We may, from time to time, run competitions where each participant’s personal data is uploaded to Our database and a successful participant is automatically selected at random.

4.4. Marketing

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

4.5 Promotional offers from Us

4.5.1 We may use your Identity Data, Contact Data, Technical Data, Usage Data 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. (We call this marketing).

4.5.2 You may receive marketing communications from Us if you have requested information from Us or purchased goods or services from Us or if you provided Us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

4.6 Third-party marketing

4.6.1 We will get your express opt-in consent before We share your personal data with any company for marketing purposes.

4.7 Opting out

4.7.1 You can ask us or third parties to stop sending you marketing messages at any time by logging into the Site and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting Us at any time.

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

4.8 Cookies

4.8.1 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 Site may become inaccessible or not function properly.

4.9 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.

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.

5. Disclosures of your personal data

5.1 We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4.2 above.

5.1.1 Internal Third Parties as set out in paragraph 10 below.

5.1.2 External Third Parties as set out in paragraph 10 below.

5.1.3 Specific third parties listed or described in the table in paragraph 4.2 above.

5.1.4 Third parties to whom We may choose to transfer the organisation or operation of some or all of Our events or operations. If such a change happens, then such third parties may use your personal data in the same way as set out in this Privacy Policy.

5.2 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.

6. International transfers

6.1 Should any external third party We use or may use be based outside the EEA, their processing of your personal data will involve a transfer of data outside the EEA. Such destinations may not have laws which protect your information to the same extent as in the EEA.

6.2 Whenever We transfer your personal data out of the EEA, We ensure or will ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

6.2.1 We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.

6.2.2 We may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

6.2.3 Where We use providers based in the US, We may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

6.3 Please contact Us if you want further information on the specific mechanism used by Us when transferring your personal data out of the EEA.

7. Data security

7.1 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 persons, agents, contractors and other third parties who have a need to know. They will only process your personal data on Our instructions and they are subject to a duty of confidentiality.

7.2 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

8.1 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.

8.2 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.

8.3 Details of retention periods for different aspects of your personal data are set out in the table in paragraph 4.2 above.

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

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

8.6 In some circumstances We may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case We may use this information indefinitely without further notice to you.

9. Your legal rights

9.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data. This includes you having the right to:

9.1.1 Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data We hold about you and to check that We are lawfully processing it.

9.1.2 Request correction of the personal data that We hold about you. This enables you to have any incomplete or inaccurate data We hold about you corrected, though We may need to verify the accuracy of the new data you provide to Us.

9.1.3 Request erasure of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where We may have processed your information unlawfully or where We are required to erase your personal data to

comply with local law. Note, however, that We may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

9.1.4 Object to processing of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where We are processing your personal data for direct marketing purposes. In some cases, We may demonstrate that We have compelling legitimate grounds to process your information which override your rights and freedoms.

9.1.5 Request restriction of processing of your personal data. This enables you to ask Us to suspend the processing of your personal data in the following scenarios: (a) if you want Us to establish the data's accuracy; (b) where Our use of the data is unlawful but you do not want Us to erase it; (c) where you need Us to hold the data even if We no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to Our use of your data but We need to verify whether We have overriding legitimate grounds to use it.

9.1.6 Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for Us to use or where We used the information to perform a contract with you.

9.1.7 Withdraw consent at any time where We are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, We may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

9.2 If you wish to exercise any of the rights set out in paragraph 9.1 above, please contact Us.

9.3 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 fee if your request is clearly unfounded, repetitive or excessive. Alternatively, We may refuse to comply with your request in these circumstances.

9.4 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.

9.5 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.

10. Definitions

10.1 Save as otherwise defined or the context otherwise requires, in this Privacy Policy the following words or phrases shall have the following meanings:

10.1.1 "Internal Third Parties" means any persons directly involved with assisting the person named in paragraph 1.2.1 and 1.2.2 on a voluntary basis who, in the course of providing such assistance, act as joint controllers or processors and who are based in the United Kingdom.

10.1.2 "External Third Parties" means:

- (a) Service providers (other than Internal Third Parties) acting as processors, including, without limitation, IT and system administration services.
- (b) Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- (c) HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- (d) Broadcasters and other media including, without limitation, local radio and written word news outlets.