

# PRIVACY NOTICE

Welcome to the Compass Independent Publishing Services Limited (CIPS) privacy notice. CIPS Limited respects your privacy and is committed to protecting your personal data. This privacy notice will tell you how we use your personal data when you visit our website or contact us in any other way and tell you about your privacy rights and how the law protects you.

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## IMPORTANT INFORMATION, WHO WE ARE AND PURPOSE OF THIS NOTICE

This privacy notice aims to give you information on how we collect and process your personal data including any data you may provide through this website or to one of our employees. It is important that you read this privacy notice and any other privacy notice or fair processing notice that we may provide on specific occasions when we are collecting or processing personal data relating to you. This privacy notice is intended to be read together with other notices and is not intended to replace them. CIPS Limited is the data controller and is responsible for your personal data (referred to as: "the Company", "we", "us" or "our" in this privacy notice).

We have appointed a Data Protection Officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact them using the details set out below.

**Contact name:** Darina Brejtrova

**Address:** Compass Independent Publishing Services Limited, West Newington House, 10 Newington Road, Edinburgh EH9 1QS

**Email:** [Darina@birlinn.co.uk](mailto:Darina@birlinn.co.uk)

You have the right to make a complaint about how we have dealt with your personal data at any time to the Information Commissioner's Office (ICO) who is the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with any concerns you might have before you approach the ICO so please do contact us in the first instance if you have any concerns.

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## THIRD-PARTY LINKS AND PUBLISHERS WE REPRESENT

This website may include links to third-party websites (in particular those of the many publishers we represent), 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 our website, we encourage you to read the privacy notice of every website you visit.

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## THE DATA WE COLLECT ABOUT YOU

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). We may collect, use, store and transfer different kinds of personal data about you, including:

- **Identity Data:** which includes name, marital status, title, date of birth and gender.
- **Contact Data:** which includes billing address, delivery address, email address and telephone numbers.
- **Technical Data:** which includes your 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 and other technology on the devices you use to access this website.
- **Usage Data:** which includes information about how you use our website, products and services.
- **Marketing and Communications Data:** which includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. Our website is not intended for children and we do not knowingly collect data relating to children.

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 by contacting us at the address provided in this notice.

Where we need to collect your personal data by law, or to process your personal data under the terms of a contract we have with you and you fail to provide that personal data when requested, we may be unable to perform the contract that we have with you or that you are trying to enter into, e.g. to provide you with goods. If this is the case, we may have to cancel the provision of a product to you but will notify you if that is the case at the time.

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## COLLECTING PERSONAL DATA FROM YOU

We use different methods to collect data from and about you including:

- Direct interactions. You may give us your identity, contact 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: purchase our products or services; create an account on our website; request marketing to be sent to you or give us some feedback.
  - Automated technologies or interactions. As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.
  - Third parties or publicly available sources.
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## DATA FROM THIRD PARTY SOURCES

We may receive personal data about you from various third parties and/or public sources including:

- Technical Data from analytics providers (such as Google) based inside or outside the EU.
  - Technical Data from Advertising Networks (such as Facebook or Twitter) based inside or outside the EU.
  - Technical Data from Search Information Providers (such as Google or Yahoo) based inside OR outside the EU.
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside OR outside the EU.
  - Identity and Contact Data from data brokers or aggregators based inside or outside the EU.
  - Identity and Contact Data from publicly available sources (such as Companies House and the Electoral Register based inside the EU).
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## HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to do so. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract that we are about to enter into or have entered into with you, e.g. a contract to supply CIPS sales and marketing services to a client publisher.
- 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.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to receiving communications for the purposes of marketing at any time by contacting us at [sales@compass-ips.london](mailto:sales@compass-ips.london) You can also unsubscribe from receiving any email newsletters or other publicity information we may send you at any time, by directly responding to the sender of that email.

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## PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out in a table format below, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Please 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.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Retention period
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>	6 years
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>	6 years
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>	6 years

To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)	
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)	6 years

## PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage 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).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and, in each case, you have not opted out of receiving that marketing.

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## THIRD-PARTY MARKETING

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

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## OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you, replying directly to the sender of that message or by contacting us at [sales@compass-ips.london](mailto:sales@compass-ips.london).

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

## COOKIES

Along with most companies who have websites, the Compass website uses cookies. When you visit a website, a small file called a cookie asks permission to download to your computer. That cookie supplies information that will help Compass to analyse web traffic and allows web applications to respond to you as an individual. By using this information, we can provide all of our users with a better website experience. In common with most websites, there are three main types of cookies in operation here:

- **Session Cookies:** This cookie is used to remember your log in details and what you've added to your basket. These are necessary to ensure the website functions correctly.
- **Performance Tracking Cookies or Traffic Cookies:** This cookie is used to track visits and to identify the pages in use. This helps us analyse data about webpage traffic and improve our website in order to tailor it to our customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.
- **Social cookies:** This cookie allows you to share pages and products via social networks

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. For more information about cookies, how to identify them and how to delete them see: [www.aboutcookies.org](http://www.aboutcookies.org)

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## CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we have 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 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.

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## DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table above. In particular, we may share your data with:

- Our agents and advisors
- HM Revenue & Customs, regulators and other authorities
- Companies we have a joint venture or agreement to co-operate with
- Companies you asked us to share your data with
- Insurers

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. We do not transfer your personal data outside the European Economic Area (EEA).

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## **DATA SECURITY**

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 and they are subject to a duty of confidentiality.

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.

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## **DATA RETENTION**

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.

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.

Details of retention periods for different aspects of your personal data are set out in the table on page 4/5.

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## **YOUR LEGAL RIGHTS**

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

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent

If you wish to exercise any of the rights set out above, please contact the Data Protection Officer whose details are on the first page of this Privacy Notice. 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.

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