Last updated: May 2018



Media Privacy Statement

Lemongrass Marketing is aware of its obligations under the General Data Protection Regulation (GDPR) and is committed to protecting your privacy. This privacy notice sets out, in line with GDPR, how and why we collect your personal data and how it is used.

Personal data we collect

Lemongrass Marketing may collect personal data from you in the form of:

- your name, email address and phone numbers when searching external media databases to
 identify key influencers to work with us on client projects. This information will only be added
 to our internal databases where we have identified a lawful basis to do so and will be deleted
 wherever the information sits idle for a period exceeding 12 months.
- your passport details when organising site visits to our client properties. We will always make you aware in advance when it is necessary for us to process your data in this way and this data will be deleted immediately at the completion of the aforementioned trip.
- your emergency contacts, next of kin information and if relevant any medical information we
 need to be aware of when organising site visits to our client properties. These details will only
 be shared in the event of an emergency, or with your explicit consent, and will be stored
 securely internally for the duration of a trip only and deleted on completion of any trip
- photographs may be taken of participants on site visits to our client properties or during other
 meetings with key influencers but we will always make you aware in advance when we seek
 to process your data in this way. This data would then become the property of Lemongrass
 Marketing to be used as appropriate.

How we collect your data

- Lemongrass Marketing subscribes to a media database, from which we are able to identify and get in contact with key influencers who have legitimately subscribed to its services
- Lemongrass Marketing will request further information directly from you when participating on site visits to our client properties or when commencing work with us on other client projects

How we process your data

Lemongrass Marketing will only process your data as far as is necessary for the relevant purpose, and only when we are satisfied that there is no other reasonable way to achieve that purpose.

In this instance Lemongrass Marketing will process your data for the following purposes:

- It will be necessary for Lemongrass Marketing to share personally-identifying information with our clients in order to arrange site visits to our client properties, as well as to secure the safety of participants on the aforementioned trips
- With your consent Lemongrass Marketing may also share your information with an external Corporate Travel Provider in order to book the necessary transport to enable the trip to take

Lemongrass Marketing Summertown Pavilion, 18-24 Middle Way Oxford, OX2 7LG United Kingdom place. If this happens, in certain circumstances your details may be disclosed to overseas recipients such as the overseas travel service provider (e.g. airlines, accommodation or tour providers) with whom they seek to make a booking. Your personal information will only be disclosed to other service providers in connection with facilitation of your travel booking and/ or to enable the performance of administrative and technical services on your behalf.

- Where additional activities are arranged on site visits Lemongrass Marketing will share personally-identifying data with third parties to the extent required to enable participation on the activities in question
- Lemongrass Marketing will process your information in order to report on and internally monitor activities carried out on behalf of our key influencers for our clients
- In order for Lemongrass Marketing to process invoices for flight reimbursement we will need to process this information through our third party financial software, which may at times allow access to its sub-processors to perform critical services such as helping to prevent abuse and providing customer support
- Where consent is given Lemongrass Marketing may use photographs it has taken of key influencers on its social media pages, the company website and in company marketing materials
- Lemongrass Marketing may send key influencers that we engage with invitations, electronic and paper mailings in order to communicate and supply key product information to them on its clients
- Lemongrass Marketing may make a record of the preferences that you choose to share with
 us to ensure that we send you the most relevant data/ information when considering you for
 future projects with our clients

Special categories of data

We must process special categories of data in accordance with more stringent guidelines. Most commonly, we will process special categories of data when the following applies:

- you have given explicit consent to the processing
- we must process the data in order to carry out our legal obligations
- we must process data for reasons of substantial public interest
- you have already placed the data in the public domain.

Who we share personal data with and why

Lemongrass Marketing will never share your personal data other than in the ways outlined in this Privacy Statement and never without your explicit consent, unless there is a lawful basis on which to do so.

Protecting your data

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such. Where we share your data with third parties, we provide written instructions to them to ensure that your data is held securely and in line with GDPR requirements. Third parties must also implement appropriate technical and organisational measures to ensure the security of your data.

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How long we keep your data for

In line with data protection principles, we will only ever hold your data for as long as we need to for the relevant purpose.

Your rights in relation to your data

The law on data protection gives you certain rights in relation to the data we hold on you. These are:

- **the right to be informed** This means that we must tell you how we use your data, and this is the purpose of this privacy notice
- the right of access You have the right to access the data that we hold on you. To do so, you should make a subject access request. You can read more about this in our Subject Access Request policy which is available to view here
- the right to rectification If any data that we hold about you is incomplete or inaccurate, you have the right to ask us to amend it
- the right to have information deleted If you would like us to stop processing your data, you have the right to ask us to delete it from our systems where you believe there is no lawful reason for us to continue to process it
- the right to restrict the processing of the data For example, if you believe the data we hold is incorrect, we can stop processing the data (whilst still holding it) until we have ensured that the data is correct
- the right to portability You may transfer the data that we hold on you for your own purposes
- **the right to object** You have the right to object to the way we use your data where we are using it for our legitimate interests
- the right to regulate any automated decision-making and profiling You have a right not to be subject to automated decision making in any way that adversely affects your legal rights.

Please note: If you would like to exercise any of your rights outlined above please contact us at privacy@lemongrassmarketing.com outlining your request or concerns.

How to withdraw your consent for us to use your data

Where you have provided us with consent to use your data, you have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to use the data where we are permitted by having a lawful reason to do so.

If you wish to exercise any of the rights explained above, please contact the Office Manager at privacy@lemongrassmarketing.com

Making a complaint

If you believe that the organisation has not complied with your data protection rights, you can complain to the Information Commissioner.

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