

## Data Protection and Retention Policy for the HUBDOT Newsletter

### IMPORTANT INFORMATION AND WHO WE ARE

We are the Hub Dot London Limited of 74 Perrymead Street, London SW6 3SP trading as HUBDOT. For the purposes of data protection legislation, we will be the “controller” or “data controller” of all Data held in respect of this Policy.

HUBDOT (“we”/“us”/“our” etc) is committed to protecting the privacy of all personal data collected in the course of our business, this includes your data. We will at all times ensure that the minimum amount of personal data is kept, and for no longer than necessary, for us to meet our document retention objectives and data protection obligations.

This Data Protection and Retention Policy sets out how we will collect and retain personal data in relation to our Newsletter and is an important part of our data protection compliance processes. It should be read alongside our other Data Protection and Retention Policies, which can be found on the HUBDOT website.

We will always comply with relevant Data Protection Legislation (including the Data Protection Act 1998 (“DPA”) and General Data Protection Regulation (“GDPR”) as applicable) when dealing with your personal data. Further details on the DPA and GDPR can be found at the Information Commissioner’s Office website ([www.ico.gov.uk](http://www.ico.gov.uk)).

All breaches of this Policy should be reported to our Data Protection Administrator Catalina Silva Griffin at [catalina@hubdot.com](mailto:catalina@hubdot.com), to whom all queries regarding this Policy should also be addressed.

### WHAT DATA DO WE COLLECT?

Personal data 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 which we have grouped together as follows:

- (i) **Identity Data** includes first name, last name, and title.
- (ii) **Contact Data** includes your address (your city of residence) and email address.
- (iii) **Technical Data** includes internet protocol (IP) address, 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.
- (iv) **Usage Data** includes information about how you use our Newsletter.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We only collect 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) if you share it with us as part of your Story.

### HOW WE COLLECT PERSONAL DATA

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

1. **Direct interaction.** You may give us your Identity and Contact Data by filling in the Newsletter subscription form. You may also give us Special data if you include this in the ‘Story’ section of the Newsletter subscription form.
2. **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical and Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.

### WHY WE COLLECT PERSONAL DATA

We have set out below, in a table format, 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.

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
To register you as a subscriber to the HUBDOT newsletter	(i) Identity (ii) Contact	Performance of contract with you ( to provide you with the newsletter)
To send you the HUBDOT newsletter	(i) Identity (ii) Contact	Performance of contract with you ( to provide you with the newsletter)
To manage our relationship with you, which will include notifying you about changes to our data retention and protection policy	(i) Identity (ii) Contact	(a) Performance of a contract with you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this newsletter (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(i) Identity (ii) Contact (iii) Technical	(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)  (b) Necessary to comply with a legal

		obligation
To deliver relevant newsletter content to you and measure or understand the effectiveness of the content we serve to you	(i) Identity (ii) Contact (iii) Technical (iv) Usage	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)
To use data analytics to improve our newsletter, products/services, customer relationships and experiences	(iv) Technical (v) 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)

HUBDOT is all about making connections. In the future we may ask subscribers to our newsletter if they would like us to facilitate connections for them. We will never do this without your explicit consent. Any discussion about making connections will come with its own data policy.

We do not do targeted marketing, any recommendation of a third party in our newsletter is for our whole community. We do not target our recommendations at individuals.

#### *Change of purpose*

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

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **WHEN WILL WE SHARE YOUR DATA?**

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

- (a) Mailchimp (view their privacy policy here <https://mailchimp.com/legal/privacy/> )
- (b) Touchpoint (view their privacy policy here <http://www.touchpoint.marketing/privacy> )

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.

#### *Third party links*

The Newsletter may include links to third-party websites, 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.

## **INTERNATIONAL TRANSFERS**

We do not transfer your personal data outside the European Economic Area (EEA). Our subscribers do come from all over the globe but our Newsletter is created in London and all data connected with the Newsletter is kept in the EU.

## **OPTING OUT**

You can ask us to stop sending you the Newsletter at any time by clicking unsubscribe on our Newsletter or by contacting us at any time.

## **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, volunteers, 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.

## **HOW LONG WE KEEP DATA FOR**

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.

Our Data Protection Administrator will monitor and enable our process of identifying which records and information have met their required retention period and will supervise their destruction.

In general we will retain your data until you unsubscribe from the Newsletter. Once you have unsubscribed we may retain your data for up to 6 months to ensure that your data has been deleted or anonymised in all locations.

We will delete or anonymise your data once you have unsubscribed.

## **YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. If you wish to exercise any of these rights, please contact us.

In particular, you have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

In addition, you have the right to **take any complaints** about how we process your personal data to the **Information Commissioner**:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire SK9 5AF

<https://ico.org.uk/concerns/>

0303 123 1113.

#### *No fee usually required*

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

#### *What we may need from you*

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.

#### *Time limit to respond*

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.