

# Privacy Notice

This is the privacy notice of [the Digital Future for Europe coalition](#), which is owned and operated by [Public First](#). In this document, "we", "our", or "us" refer to [Public First](#).

We are company number [10149826](#) registered in [the United Kingdom](#).

Our registered office is at [11 Tufon Street, London, SW1P 3QB](#)

## Introduction

This privacy notice aims to inform you about how we collect and process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information. It tells you about your privacy rights and how the law protects you.

We are committed to protecting your privacy and the confidentiality of your personal information. Our policy is not just an exercise in complying with the law, but a continuation of our respect for you and your personal information.

We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.

Our policy complies with the Data Protection Act 2018 (Act) accordingly incorporating the EU General Data Protection Regulation (GDPR).

The law requires us to tell you about your rights and our obligations to you in regard to the processing and control of your personal data. We do this now, by requesting that you read the information provided at <http://www.knowyourprivacyrights.org>

Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

## 1. Data Protection Officer

[We have appointed a data protection officer \(DPO\) who is responsible for ensuring that our policy is followed.](#)

[If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact our DPO, James Frayne at \[james@publicfirst.co.uk\]\(mailto:james@publicfirst.co.uk\)](#)

## **2. Data we process**

We may collect, use, store and transfer different kinds of personal data about you. We have collated these into groups as follows:

Your identity includes information such as first name, last name, title, date of birth, and other identifiers that you may have provided at some time.

Your contact information includes information such as email address, and any other information you have given to us for the purpose of communication or meeting.

We may aggregate anonymous data such as statistical or demographic data for any purpose. Anonymous data is data that does not identify you as an individual. Aggregated data may be derived from your personal data but is not considered personal information in law because it does not reveal your identity.

However, if we combine or connect aggregated data with your personal information so that it can identify you in any way, we treat the combined data as personal information and it will be used in accordance with this privacy notice.

## **3. If you do not provide personal information we need**

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 that contract. In that case, we may have to stop providing a service to you. If so, we will notify you of this at the time.

## **The bases on which we process information about you**

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant then we shall immediately stop processing your data.

If the basis changes then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

## **4. Information we process because we have a contractual obligation with you**

When you register your support for the Digital Future for Europe coalition on our website a contract is formed between you and us.

In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information.

We may use it in order to:

- verify your identity for security purposes
- provide you with our services
- provide you with information such as invitations to take part in research projects and attend events.

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

## **5. Information we process with your consent**

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, you provide your consent to us to process information that may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies.

If you have given us explicit permission to do so, we may from time to time pass your name and contact information to selected associates whom we consider may provide services or products you would find useful.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us [contact@publicfirst.co.uk](mailto:contact@publicfirst.co.uk). However, if you do so, you may not be able to use our website or our services further.

## **6. Information we process for the purposes of legitimate interests**

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having given careful consideration to:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so

For example, we may process your data on this basis for the purposes of:

- record-keeping for the proper and necessary administration of our [startup coalition](#)
- responding to unsolicited communication from you to which we believe you would expect a response

## **7. Information we process because we have a legal obligation**

Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

This may include your personal information.

## Specific uses of information you provide to us

### 8. Information provided on the understanding that it will be shared with a third party

Our website allows you to post information with a view to that information being read, copied, downloaded, or used by other people.

Examples include:

- Providing your personal contact details and information about your business for the use of the Digital Future for Europe coalition.

In posting personal information, it is up to you to satisfy yourself about the privacy level of every person who might use it.

[We do not specifically use this information except to contact you periodically.](#)

We do store it, and we reserve a right to use it in the future in any way we decide.

Once your information enters the public domain, we have no control over what any individual third party may do with it. We accept no responsibility for their actions at any time.

Provided your request is reasonable and there is no legal basis for us to retain it, then at our discretion we may agree to your request to delete personal information that you have posted. You can make a request by contacting us at [contact@publicfirst.co.uk](mailto:contact@publicfirst.co.uk)

### 9. Communicating with us

When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our [organisation](#).

[We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high quality service.](#)

## 10. Complaining

When we receive a complaint, we record all the information you have given to us.

We use that information to resolve your complaint.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

## Disclosure and sharing of your information

### 11. Data may be processed outside the European Union

Our websites are hosted in [the United Kingdom](#).

We may also use outsourced services in countries outside the European Union from time to time in other aspects of our business.

Accordingly data obtained within the UK or any other country could be processed outside the European Union.

[For example, some of the software our website uses may have been developed in the United States of America or in Australia.](#)

We use the following safeguards with respect to data transferred outside the European Union:

- [the processor is within the same corporate group as our business or organisation and abides by the same binding corporate rules regarding data processing.](#)
- [the data protection clauses in our contracts with data processors include transfer clauses written by or approved by a supervisory authority in the European Union \[, specifically that in the country of ...\].](#)
- [we comply with a code of conduct approved by a supervisory authority in the European Union \[, specifically that in the country of ...\].](#)
- [we are certified under an approved certification mechanism as provided for in the Act.](#)

- both our organisation and the processor are public authorities between whom there is either a legally binding agreement or administrative arrangements approved by a supervisory authority in the European Union relating to protection of your information.

## **Control over your own information**

### **12. Your duty to inform us of changes**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes.

### **13. Access to your personal information**

At any time you may review or update personally identifiable information that we hold about you, by signing in to your account on our website.

To obtain a copy of any information that is not provided on our website you should contact us to make that request.

After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

### **14. Removal of your information**

If you wish us to remove personally identifiable information from our website, you should contact us to make your request.

This may limit the service we can provide to you.

### **15. Verification of your information**

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

## Other matters

### 16. Encryption of data sent between us

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us.

Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

### 17. How you can complain

If you are not happy with our privacy policy or if you have any complaint then you should tell us.

If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.

If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office (ICO). This can be done at <https://ico.org.uk/make-a-complaint/>. We would, however, appreciate the opportunity to talk to you about your concern before you approach the ICO.

### 18. Retention period for personal data

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- to provide you with the services you have requested;
- to comply with other law, including for the period demanded by our tax authorities;
- to support a claim or defence in court.

### 19. Compliance with the law

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you.

However, ultimately it is your choice as to whether you wish to use our website.

## **20. Review of this privacy policy**

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please [contact us](#).

Explanatory notes

## Privacy policy notice

### General notes

The EU Data Protection Directive (95/46/EC), implemented as the General Data Protection Regulation, or the GDPR, came into force from 25 May 2018.

In the UK, the rights and obligations that the GDPR brought are written into a new law called the Data Protection Act 2018. The Act remains in force even after the UK leaves the European Union.

The requirements under the new law are similar in extent to prior data protection law in the UK. If your business complies with prior law, then the changes you need to make are likely to be small.

The possible implications for non-compliance are now much more severe. In theory, the Information Commissioner's Office (the ICO) has the power to fine a business 4% of its annual worldwide turnover.

However, as with other EU law regarding selling to consumers we believe that the ICO in practice is unlikely to fine many small businesses and organisations without having first given a warning. Having a privacy notice (such as one based on this template) that shows some effort to comply with the law is likely, in our opinion, to generate enough goodwill with the ICO to avoid a fine in the first instance.

Updating your website privacy notice is not the only requirement for compliance with the Act. You are also likely to need to change how customers and visitors can access personal data held about them, and create new procedures for obtaining compliance to collect and use personal data.

You may also need to update other legal documents, in particular, your website terms and conditions. Free versions of these are also available from our website.

More information can be found at: <https://www.netlawman.co.uk/ia/gdpr>

### Using this template as the basis for your privacy notice

Your privacy policy should be concise (while also being comprehensive), transparent, easy to understand and easily accessible.

We aim to balance those qualities in this document. However, we cannot know exactly how your business works, so you may need to edit the document significantly in certain places.

We offer this template free as an example of a Net Lawman document. We hope that you like it, and that you may buy other documents and services from us in the future.

Regardless of the price, we assert our copyright in the document. Our standard licence terms apply. While you may not distribute the template without including our copyright, **you may remove our copyright notice from the version you edit and use.**

In addition to these paragraph specific guidance notes to help you edit the template, we also publish a free, more general guide to editing our legal documents, which you can download at: [https://www.netlawman.co.uk/uploads/Editing\\_Legal\\_Document\\_Templates.pdf](https://www.netlawman.co.uk/uploads/Editing_Legal_Document_Templates.pdf)

If you have any questions, please contact us at [support@netlawman.co.uk](mailto:support@netlawman.co.uk)

## Paragraph specific notes

Numbered notes refer to specific numbered paragraphs in the template.

### Identification of the owner of the website

The Act requires that you identify the business or the organisation that operates the website. Using the domain name as the business name is not enough. You need to provide a business or organisation name and an address.

In practice, you may decide that you do not want to provide your name and address (for your own privacy reasons). You may be more likely to get away with doing this if you don't trade from your website.

If you have appointed a data protection officer, you should name that person here using words such as "Our Data Protection Officer is [Name]". Most businesses or organisations that use this template will not be large enough to require one.

### Introduction

Leave these items in place unless there is a good reason to edit or remove. Each of these items has been carefully considered in the context of this document and has been included for a purpose.

The first paragraph sets out the purpose of the document and explains terms used throughout it.

The second and the third paragraphs aim to reassure readers that you take privacy seriously.

The fourth paragraph demonstrates awareness of the Act and compliance. It should also reassure visitors since "GDPR" is a term for which they will look.

A key requirement of the law is that you tell your visitors and customers that they have rights with respect to how their personal information is processed. Rather than cluttering your privacy notice with an explanation of their rights, we recommend referring your visitors to this explanatory website.

## **1 Data protection officer**

Unless your organisation processes large volumes of personal information, you are unlikely to be required to appoint a data protection officer.

If you have nominated an individual, you may mention him or her in this paragraph.

Otherwise, you can delete this section.

## **2 Data we process**

The Act only applies to personal data.

Any of these paragraphs can be deleted or edited, although the ones in blue are most likely to be those that either do or don't apply.

## **3 Special personal information**

If you process certain types of personal information, you are required to disclose that you do so.

Use either the first two sentences or the last one.

## **4 If you do not provide the personal information we need**

This is a reminder to your customer or visitor that you may not be able to provide services if you are not given information.

### **The bases on which we process information about you**

A requirement of the Act is that you tell the data subject why you process the data and which legal basis you have chosen to use as the justification to process his or her data.

Most websites will process different types of data on different bases. The two most likely to apply are "Contract" (after the visitor has accepted your terms and conditions) and "Consent" (after the visitor has agreed to your use of his or her data – usually by taking some affirmative action such as clicking on a button). Some data may also be processed because of a legal requirement or a legitimate interest.

All the bases are described at: <http://www.knowyourprivacyrights.org/legitimate-uses/>

The reasons why you process the data arise as a result of the basis. If there is a contract, there is a contractual obligation to carry out the service. If the basis is

consent, then there will probably be some benefit to the data subject of you using the information.

You may want to edit these sections in minor ways (certainly where we have highlighted in blue).

More importantly, you should make design changes to how your website works so as to obtain explicit consent, or have a visitor agree to your terms earlier in your relationship.

For most websites, contract is the strongest basis for processing. If you can design your website experience such that a visitor agrees to your terms early on, before providing personal information, you will have fewer grounds for complaints. For example, you might reduce the requirement to provide detailed information when a visitor registers a basic account on your website, but place more content or functionality in an area of the website that requires the visitor to have such an account. At the registration point, the visitor must tick a box to say that he or she has read and agrees to your terms and conditions.

If you are relying on consent, then you might design a banner to appear when a visitor first arrives at your site (for example, encouraging him or her to read your cookies policy). That banner might have two buttons – one that gives explicit agreement and one that doesn't. If the visitor does not give explicit consent, then you redirect him or her to another "safe" website or state that certain functionality will be limited.

Positive action needs to be taken by the visitor when agreeing to anything – pre-ticked boxes or close buttons don't count as affirmative action.

Legitimate Interests is a basis that is fairly subjective. For it to be used, you must have decided that there is a legitimate interest, that processing the data is necessary to protect that interest, and that the data subject's interests (or other interests) do not override it. In some circumstances, it is most appropriate, but if possible, we would recommend using Contract or Consent as better alternatives. The reason is simply that the data subject is less likely to complain if he or she has clearly asked you to process his or her data.

Data subjects have a legal right to see the personal information you hold about them. You need both an internal process as to how to provide this, and a means for the data subject to request the information.

If the data subject is a registered visitor, then providing his or her data in an account area is a good way of providing this data. You can also provide a way of giving consent to use of the data in the same place.

If the data subject does not have an account, then you should give either an e-mail address or a physical address to which the data subject can send a request for his or her information.

Lastly, for each basis you need to state when you stop processing the data. We suggest that you don't edit our text.

### **Specific uses of information you provide to us**

This section provides more information about specific types of information. The paragraphs within it are as much designed to reassure a visitor reading your policy than to aid compliance with the law.

#### **9 Information provided on the understanding that it will be shared with a third party**

This paragraph serves as a reminder that information that a visitor posts on your website may be available for public viewing, and that you cannot be held responsible if someone else copies it and uses it without the author's permission.

It creates a licence for you to use it in any way you wish, which may be useful.

You should provide a way for someone to contact you and request that content is removed. This could be as simple as an e-mail address.

#### **10 Complaints regarding content on our website**

This paragraph is a reminder to visitors that moderation of all user generated content is not always viable.

It shows that you take complaints about content seriously, and also that a decision to remove content remains with you.

#### **11 Information relating to your method of payment**

There are two options here. Delete whichever is not relevant.

The first covers the situation where you do record card information. You should edit the "measures to protect your information" so that they are relevant to your business.

The second covers the situation where card information stays with the payment service provider.

If you don't take payment at all, of course delete this paragraph completely.

#### **12 Information about your direct debit**

If you do not take payment by direct debit, delete this paragraph. Otherwise edit the wording in blue appropriately.

### **13 Job application and employment**

The purpose of this paragraph is to set out for how long personal information is processed. It is a requirement of the Act.

### **14 Communicating with us**

We suggest you keep this paragraph in your notice. However, you should edit it to suit how your organisation works.

### **15 Complaining**

This paragraph deals with how information collected as a result of a complaint is used. It should not be confused with an explanation of how to complain (which is dealt with later). We suggest you leave this paragraph as is.

### **16 Affiliate and business partner information**

Information relating to affiliates is not subject to the Act. This paragraph should reassure business partners.

### **17 Cookies**

The start of this paragraph is an explanation of what cookies are.

It is good practice to display a message when a visitor first comes to your website asking whether he or she accepts use of cookies. The paragraph in blue supports this.

We take the approach here of not listing every single cookie.

The reason is that you not know this information yourself, especially if you use third party add-ons or plug-ins to your website. For example, Google provides visitor tracking software (Analytics) that is popular. It could at any point change the name or purpose of the many cookies it uses without telling you.

There are so many cookies that software you use is likely to place that to list them here would increase the size and complexity of the notice, and to keep the notice up-to-date as they change would be time consuming.

Listing every cookie's file name, purpose and expiration period could be done in a separate cookie notice, linked from this paragraph.

We prefer the approach of explaining in what ways they are used. Add or delete to this list as appropriate.

## **18 Personal identifiers from your browsing activity**

Most web servers log requests for pages. We suggest you leave this paragraph as is, even if you don't use this information.

## **19 Our use of re-marketing**

Re-marketing is the name given to the practice of advertising your products and services on third party websites based on pages on your website that the visitor has already seen.

It requires you as the website owner to be the client of an advertising service provider.

When a visitor visits a page of your website, the advertiser's software through your website places a cookie on the visitor's computer. When he or she visits another webpage on a third party website, you can choose whether or not to pay to show him or her an advert for your product or service.

For example, you might sell fruit from your website. A visitor visits a page about the health benefits of eating a particular tropical fruit. Later, the same visitor visits another website about cookery, and specifically a page that describes a recipe that requires the tropical fruit. Both your website and the cookery website use the same advertising service provider. You can choose to pay to have your adverts for that tropical fruit to be displayed on the cookery website.

The advertising service provider usually allows you to specify exactly what criteria must be met in order to display your advert, making re-marketing a cost efficient way of advertising.

Some people feel very strongly about re-marketing. It can elicit fears of "being followed around the web", particularly if the topic of the advert is sensitive.

You can choose to delete this paragraph entirely if you do not use re-marketing. However, keeping it in place will allow you to experiment with different types of display marketing later.

## **Disclosure and sharing of your information**

### **20 Information we obtain from third parties**

This paragraph is a reminder to visitors that you may use third party information provision services. Delete if not appropriate to your organisation.

### **21 Third party advertising on our website**

Delete if not appropriate to your organisation.

## **22 Credit reference**

We suggest that you leave this paragraph in place even if you have no immediate intention of liaising with debt collectors. It may be a useful “reminder” to users of your website.

## **23 Data may be processed outside the European Union**

It is a legal requirement to tell the visitor if his or her information is processed outside the EU. It is especially important if you have your own business operations outside the EU.

If you want to be as compliant as possible, you should also identify carefully whether you use services outside the EU. You may use, for example, a US-based online software service to provide your chat system.

In practice, it might be very difficult to identify exactly where software has been written, whether the software house processes your data in any way, and where this might take place.

The clause giving examples (in blue) could be deleted entirely if you don't want possibly to mislead readers.

The safeguards (bullet points at the end of the paragraph) seem verbose, but are copied verbatim from the legislation. Choose the most appropriate (one, maybe two) and delete the others.

## **Control over your own information**

Under the Act, a data subject has a right to access information about him or her, and a right for that information to be kept up-to-date and only for as long as required.

You should leave these three paragraphs in place, editing the addresses.

## **Other matters**

### **28 Use of site by children**

Under UK law, you cannot form a contract with a child. So a child cannot agree to your terms and conditions, which means that he or she cannot agree to your terms regarding use of his or her information. Additionally, only a parent or guardian can give consent.

So it is very difficult to have a lawful basis for processing personal information about children.

Additionally, personal information about children is regarded as more sensitive than the same information about an adult. The consequences for data breaches could be much greater.

We suggest you edit this paragraph to suit your website and keep it in.

### **29 Encryption of data sent between us**

This paragraph is included to reassure visitors. If you do not use SSL then remove the paragraph.

### **30 How you can complain**

This paragraph sets out standard wording that tells visitors how to make a complaint.

It gives you a stronger argument to use arbitration or mediation as a means of resolving a complaint, rather than going to court.

In any case, you must tell visitors to your site about their right to complain to the supervisory body, the Information Commissioner's Office.

### **31 Retention period for personal data**

It is a requirement of the Act to tell data subjects for how long personal information will be kept. This paragraph is a catch-all if the information is not provided elsewhere.

Basic UK law relating to limitation for bringing a claim, contract matters, tax and other areas often requires data to be retained for six years. You will be "safe" if you specify that period for commercial transactions.

### **32 Compliance with the law**

Leave this paragraph in place.

### **33 Review of this privacy policy**

Leave this paragraph in place.

## **End of notes**