

PRIVACY POLICY – PURPLE PUBLIC RELATIONS LIMITED

Introduction

Purple Public Relations Limited (referred to as **Purple** or **we** or **our** or **us**) is a company registered in England under number 03419892 whose registered office address is located at 27-29 Glasshouse Street, London W1B 5DF. We also have offices in New York and Los Angeles.

Purple is a leading global lifestyle communications agency working with international brands and talent across fashion, beauty, music, art, design, food, travel and property.

The aim of this privacy policy is to let you know what personal information we collect from you when you use our website, receive services from us or provide services to us, when you contact us or apply for a job with us and when we communicate with you about our clients and campaigns. It describes how we store and use your personal information and how you can access and manage this information. Your personal information (also called 'personal data') is the information which identifies you as an individual that we get from you and others in various ways. Purple is the data controller for the purposes of the General Data Protection Regulations (GDPR) and data protection legislation from time to time in force and is responsible for your personal data.

Your personal information may be stored online and therefore we take steps to ensure that our systems are well protected.

Types of Information Collected by Purple

You may give us your identity and contact details (such as your first name and last name, email address, phone number and address), where you: send us your CV with respect to potential work with Purple, enquire about work with us, apply for jobs with us via a job board, attend events organised by us, correspond with us by post, phone, email or subscribe to our publications, give us your business card, request marketing to be sent to you or give us some feedback about our site or PR services.

We will also collect data from you regarding your preferences in receiving marketing from us and your communication preferences.

We may also receive personal data about you from other sources such as our clients and from third party sources, such as Fashion/Beauty Monitor, Gorkana and Diary Directory. In addition, if you 'like' our page on Facebook or 'follow' us on Twitter and LinkedIn we will receive your personal information from those sites and if you were referred to us through a third party or other supplier - they may share personal information about you with us.

How do we use your personal information?

Our legal basis for the processing of personal data is our legitimate business interests, described in more detail below, although we will also rely on contract, legal obligation and consent for specific uses of data.

We will rely on contract if we are negotiating or have entered into an agreement with you or your organisation or any other contract to provide services to you or receive services from you or your organisation.

We will rely on legal obligation if we are legally required to hold information on you to fulfil our legal obligations – including where you are applying for roles with Purple.

We will in some circumstances rely on consent for particular uses of your data and you will be asked for your express consent, if legally required.

With respect to marketing, if you have previously engaged with us for the provision of services and we are marketing other related services we will take your consent as given unless or until you opt out (this is called soft opt-in consent). For other types of e-marketing we are required to obtain your explicit consent. You have the right to withdraw consent to marketing at any time by contacting us on enquiries@purplepr.com.

Where we need to collect 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. In this case, we may have to cancel a product or service you have with us

Our Legitimate Business Interests

As a public relations and communications agency, we are exercising a legitimate interest in collecting and retaining the personal data of journalists, influencers and Editors so that we can provide you with relevant and useful information about our clients and campaigns and develop our products and services and grow our business.

Data Collected Automatically on our Website

We monitor site traffic, and like most websites, we use a Unique Visitor Cookie (which is supplied and managed by a carefully selected statistics provider) to identify your PC by a random number (e.g. #12489). Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device details about cookies and how you can disable them can be found below.

Making sure your personal data is secure

It is important to be aware that unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to us over the internet and any transmission is at your own risk.

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. All information you provide to us is stored on secure servers in the UK. 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.

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.

Who do we disclose your personal information to?

We may disclose your personal information to any member of our group, which means our subsidiary companies including our subsidiary in the US. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

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

Please contact the Data Protection Representative if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Service Providers: We may disclose your personal data to third party companies and individuals we engage to:

- facilitate our site and services;
- provide certain functions on our behalf in connection with the operation of our business;
- perform site-related services;

These third parties have access to your personal information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Professional Advisers: we may disclose your personal data to our professional advisers including lawyers, bankers, auditors and to those who provide consultancy, banking, legal, insurance and accounting services.

Establishing or defending legal claims: sometimes it may be necessary for us to process personal data and, where appropriate and in accordance with local laws and requirements, special category personal data in connection with exercising or defending legal claims. This may arise for example where we need to take legal advice in relation to legal proceedings or are required by law to preserve or disclose certain information as part of the legal process.

Business Re-Organisations: we may need to disclose your personal data to third parties if we 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 Policy.

Retention period

Compatible with the GDPR we will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Purple is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data

should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs. For details please contact the Data Protection Representative.

Your rights as a data subject

Under the GDPR you have the right to:

- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes. To stop receiving marketing communications from us or change your preferences please contact us enquiries@purplepr.com.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party in certain formats, if practicable.
- **Withdraw consent to processing 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.
- **Make a complaint** to a supervisory body which in the United Kingdom is the Information Commissioner's Office. The ICO can be contacted through this link: <https://ico.org.uk/concerns/>

If you wish to exercise any of the rights set out above, please contact the DPR at privacy@purplepr.com.

- 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.
- 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 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.

Changes to this Privacy Policy and Your Duty to Inform us of Changes

Any changes we make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Privacy Policy.

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.

Contact Us

We have appointed a data protection representative 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 (detailed below) please contact:

Name: Anna Edwards

Email: privacy@purplepr.com

Phone: +44 207 434 7079

The Data Protection Representative and GDPR Champions for each division of the business are responsible for ensuring that this notice is made available to you prior our collection and processing of your personal data.