



Privacy Notice  
of  
KEY MARKETING SERVICES LIMITED  
T/A KPM GROUP

*Your data matters*

## Table of Contents

<b>Privacy Notice</b> .....	3
Who We Are and What This Notice Covers .....	4
Information We Collect .....	5
Information You Provide to Us.....	5
Information We Collect Automatically .....	5
Information We Collect from Other Sources .....	6
How We Use Information.....	6
Sharing of Personal Data .....	7
How We Share Personal Data.....	7
Security .....	8
Retention.....	8
Data Destruction/Erasure .....	8
Your Choices.....	9
Your Rights .....	9
Other Things You Should Know .....	10
Complaints .....	10
Contact Details.....	10

*This Privacy Notice was last reviewed on the 18/12/2017*

## **Management Commitment**

The Management at Key Marketing Services Limited is committed to ensuring that all personal data is handled responsibly, lawfully and securely. As such, your privacy is critically important to us and the senior management team are responsible for ensuring that the fundamental principles below are applied by all staff dealing with personal data.

Below are our fundamental principles:

- We ensure that your data is processed lawfully, fairly and in a transparent manner
- We only collect your data for specified, explicit and legitimate purposes
- We only gather your data if it is adequate, relevant and limited to what is necessary
- We make sure that wherever possible, your data is accurate and properly maintained
- We only keep your data for as long as necessary
- We ensure that your data is protected and handled securely

Below is Key Marketing Services' privacy notice, which incorporates and clarifies these principles.

“personal data” means any information relating to an identified or identifiable natural person (known as the ‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

**Data Subject:** The “Data Subject” is the individual that the personal data relates to and identifies

**Data Controller:** “Controller” means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

**Data Processor:** “Processor” means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

**Processing:** “Processing” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction

**Filing System:** “Filing System” means any structured set of personal data which are accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis;

**Consent:** “Consent” of the Data Subject means any freely given, specific, informed and unambiguous indication of the Data Subject’s wishes by which, he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

**Legitimate Interest:** “Legitimate interest” is a designation for the use of personal data where that data is controlled and/or processed by the company or processed by a 3<sup>rd</sup> party contractor of the company, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject, which require protection of Personal Data, in particular where the data subject is a child.

**Special Category:** “Special Category” data is personal data which reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health, sex life or sexual orientation.

**Data Breach:** “Personal Data Breach” means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed

## Who We Are and What This Notice Covers

Key Marketing Services Limited (Registered in England 04287333) is a Direct Marketing Organisation based in Swanley, Kent.

Undertaking direct mail and fulfilment we also project manage and deliver business-critical and regulatory communications within, but not restricted to, the Corporate Finance, Investor Relations and Public-Sector Industries.

Our production service incorporates all aspects of direct mail from printing through to mailing, regulatory compliance and marketing communications.

This policy document aims to outline our approach to the obtaining, handling, retention, disposal and data protection throughout the life cycle of our interaction with your data, for us and our partners (where applicable) and your choices and rights within each of these.

This Privacy Notice applies to information that we collect about you when;

- Having personal interactions via various forms of electronic messaging, voice and video communication or face to face.
- Communication of relevant marketing information that you have either consented to or otherwise expect from us as part of an established relationship.
- Out of contractual necessity such as in the delivery of products or services or the employment of our staff
- From 3<sup>rd</sup> parties with whom you have agreed for them to share your data with us.

Throughout this Privacy Notice we'll refer to our other products and services collectively as “Services.”

Below we explain how we collect, use, and share information about you, along with the choices that you have with respect to that information.

Please note that this Privacy Notice does not apply to any of our products or services that have a separate Privacy Notice. These will be presented to you as appropriate should these products or services relate to you.

If you have any questions about this Privacy Notice, please contact us as described in the **Contact Section** below.

## Information We Collect

We only collect information about you if we have a reason to do so—for example, to provide our Services, to communicate with you, or to make our Services better.

We collect information in three ways: if and when you provide information to us, automatically through operating our services, and from outside sources.

## Information You Provide to Us

It's probably no surprise that we collect information that you provide to us. The amount and type of information depends on the context and how we use the information. Here are some examples:

- **Basic Online Account Information:** We ask for basic information from you in order to set up your account. For example, to activate an online account we require a username and email address, and that's it. You may provide us with more information, like your name, but we don't require that information to create your account.
- **Business Account Information:** If you have a business account with us we will require certain information in order to fulfil our obligations to you. This information will include contact details such as email, phone number and mailing address for individuals associated with your account as well as account preferences and service history in order to provide you with the best service possible.
- **Transaction and Billing Information:** If you buy something from us, you will provide additional personal and payment information that is required to process the transaction and your payment, such as your name, payment information, and contact information.
- **Communication Purposes:** You may also provide us information when you respond to surveys, communicate with our Helpdesk about a support question, or post a question in our public forums.

## Information We Collect Automatically

We also collect some information automatically

**Log Information:** Like most online service providers, we collect information that web browsers, mobile devices, and servers typically make available, such as the browser type, IP address, unique device identifiers, language preference, referring site, the date and time of access, operating system, and mobile network information. We collect log information when you use our Services in order to assess the performance of our systems.

**Usage Information:** We collect information about your usage of our Services. For example, we collect information about the actions that administrators and users perform – in other words, who did what, when and to what piece of information on our system (e.g. A marketing campaign email containing a link to our website) along with information about your device (e.g., mobile screen size, name of cellular network, and mobile device manufacturer). We use this information to, for example, provide our Services to you, as well as get insights on how people use our Services, so we can make our Services better.

**Location Information:** We may determine the approximate location of your device from your IP address. We collect and use this information to, for example, calculate how many people visit our Services from certain geographic regions. We may also collect information about your precise location via our mobile apps if you allow us to do so through your mobile device operating system's permissions.

**Information from Cookies & Other Technologies:** A cookie is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. Pixel tags (also called web beacons) are small blocks of code placed on websites and e-mails. Key Marketing Services uses cookies and other technologies like pixel tags to help us identify and track visitors, usage, and access preferences for our Services, as well as track and understand e-mail campaign effectiveness and to deliver targeted ads. For more information about our use of cookies and other technologies for tracking, including how you can control the use of cookies, please see [here](#) for information.

## Information We Collect from Other Sources

We may also get information about you from other sources. For example, if you create or log into your account through another service (like Google) or if you connect your website or account to a social media service (like Twitter), we will receive information from that service (such as your username, basic profile information, and friends list) via the authorisation procedures used by that service. The information we receive depends on which services you authorise and any options that are available.

We may also obtain information from third party services about individuals who are not yet our users, which we may use, for example, for marketing and advertising purposes.

## How We Use Information

We use information about you as mentioned above and as follows:

- To provide the following Services
  - Direct Marketing (electronic and physical)
  - Fulfilment
  - Marketing campaigns
  - Print Management
  - Distribution
- **To further** develop our Services - for example by adding new features that we think our users will find of benefit;
- **To monitor** and analyse trends and better understand how users interact with our Products and Services, which helps us improve our Services and make them easier to use;
- **To monitor** and protect the security of our Services, detect and prevent fraudulent transactions and other illegal activities, fight spam, and protect the rights and property of Key Marketing Services and others;

- **To communicate** with you about offers and promotions offered by Key Marketing Services and others that we think will be of interest to you, solicit your feedback, or keep you up to date on Key Marketing Services and our products; and
- **To personalise** your experience using our online Services, provide content recommendations and serve relevant advertisements based on your preferences.

## Sharing of Personal Data

### How We Share Personal Data

We do not sell our users' private personal information.

We share your personal data in the limited circumstances spelled out below and with appropriate safeguards on your privacy:

**Subsidiaries, Employees, and Independent Contractors:** We may disclose information about you to our subsidiaries, our employees, and individuals who are our independent contractors that need to know the information in order to help us provide our Services or to process the information on our behalf. We require our subsidiaries, employees, and independent contractors to follow this Privacy Notice for personal information that we share with them.

We may also request your consent to process limited elements of your data in specific ways. Where we require this consent, it will be presented to you in a way that allows you to have a clear understanding of what you are consenting to and enable you to agree to this in a clear and positive way.

**Sharing with Third Parties:** We may share information about you with third party vendors who need to know information about you in order to provide their services to us. This group includes vendors that help us provide our Services to you (like payment providers that process your credit and debit card information) and those that help us understand and enhance our Services (like analytics providers). We require vendors to agree to privacy commitments in order to share information with them which becomes part of our contract with them and is in our Terms and Conditions – third party vendors and Clients agree to ensure that lawful grounds have been established and that all notices and consents are in place for any personal data that they ask Key Marketing Services to process on their behalf.

**As Required by Law:** We may disclose information about you in response to a subpoena, summons, court order, or other governmental request.

**To Protect Rights and Property:** We may disclose information about you when we believe in good faith that disclosure is reasonably necessary to protect the property or rights of Key Marketing Services, third parties, or the public at large. For example, if we have a good faith belief that there is an imminent danger of death or serious physical injury, we may disclose information related to this without delay.

**Business Sale or Transfers:** In connection with any merger, sale of company assets, or acquisition of all or a portion of our business by another company, or in the unlikely event that Key Marketing Services goes out of business or enters bankruptcy, user information would likely be one of the assets that is transferred or acquired by a third party. If any of these events were to happen, the new business owner(s) would be responsible for ensuring that all personal data to which this privacy notice relates, is handled in accordance with this privacy notice.

**Aggregated and De-Identified Information:** We may share information that has been aggregated or reasonably de-identified, so that the information could not reasonably be used to identify you. For instance, we may publish aggregate statistics about the use of our Services.

**Published Support Requests:** And if you send us a request (for example, via a support email or one of our feedback mechanisms), we reserve the right to publish that request in order to help us clarify or respond to your request or to help us support other users.

**Sale or Transfer:** If we're discussing selling or transferring part or all of a business, we may share information about you to prospective purchasers - but only so they can evaluate that business. If we are reorganised or sold to another organisation, we may transfer information we hold about you to them, so they can continue to provide the services to you

**Publicly Shared Information:** Information that you choose to make public is, disclosed publicly. This means that any information like posts and other content that you make public on our system, will be public.

Remember - public information may also be indexed by search engines or used by third parties. Please keep all of this in mind when deciding what you would like to share.

## Security

We employ a range of security controls throughout our organisation to ensure that we look after your personal data and protect it from loss, corruption or unauthorised access. Our *Information and Personal Data Security Policy* which outlines our commitment to protecting your data can be supplied on request.

## Retention

We only retain data for as long as is necessary to satisfy the following requirements:

**Legal:** We are required to meet legal obligations in terms of retention periods for some data, such as financial records and information. (7 Years for any document relating to financial transactions)

**Contractual:** Your data will be retained for the duration of your contract, as required by us to fulfil our contractual obligations. Following the end of the contract term we retain your information and a period of 18 months for marketing and business analysis purposes.

**Marketing:** Where data is held for marketing purposes then we hold this for 18 Months of inactivity prior to destruction.

**Business Analysis:** Where data is held for business analysis purposes, data is limited to only that necessary to perform the analysis. We retain business analysis data for 18 Months

## Data Destruction/Erasure

We always aim to keep the amount of personal data we hold to a minimum and so, unless we have received a specific request from you to erase any of your data before the retention periods expire, we will either destroy or return to you any data that has reached the end of its retention period.



## Your Choices

You have several choices available when it comes to information about you:

**Limit the Information that You Provide:** If you have an account with us, you can choose not to provide the optional account information and transaction and billing information. Please keep in mind that if you do not provide this information, certain features of our Services may not be accessible (contact us for more information).

**Opt-Out of Electronic Communications:** You may opt out of receiving promotional messages from us. Just follow the instructions in those messages. You may still receive messages as part of the fulfilment of our contractual obligations or legal notices, if you also decide to opt out of these this could result in a significant reduction of service you obtain from us in the fulfilment of these obligations.

**Set Your Browser to Reject Cookies:** At this time, Key Marketing Services does not respond to “do not track” signals across all of our Services. However, you can usually choose to set your browser to remove or reject browser cookies before using Key Marketing Services’s website, with the drawback that certain features of Key Marketing Services’s website may not function properly without the aid of cookies.

## Your Rights

When it comes to personal data you have defined rights regarding how your data is collected, processed and shared. These rights are explained below:

**The Right of Access:** You have the right to request that we show you what personal data of yours we hold and process.

**The Right to Erasure:** In specific circumstances, you have the right to request that any data we hold on you be erased. This includes where:

- Your personal data is no longer necessary in relation to the purpose for which it was originally collected/processed.
- You withdraw consent.
- You object to the processing and there is no overriding legitimate interest for continuing the processing.

**The Right to Object:** There are cases where we may process some of your data in order to help us assess and improve our business. This type of processing may not be supported by a contractual requirement or your consent but would have been carefully assessed to ensure that we have a clear legitimate interest in doing so that does not adversely affect you as an individual.

In these instances, we make you aware of these activities along with your right to object to this kind of processing should you wish.

**The Right to rectification:** If you become aware that any data we hold is incorrect you have the right to request that this data be corrected

**The Right to Data Portability:** You have the right to request that we provide you with an electronic copy of any data you have given to us as part of a contractual relationship or following your consent. This also includes any data about you that has been generated automatically as part of these agreements.

**The Right to Restrict Processing:** In some situation you may require us to restrict processing, such as following an objection or if data accuracy is in question. Where you exercise your right to restrict processing we shall not recommence processing without first notifying you.

## Other Things You Should Know

### Transfer of Information outside of the EEA

From time to time we may transfer your personal information to our group companies, suppliers or service providers based outside of the EEA for the purposes described in this Privacy Notice. If we do this your personal information will continue to be subject to one or more appropriate safeguards set out in the law. These might be the use of model contracts in a form approved by regulators, or having our suppliers sign up to an independent privacy scheme approved by regulators (like the US 'Privacy Shield' scheme).

### Ads and Analytics Services Provided by Others

Ads appearing on any of our Services may be delivered by advertising networks. Other parties may also provide analytics services via our Services. These ad networks and analytics providers may set tracking technologies (like cookies) to collect information about your use of our Services and across other websites and online services. These technologies allow these third parties to recognise your device to compile information about you or others who use your device. This information allows us and other companies to, among other things, analyse and track usage, determine the popularity of certain content, and deliver advertisements that may be more targeted to your interests. Please note this Privacy Notice only covers the collection of information by Key Marketing Services and does not cover the collection of information by any third-party advertisers or analytics providers.

## Complaints

If you have any complaints about the way in which your personal data is being handled, then please contact us using the contact details below.

To contact Key Marketing Services about your personal data, you may contact the data controller at:

KPM Group  
Unit 4, Gateway Trading Estate  
London Rd  
Swanley  
BR8 8GA

Addressed to Nigel Copp – CEO, KPM Group  
Or call on 01322 663328  
Or email him directly at [nigel.copp@kpmgroup.co.uk](mailto:nigel.copp@kpmgroup.co.uk)

Alternatively, in the event that you feel we have not responded to you in a timely fashion or have not fully responded or complied with your requests you may also contact the national supervisory authority to register a complaint, their details can be found at <https://ico.org.uk>.