

# HOLYROOD COMMUNICATIONS PRIVACY NOTICE

## Who are we?

Holyrood Communications Ltd is a subsidiary of Political Holdings Ltd and part of the Total Politics Group. Holyrood Communications is registered in Scotland under company number **SC200011** and our registered office is **Panmure Court, 32 Calton Road, Edinburgh, EH8 8DP**. We are committed to protecting your privacy and keeping any personal data you provide to us confidential at all times, in accordance with UK data protection laws. This Privacy Notice sets out the information processing activities that Holyrood Communications carries out in its capacity as data controller.

All personal data collected by Holyrood Communications is processed in compliance with the requirements of the UK General Data Protection Regulation, the UK Data Protection Act 2018 and any other relevant legislation such as the Privacy and Electronic Communications Regulation 2003 (PECR).

## How is your information collected?

Personal data is any information about an individual from which that person can be identified. The personal information that we may collect about you broadly falls into the following categories:

### Information that you provide voluntarily

We may process and store information that you have provided voluntarily. For example, when you sign up to our newsletter, events or training courses, we will ask you to provide some business contact details including your job title and email address. It will be clear to you at this point what personal data you are providing.

### Information that we collect from your activities

We collect information about how you use our website automatically through the use of cookies and other technologies. Some of these cookies can be enabled/disabled by selecting your preferences in the preference centre you are presented with when first interacting with this site. More information on cookies can be found under the 'Use of cookies' section below.

As a group company we share centralised systems and platforms within the Total Politics Group. Unless you object to such processing, or request us not to, the below table describes (i) the information shared with our group companies; and (ii) the type of commercial communications you may receive from our group companies.

Total Politics Group Company	Commercial Communication	Group Companies Information is Shared With
Holyrood Communications Limited	Email sales and marketing, Telephone sales and marketing, PPC advertising, Print advertising, Display advertising, Direct marketing (e.g. printed invitations), and Social media	Political Engagement Limited

### How is your information used?

We will only process (use) your personal information where:

- we have a 'legitimate interest' to do so in order to support our company aims. Our use will be fair and balanced and never unduly impact on your rights;
- we have a contract with you that we can only fulfil by using your personal information, e.g. to register you for an event;
- we have asked your consent for us to do so.

The table below highlights the types of personal data that we use, what we use them for and the lawful basis for processing.

Purpose	Type of data	Lawful Basis for processing
To Promote Products, Services and Events.	Name, Job Title, email address, contact numbers, organisation name, location (country)	Legitimate Interest, to help you in your role including information, learning and development
Online Event Registration	Name, Job Title, email address, contact numbers, organisation name, location (country)	Legitimate Interest, to help you in your role including information, learning and development
Website Registration	Name, Username, Job Title, Work Address, Employer, Contact Details and Payment Details	Legitimate Interest, to help you in your role including information, learning and development
Website interfacing (i.e. posting comments on articles/group discussions)	Name and Username	Legitimate Interest, to help you in your role including information, learning and development
Website usage including for monitoring and improving our websites	IP Address, Browser Data, Traffic and Location Data	Legitimate Interest, to help you in your role including

		information, learning and development
Contacting us through the website (emailing us or commenting through website)	Name, Email Address and Comments	Legitimate Interest, to help you in your role including information, learning and development
Surveys	Information included within survey, Name, Phone number, Job Title and Employer	Consent
Whitepapers, Research and Webinars	Recording and details of your call, name, email address, phone number, gender, address, employer, job title and any other information you provide.	Consent
Newsletters	Your name, job title, phone number, employer, and any other information that you provide.	Consent
Email and Social Media Interactions	Name, Contact Details, Gender, Address.	Legitimate Interest, to help you in your role including information, learning and development
Attendance at Events	Name, Job Titles, Email Address, Photos/Videos Taken at the Event	Legitimate Interest, to help you in your role including information, learning and development

### Who we share your information with

We may disclose your personal information to the following categories of recipients:

- to service providers who manage aspects of our operations (e.g. technical services for our Websites, on-site registration providers for our events/training or those that assist us in providing services to you);
- in order to investigate or respond to problems or inquiries or defend our interests, to our auditors, brokers, legal advisors, professional indemnity insurers, and other professional advisors;
- in the event of a sale, merger, acquisition, partnership or joint venture;
- in order to comply with any legal obligation, or where it is required by order of a court or other judicial, regulatory or law enforcement body or in order to enforce or apply the Websites' terms of use and/or other agreements between you and us; or
- to protect our or a third party's rights, property or safety.

We may also pass aggregated information on the use of the Websites to our group companies or third parties but this will not include information which could be used to identify you.

If you (i) register to attend an event or training event we organise; and/or (ii) sign up for a webinar, whitepaper or bulletin, we may provide the contact information you provide to sponsors, event partners, exhibitors and/or a venue for an event who may contact you from time to time for their marketing purposes. A list of event sponsors will be available on each event website. Further details of how we hold and use personal data for our events are provided in a Privacy Notice, which is available on each events registration page.

We will not sell or rent your personal information to third parties. Where we share your information with third parties, we will ensure:

- we provide only the information they need to perform their specific services.
- they may only use your data for the exact purposes we specify in our contract with them.
- we work closely with them to ensure that your privacy is respected and protected at all times.
- if we stop using their services, your data held by them will either be deleted or rendered anonymous.

### **International data transfers**

The Group is a global business which means personal information may be accessed by our group companies or certain service providers from locations outside the European Economic Area (EEA). To ensure your information is given substantially similar protection as are provided in the EEA we use safeguards approved by the European Commission and have in place international data transfer agreements between our companies and our service providers where data is transferred outside the EEA.

If you would like more information about the appropriate safeguards, please contact us at [dpo@totalpolitics.com](mailto:dpo@totalpolitics.com)

### **How long will we hold information about you?**

We only hold information about you for as long as it is needed for the purpose(s) it was collected, or as required by law.

Once we have received your information, we will use, and keep up to date, strict and appropriate measures, procedures and security features (technical or otherwise) to ensure the security of personal information and to try to prevent access by unauthorised persons and any unlawful processing, accidental loss, destruction or damage, including the implementation of an appropriate system security policy.

We retain the information you provide us for marketing purposes for three years from last contact. For all other personal information provided, we retain it for the length necessary for the purposes for which the information was provided and as permitted by applicable laws. Where the information relates to a contract or our legal obligations it is retained for 6

years. We may retain the information once the purpose expired where we have a legitimate business ground to do so. The length of retention will depend on the purposes for which it is retained, though we will endeavour to delete or securely destroy your personal information where we no longer require it.

Although we take reasonable measures to protect your personal information, we cannot guarantee the security of your data transmitted to the Websites because this transmission is not under our control.

### **How and when will you hear from us**

We may use your contact details to update you about the latest news and events from Holyrood Communications.

#### Email and text

With your consent, or whenever you purchase with us and do not opt out of receiving our updates, we will use your contact details, preferences and details of your transactions to keep you informed by email and text about relevant products and services including tailored special offers, discounts, promotions, events, competitions and so on. This does not apply to service communications (see below).

You can opt out of our marketing communications at any time by clicking the “unsubscribe” link in any of our emails or by contacting [customer.service@totalpolitics.com](mailto:customer.service@totalpolitics.com)

### **Your rights**

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

**Your right to withdraw consent** - If the lawful basis for processing is consent, you have the right to withdraw that consent at any time. Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent, and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent

may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain services to you.

**Your right to object to direct marketing** - Where your personal data are processed for direct marketing purposes, you have the right to object at any time to processing of your personal data for marketing, which includes profiling to the extent that it is related to such direct marketing.

You also have the right to object to and not to be subject to a decision based solely on automated processing including profiling. On occasion, we may use profiling to better define the audience for an event, to ensure relevance and legitimate interest. This could be based on gender, location or ethnicity.

To exercise any of these rights, please contact [customer.service@totalpolitics.com](mailto:customer.service@totalpolitics.com).

### **Cookies:**

Cookies are small text files that are placed on your computer by websites or apps that you visit. They are often used to make sites that you visit work more efficiently.

A cookie may contain an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser when you visit a website or app. Sometimes this identifier may be sent back to the server each time a new page is requested. This information helps the website owners understand visitor behaviour.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date. A session cookie will expire at the end of the user session, when the web browser is closed.

To find out more about cookies, including how to see what cookies have been set, please visit our cookie notice here: <https://www.holyrood.com/docs/cookie-policy.pdf>

### **Making a complaint**

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling 0303 123 1113 or online at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)

### **Contact us**

If you have any queries regarding this policy, our website or services, please contact us at [customer.service@totalpolitics.com](mailto:customer.service@totalpolitics.com), via phone on +44 (0)20 7593 5669 or write to us at

### **Holyrood Communications**

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