

## **Lawton Communications Group**

### **UK GDPR Article 13 & 14 Notice**

#### **What is the purpose of this document?**

Lawton Communications Group (LCG) Privacy & Transparency Notice pursuant to General Data Protection Regulation (GDPR) Articles 13 and 14.

This notice is intended for individuals with whom we deal in our business, including candidates for jobs with us. It is not intended for our employees. We categorise those individuals (data subjects) as follows:

- Individuals - private individuals, sole traders and partners in businesses without other employees.
- Corporate Subscribers - people who deal with us in their capacity as employees or owners of businesses which have other employees.
- Employment Candidates - people who have enquired about or who have made either a tentative or formal application for employment with us.

We obtain and process personal data in different ways depending upon you, the purpose of the processing and the way in which we obtained your personal data.

In most circumstances your data will only be processed within the UK or EEA. If for any reason we need to have your data processed elsewhere we will either follow the privacy protection guidance of the UK Information Commissioner's Office or inform you of that processing, any privacy risks involved and what we have done to minimise those risks. In most circumstances we would also seek your consent for that.

You can at any time ask us to tell you what personal data we hold relating to you.

You also have the right to ask us to rectify your data if it is inaccurate, erase it or restrict the processing of it. In some circumstances you can ask us to provide it to you in a format which would allow you to transfer it digitally to another.

Where we have requested and you have given us consent to process your data you may withdraw that consent at any time.

Were our business to be sold all your data would be transferred to the purchaser so that they could use it in the same way as we do now.

If you are at all concerned about our processing of your data please let us know by contacting our Data Protection Officer (DPO) at [dpo@lawtoncommsgroup.com](mailto:dpo@lawtoncommsgroup.com). You may also complain about it to the Office of the Information Commissioner (ICO) [atico.org.uk/make-a-complaint](http://atico.org.uk/make-a-complaint).

#### **Personal Data of an Individual**

##### **Purpose**

We process your data:

- In order to respond to you and so that we can contact you about our or your products and services or the contract we have with you.
- If we need to contact you in connection with any promotion that we are conducting on behalf of a client.
- So as to keep a record of our dealings with you.

##### **Legitimate Interest**

We have a legitimate interest in corresponding or speaking with you as you will have indicated to us or our associates that you wish us to do so or we have previously dealt with you in that connection, or we are doing so on behalf of our client. We do not need your consent. You can however at any time tell us that you do not wish us to contact you again.

## Consent

If we wish to process your data for any other purpose, we will notify you and/or seek your consent.

## Marketing

If we use your data in order to send you marketing material (advertising) about our services we will only do so:

- With your consent (that can be withdrawn by you at any time); or
- Because we are already dealing with you, or have previously dealt with you in connection with the same or similar goods or services and you have not told us that you do not wish such contacts; and
- You have not asked us to stop doing so.

## Those with whom we share it

Some of our data, which could include your personal data, is processed for us offsite by third parties. For example the companies that we use for bulk mailing. Some may be processed outside the EEA/UK.

Your contact details may be held in our Customer Relationship Management software which is hosted by another.

We may, in connection with a project on which we are working with you, provide it to others working on the same project.

We will not otherwise supply your data to any third party for their own use and for their own benefit without your consent.

## Retention

Your data will be retained for so long as we hold records of the project with which you are involved. If we hold your contact details separately from any such matter we will hold them until you tell us that we should delete them.

## Why we need your data

Without your data we would not have the information necessary to be able to communicate with you or provide you with the services that you want us to provide.

## Where we get it

Most of your data held by us will have come from you. Some may have been obtained from directories or persons recommending you to us.

## Personal Data of Corporate Subscribers

### Purpose

We process your data to enable us to contact you in your role within your organisation and in order to record any information that you provide to us or we send to you. That contact may include sending you a newsletter or marketing material but only if they are relevant to your role. We may also need to use it in order that we can recommend you or the goods and services of your organisation to others.

### Legitimate Interest

We have a legitimate interest in using your data for those purposes. We do not need your consent. You can however at any time tell us that you do not wish us to contact you again at all, or that you do not wish to receive marketing material.

### Those with whom we share it

Some of our data, which could include your personal data, is processed offsite by third parties. For example the companies that we use for bulk mailing. Some may be processed outside the EEA/UK. We may, in connection with a project on which we are working with your organisation, provide it to others working on the same project. We may also provide it to third parties seeking our recommendation of your organisation or someone like you.

### Retention

Your contact and other data will only be held for as long as we know you retain your role in your organisation or, if it was relevant to a project, for so long as we retain the records of that project.

## Why we need your data

Your data is needed principally so that we can contact you and otherwise for the purpose set out above.

## Where we got it

The usual source of your data is you or your organisation. On occasions we may obtain it from your colleagues, from mutual clients, from others involved in a project or from publicity material published by your organisation or publicly available directories.

## Personal Data of Candidates

### Purpose

We process your data to enable us to assess you for a role and contact you.

### Legitimate Interest

We have a legitimate interest in using your data for those purposes. We do not need your consent. You want us to do it.

### Those with whom we share it

If we seek references for you we will supply your name and details of the proposed role to your referees.

If we wish to verify your qualifications or suitability we may provide information sufficient to identify you, things that you have told us about yourself and the proposed role to those that can verify the information you have given us.

### Retention

If we decide not to employ you, most personal data about you will be deleted/destroyed six months after that decision is made and we will retain only sufficient data to identify that we have considered you for employment but that your application was unsuccessful. If we think we might want to employ you in future and tell you so, we will retain indefinitely all the data that we have about you. If we employ you, all the data about you will be transferred to your HR file and used and retained in accordance with our policies for employment.

## Why we need your data

Without your data we would be unable to assess you, or contact you.

## Where we got it

The usual source of your data is you or a recruitment consultant or "job board". Some data may come from referees or those we use to verify the information that you provide. We may also carry out general research about you including viewing your social media account

## Locations

### London

24-28 Bloomsbury Way, London WC1A 2SN. Tel +44 (0)20 3556 3664

### Southampton

Enterprise House, Ocean Way, Southampton SO14 3XB. Tel +44 (0)23 8082 8500

### Los Angeles

3415 S. Sepulveda Blvd. Los Angeles CA 90034. Tel +1 (310) 300 4848

### Sydney

Suite 25, Bay 5-7 North, 2 Locomotive Street, Sydney NSW 2015. Tel +61 (0)2 8599 8782

Consulting Ltd. Company No: 08971418. Concio Group Ltd Company No: 15303924. The Stile Agency Ltd Company No: 12573047. Five by Five Ltd. Company No:01444820. FbF Global Pty Ltd. ABN: 28607058015. Five by Five Digital LLC. Reg'd in California. Company Registration Number: 201022410041. LLC is a subsidiary of Lawton Communications Group Inc. Inc Company filed in Delaware, Number: 383644222.

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