



Publishing Events' Privacy Policy

Date of Issue: May 2018

CONTENTS

A) Privacy notice for clients	2
B) FAQs for clients	3
C) PE's standard confidentiality and data protection terms	6
D) Data policy for clients' exhibitors/members	8
E) PE's data map/flow	12

A) Privacy notice for clients

Publishing Events (PE) is a specialist contract publisher with over 20 years' experience of working with Event Organisers ('EOs') and Trade Associations ('TAs') to produce their media products.

We are committed to protecting and respecting your customers' (exhibitors/members) personal information in accordance with applicable data protection laws, including the General Data Protection Regulation (the 'GDPR').

We only use the data you provide us with to perform services you have contracted us to fulfil in producing your show guide/membership directory (namely contacting exhibitors and members by telephone and email for purposes of providing current exhibitor/member information and offering PE's official products and services), which are an integral part of your customers' exhibiting or member experience and which they expect from you.

For the purpose of applicable data protection laws Publishing Events Ltd, 2nd Floor, Chapel House, 18 Hatton Place, London EC1N 8RU, is the Data Processor ('DP') and the EO/TA is the Client Data Owner/Controller ('CDO').

'Personal Information' means any information relating to an identified or identifiable natural person, an identifiable natural person being one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Our Privacy Policy explains how we use the information provided to us by you, how we protect that information, and your customers' legal rights in relation to their information. We are committed to abiding by this Privacy Policy, as well as the requirements of applicable laws, in the operation of our business.

B) FAQs for clients

How we use your customers' personal information

As the Data Processor, we use the GDPR-compliant data provided by you¹ for the purposes of providing exhibitors/members with services related to the exhibition/membership. These services include contacting exhibitors and members for their complimentary profile submission within the official publication(s), promoting the advertising media options within the official publication(s) and processing payments for any of these services as required.

Only qualified PE employees have access to and may use your customers' data for these aforementioned purposes, where this is necessary for their job role, and they are obliged to keep the personal data confidential. We perform appropriate privacy training (including as may be required by the data protection laws) for all employees that process any personal information.

Do you expect opt-outs / data issues post GDPR?

No. We only process qualified personal information (provided by an exhibitor/member company employee to you originally) for the purpose of promoting their organisation in the show guide/directory, whether through a free listing, or paid-for promotional opportunities if they so wish. It is in our legitimate business interest to use their personal information to perform our contractual obligations to you as your officially appointed supplier to produce the exhibitor/member publication(s). To this extent, our publishing agreements always require that you introduce PE to your exhibitors/members as the officially appointed media contractor before we make any contact.

How we will report opt-outs

In the very rare occasion that an exhibitor/member contacts us (rather than you, the CDO) with a request to opt-out of the agreed communications relating to the exhibition/association guide, we will send you a report (including the company name, contact name, telephone number, email address, stand number if applicable, company ID and the date and content of the request) within 2 working days of receiving the request. We will immediately place a hold on all communication with the company and wait for confirmation from you that the opt-out should be processed. If this is the case, we will delete all records of the company from our systems/databases. In most cases, however, it is likely that the company that has requested the opt-out will rescind that request once the CDO / PE explains the circumstances under which they have been contacted.

Where we store your customers' data

The data that we collect from your customers is stored within the EEA (European Economic Area). We take all of the steps that are mandatory or reasonably necessary to ensure that your data is treated securely and in accordance with our Privacy Policy and applicable data protection laws.

How we maintain security of your customers' personal information

We use appropriate administrative, technical and physical measures to safeguard personal information against loss, theft and unauthorised uses, access or modifications, including all measures required pursuant to Article 32 of the GDPR. Our online collection system, Klarents, is password protected and any payments made by exhibitors/members via Klarents are processed in a secure environment using software provided by WorldPay.

How we have engaged with our suppliers to ensure that they are similarly GDPR-compliant

Your customers' personal information would only be passed onto one of our approved suppliers for mailing purposes if this is part of our agreement with you. In the event, these suppliers are contractually bound only to use personal information to perform the services that we hire them to provide. We always review our supplier agreements and their data protection and security policies to ensure that any service providers we work with keep your customers' personal data secure.

How we have implemented processes and procedures to be able to comply with the data subjects' rights provided for in GDPR

We nominate specific individuals as the recipients of exhibitor/member lists. Once received, only qualified employees have access to your customers' information at any time and it is only accessed in a secure environment. Qualified users receive training on how this data may be used and how to report any opt-outs we might receive. On receipt of the lists, the data files are placed on a secure server, which has firewall and endpoint protection. Any software maintenance to machines is carried out by our approved and GDPR-compliant IT supplier and at no point is anyone else allowed access to the data servers.

How we detect, investigate and report data breaches in accordance with GDPR requirements

The security of all data (including personal information) that we hold is highly important to us. Not only do we implement data security measures to protect it, but we also have processes and procedures in place to ensure that, in the event of a breach, it will be detected, investigated and managed efficiently.

¹As part of your collection of exhibitor/member personal information for internal use and also for use by third parties, you may wish to review your agreements with your customers so that it is clear to them that you securely share their data with only officially-appointed third party and GDPR-compliant contractors for the provision of necessary services to them.

This may not be necessary as you have an existing relationship and valid consent with your exhibitors/members. Even if there isn't an explicit mention on your exhibitor or member contract/agreement, the relationship clearly exists with the exhibitor/member data we are processing under strict instructions from you, for the purposes of producing a show guide or membership directory that is part and parcel of their exhibitor/member package.

However, you may wish to consider including the following in your contracts:

'How [xyz organiser / association] uses your data

The company contact that you submit on this contract/order form will be our primary contact within your company/organisation for communications in relation to the exhibition/event (member services).

[xyz] will use the information that you provide for the purposes of (running the exhibition / event and informing you about associated services related to the exhibition/event) / (providing member services). For this purpose [xyz] may share information with third parties that are officially involved with (the exhibition/event) / (providing relevant member services), including the supplier / compiler for the (official event guide) / (official membership directory/yearbook). Any such third parties are contractually bound only to use personal information to perform the services that we hire them to provide.

If you have any questions about how we use your information, or if you would like to change your primary contact, please contact...'

C) Relevant excerpts from standard terms in Publishing Event's publishing agreements with clients (CDOs) concerning confidentiality and data protection

1. Updates on exhibitors/members

The contact lists will include the exhibitor/member organisation's contact details (including at least the name of a contact person, job title, email address, telephone number).

2. Minimum number of exhibitors/members

The guarantee by PE to publish the Event Guide / Membership Directory shall depend on [agreed number] of exhibitors/members being supplied by the Event Organiser / Trade Association from two months before the Agreed [Publication] Delivery Time whom a) the Event Organiser / Trade Association gives PE full contact details at the time, and b) who have given their permission to be contacted by telephone or email by a third party for the purposes of being featured or promoted in the Event Guide / Membership Directory.

3. Confidentiality and data protection

3.1. Each of the parties shall keep secret and confidential all information (written or oral) concerning the business and affairs of the other that it shall have obtained or received as a result of the discussions leading up to or entering into of this Agreement, including without limitation the terms of this Agreement. The obligations in this Clause shall:

3.1.1. be subject to the terms of this Agreement;

3.1.2. not prevent either party from disclosing any information of the other to the extent that it is necessary to do so in order to perform its obligations under this Agreement and in the case of PE, PE shall be entitled to pass relevant production material for the appropriate purpose to third parties such as printers and transport companies who are involved in producing and delivering the Event Guide / Membership Directory;

3.1.3. not extend to i) information which is in the public domain other than as a result of a breach of this Agreement by the other party or as a result of a breach by any other party who is under an obligation of confidentiality; ii) information which the owner of the confidential information authorises the other in writing to disclose; iii) any information required by law to be disclosed.

3.2. Data Protection Laws means the Data Protection Act 1998 or Regulation (EU) 2016/679 (depending on which is applicable at the relevant time), the Privacy and Electronic Communications (EC Directive) Regulations 2003, and the EU General Data Protection Regulation (GDPR) 2018 as amended or replaced from time to time.

3.3. To the extent that PE processes any Personal Data on behalf of the Event Organiser / Trade Association under or in connection with this Agreement in its capacity as a data processor (as defined under Data Protection Laws), PE warrants, represents and undertakes to:

3.3.1. process such Personal Data only on the written instructions of the Event Organiser / Trade Association;

3.3.2. process such Personal Data only as required for the performance of its obligations under this Agreement;

3.3.3. maintain appropriate technical and organisational security procedures and measures necessary or appropriate to preserve the security and confidentiality of such Personal Data and to protect any such Personal Data against unauthorised or unlawful Processing, accidental loss, destruction or damage as may reasonably be required or directed by the Event Organiser / Trade Association from time to time;

3.3.4. notify the Event Organiser / Trade Association within twenty four (24) hours if in connection with this Agreement it becomes aware of any breach of this Clause and/or any accidental or unauthorised access of such Personal Data;

3.3.5. not transfer or allow access to such Personal Data to or from any location outside the European Economic Area except with the Event Organiser / Trade Association's prior written consent;

3.3.6. ensure that any employees, agents and sub-contractors with access to Personal Data are bound by confidentiality obligations in respect of access, use or processing of such Personal Data; and

3.3.7. upon the Event Organiser / Trade Association's request, delete or return to the Event Organiser / Trade Association all Personal Data processed by PE on behalf of the Event Organiser / Trade Association, upon termination or expiry of this Agreement, and delete existing copies unless otherwise required under applicable laws.

3.3.8. In relation to such Personal Data, PE shall co-operate with the Event Organiser / Trade Association to the extent reasonably necessary to enable the Event Organiser / Trade Association to adequately discharge its responsibility as a data controller under Data Protection Laws (including, without limitation, assisting the Event Organiser / Trade Association: (a) with data subject requests under Data Protection Laws; (b) responding to any enquiry made, or investigation or assessment of Processing initiated by data protection authorities in respect of Personal Data; and (c) data protection impact assessments to the extent required under Data Protection Laws).

D) Data policy for clients' exhibitors/members

Publishing Events (PE) is a specialist contract publisher with over 20 years' experience of working with Event Organisers ('EOs') and Trade Associations ('TAs') to produce their media products, such as event guides, member directories and online lists of companies.

For the purpose of applicable data protection laws Publishing Events Ltd, 2nd Floor, Chapel House, 18 Hatton Place, London EC1N 8RU, is the Data Processor ('DP') and the EO/TA is the Client Data Owner/Controller ('CDO').

We are committed to protecting and respecting your personal information in accordance with applicable data protection laws, including the General Data Protection Regulation (the 'GDPR').

'Personal Information' means any information relating to an identified or identifiable natural person, an identifiable natural person being one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

We only use the data you provide to the EO/TA to perform services we are contracted to fulfil in producing the official show guide/membership directory (namely contacting you by telephone and email for purposes of providing current exhibitor/member information and offering PE's official products and services), which is an integral part of your exhibiting or member experience provided by you as an exhibiting or member customer.

Our Privacy Policy explains how we use the information provided to us by the CDO, how we protect that information, and your legal rights in relation to your information. We are committed to abiding by this Privacy Policy, as well as the requirements of applicable laws, in the operation of our business.

How we use your personal information

We may use your personal information to:	How do we use personal information for this purpose?	What is the legal basis for us processing your information in this way?	Data storage period
<p>Help you to complete your complimentary profile submission through our online collection platform, Klarents, and also through our production department.</p>	<p>We need to use your contact information (such as your first name, surname, email address, telephone number, your job title and the organisation you work for) to assist you with your profile submission through our online collection platform, Klarents, or to contact you to remind you to complete your complimentary entry.</p>	<p>The legal basis for processing this information is that we have a legitimate business interest to use your personal information to perform our contractual obligations to the EO/TA who have officially appointed us to produce the publication for their exhibitors/ members.</p>	<p>We review the data that we hold on exhibitors and members annually to ensure that it is still relevant and necessary. Data shall be kept for no longer than is necessary for the purposes for which it is being processed.</p>
<p>Contact you to tell you about services/promotions available to you within the official exhibition/ membership publication(s).</p>	<p>We need to use your personal information (such as your first name, surname, email address, telephone number, your job title and the organisation you work for) to contact you about services/promotions that you may be interested in.</p>	<p>The legal basis for processing this information is that we have a legitimate business interest to use your personal information to perform our contractual obligations to the EO/TA who have officially appointed us to produce the publication for their exhibitors/ members.</p>	<p>We review the data that we hold on exhibitors and members annually to ensure that it is still relevant and necessary. Data shall be kept for no longer than is necessary for the purposes for which it is being processed.</p>

<p>Help you to complete any paid-for bookings you make through our online collection platform, Klarents, or directly with our sales department – and to provide the relevant artwork.</p>	<p>We need to use your contact information (such as your first name, surname, email address, telephone number, your job title and the organisation you work for) to assist you with any bookings you make through our online collection platform, Klarents, or directly with our sales department, as well as to provide us with the relevant artwork to be included in the event/membership publication.</p>	<p>The legal basis for processing this information is that we have a legitimate business interest to use your personal information to perform our contractual obligations to the EO/TA who have officially appointed us to produce the publication for their exhibitors/ members.</p>	<p>We review the data that we hold on exhibitors and members annually to ensure that it is still relevant and necessary. Data shall be kept for no longer than is necessary for the purposes for which it is being processed.</p>
<p>Process your payments and protect against fraudulent transactions.</p>	<p>We may need to process your personal information (such as your first name, surname, email address, telephone number, your job title and the organisation you work for) in order to process your payments, for accounting purposes, and to keep your payments safe and secure and protect against fraudulent transactions.</p>	<p>We have a legitimate business interest to process personal information to process your payments, for accounting purposes, and to keep our customers' payments secure.</p>	<p>We review the data that we hold on exhibitors and members annually to ensure that it is still relevant and necessary. Data shall be kept for no longer than is necessary for the purposes for which it is being processed and for regulatory and/or standard accounting practices.</p>

Where we store your data

The data that we collect from you is stored within the EEA (European Economic Area). We take all of the steps that are mandatory or reasonably necessary to ensure that your data is treated securely and in accordance with our privacy policy and applicable data protection laws.

Security of personal information

We use appropriate administrative, technical, and physical measures to safeguard personal information against loss, theft and unauthorised uses, access or modifications. Our online collection system, Klarents, is password protected. Where we have given you (or where you have chosen) a password, you are responsible for keeping this password confidential. Any payments made via Klarents are processed in a secure environment using software provided by WorldPay.

Your rights

You have the following rights with respect to the personal information that we hold about you:

Your right to access the information we hold about you

You have the right to ask us whether or not we process your personal data and to request information on the purposes of data processing as well as confirmation on whether we use your personal information for these purposes only. You can request access to the information we hold about you by contacting us via klarents@publishingevents.com. We will endeavour to make our file of your information available to you within 1 month, although occasionally we may not be able to give you access to the personal information we hold about you (for example, we may not be able to give you access if it would unreasonably affect someone else's privacy or if giving you access poses a serious threat to someone's life, health or safety).

Your right to have your information corrected or deleted

If you would like us to delete your information, please contact the CDO (EO/TA) in the first instance, or we can pass on your request on your behalf.

Your right to object to us processing your data

You have the right to ask us to stop processing your data, even where that processing is necessary for our legitimate business interests (for example, where the processing is necessary for the legitimate fulfillment of our obligations to the CDO). You also have the right to object to any results of a processing activity that prejudice your rights and that are conducted exclusively through automated systems.

Your right to make a complaint

You have the right to lodge a complaint with the data protection authorities if you believe that we have not complied with applicable data protection laws. You also have a right to claim damages if processing of your personal information violates applicable data protection law.

E) PE's data map/flow

