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# Privacy Policy

The following discloses the information gathering and dissemination practices of Post Publications Ltd (PPL) for all websites and web applications which link to this policy and are published by Post Publications Ltd (PPL). Please read this agreement carefully before accessing or using our services. By accessing or using our services, you agree to be bound by the terms and conditions below. PPL may modify this agreement at any time, and such modifications shall be effective immediately upon posting of the modified agreement.

If you wish to amend any of the personal information that we hold about you, or update your marketing preferences, you can do so at any time through your account if you have an active subscription with us. All of our newsletter and offer communications have an unsubscribe link which will cease all communications from that list. You can also unsubscribe from the newsletter by emailing [helpdesk@sbpost.ie](mailto:helpdesk@sbpost.ie) (<mailto:helpdesk@sbpost.ie>)

If your data is held from a historical service we provided and within the retention period set out later in this agreement you can request this through our Data Access Request form (<https://secure.businesspost.ie/data-request>) or by emailing [helpdesk@sbpost.ie](mailto:helpdesk@sbpost.ie) (<mailto:helpdesk@sbpost.ie>).

If you do not accept that we process your data in the manner detailed in this policy, please do not submit any personal data to us.

### **Age Restriction**

All services provided by PPL, on all websites and web applications which link to this policy, are only open to persons over 18 years of age. Please do not submit any data or request any services which require the submission of data if you are under 18 years of age.

### **The Controller of your Data**

PPL is considered a data controller in the Republic of Ireland for the purposes of the General Data Protection Regulation (EU) 2016/679 of the European Parliament on the protection of natural persons with regard to the processing of personal data and on the free movement of such data. PPL will deal with the Irish Office of the Data Protection Commissioner (<https://www.dataprotection.ie>) as the Lead Supervisory Authority for regulating all data protection matters within the organisation. At PPL, we guarantee that all the data you send to us is processed fairly and lawfully, and with due skill and care. We will also guarantee you that the data you submit is solely used in accordance with the purposes as set out in this policy.

### **Information we collect and why we collect it**

#### **Submitted by you:**

PPL collects and uses your personal information to perform the functions / services you have requested. We will collect personal data. Here we detail the information we may collect about you when you request a service from us and why we collect it. Not all fields are mandatory or required for some services (for example signing up for our email newsletter would only require your email address):

Email address

First Name

Surname

Payment card information

Password for our services

Phone number

The industry you work in

The level at which you work within your industry

We require this personal information so our services work as you would expect; for example, delivering a newsletter to you alerting you of our content, providing access to our digital content, notifying you of changes to our services and dealing with customer services queries.

### **IP address**

We use and store your IP address to help diagnose problems with our server and to administer our website. Your IP address may also be used to help identify you and to gather broad demographic information.

### **Cookies**

Cookies is a text file that is stored on your computer's hard drive relating to your viewing history of a website. If you return to that website, it can present tailored selections to you created upon the stored information about your last visit. You can normally adjust the settings of your browser to avoid the acceptance of cookies. Cookies will not harm your system.

We use site tracking software to monitor traffic patterns and site usage to help us develop and improve the digital services we provide to you.

Security: These cookies allow us to ensure the security of your account as well as limit the amount of logins you are required to make should you request this feature.

**Analytics:** In order to monitor how our sites are performing, we collect data about page visits. This information is completely anonymous – we cannot determine who it came from. When we use this data, we look at numbers of visitors overall rather than individual visits.

Analytics information is used in reports and to improve our services.

For example, we track:

Article views

Popular times

Length of visit

Where visitors came from

Technical data about devices or browsers used to access the site

We use Google to provide our analytics data. You can read more about how Google Analytics treats your data at: Google: Safeguarding your data (<https://support.google.com/analytics/answer/6004245>). You can also read Google's full privacy policy (<https://policies.google.com/privacy?hl=en&gl=uk>).

### **Disclosure of your personal information**

We work with other companies who help us run our business ("Service Providers"). We are required to send information securely to our Service Providers, who are defined as Data Processors, to perform the services you require as well as perform legal functions and audits. We do not disclose your information to any third parties for the purposes of marketing or any other function other than necessary to perform our services, legal obligations and audits.

Each Service Provider only has access to the information required to perform their services to PPL. Please note that some may not be applicable for the service(s) that you requested from us.

Audit Bureau of Circulations Ltd (digital circulation audits)

Mailchimp (newsletter and sign up)

Cloudflare (DNS management and traffic proxying)

Square1.io (site and apps maintenance)

Linode (server hosting)

Amazon S3 (media storage and email delivery)

Sentry.io (application error tracking)

Fabric.io (mobile app stats and crash reporting)

Stripe (payment processing and subscription management)

### **Transfer of data outside of the EU**

Here we set out the two Service Providers that PPL employs to provide services to you that may securely transfer data outside of the EU from selected data we provide which we also list below:

#### **Stripe**

Email address

Payment card information

Stripe have certified to the EU-U.S. and Swiss-U.S. Privacy Shield Framework. For more information click here (<https://support.stripe.com/questions/stripe-and-european-data-transfers>).

#### **Mailchimp**

Email address

Mailchimp have certified to the EU-U.S. and Swiss-U.S. Privacy Shield Framework. For more information click here (<https://mailchimp.com/legal/privacy/>).

### **The length of time we retain your personal information**

We retain your personal information for as long as you continue to receive digital services from us. This allows you to continue accessing our content, products and services.

If you cease receiving a service from PPL we will retain your personal data for a

total of 24 months for legal and audit reasons. After this period we will either automatically delete the data completely or make the database entry completely anonymous, only retaining non-personal information such as the service type.

It is sometimes necessary for us to keep your personal information for longer periods of time, for example:

If there is a statutory requirement to retain it.

If we require the information for legal reasons or there is a legitimate business need for us to retain it.

To ensure we do not contact you if you have asked us not to.

### **Changes to this Privacy Statement**

Where a change is made to this Privacy Policy it will be set out on all websites and web applications which link to this policy to ensure that you are aware of what information we collect and how we will use it. If we plan to use Personal Data in a way that is inconsistent from that stated in this Privacy Policy, we will inform you in advance by email, and it will be your decision as to whether or not you are happy that we continue to store and process your information.

This privacy policy is effective from 22/05/18.

### **More information**

Post Publications Limited are registered in Ireland under company number 148865.

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