



Applicant Privacy Statement

Introduction

Thank you for your interest in being a part of Shopper Media Group.

Shopper Media Group understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who sends us applications or CV's.

Please take a moment to read and understand this statement as we want to ensure that you are fully aware of your rights not only with SMG, but also with any other organisation you may send material to.

SMG will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

If you have any questions about the statement please contact us at the details below, and we will be happy to help you.

If you do not feel you can accept this statement, then please do not send us your information. If, however, you feel confident sending us your information we will take that as acceptance of this statement.



1. Information about us

We are Shopper Media Group; a limited company registered in England under company number 10366845.

Registered address:	22a Leathermarket street, London, SE1 3HP.
Data Protection Officer:	The Directors
Email address:	info@shoppermediagroup.com
Telephone number:	020 3553 5555

2. What does this statement cover?

This Privacy Statement applies only to your sending of employment information or applications relating to employment at SMG. Please note that we have no control over how your data is collected, stored, or used by other companies and we advise you to check the privacy policies of any such companies before providing any data to them.

3. What is personal data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

4. What are my rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Statement should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 12.
- b) The right to access the personal data we hold about you. Part 11 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 12 to find out more.

- d) The right to be forgotten, i.e., the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 12 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time. So if you send us a CV and then decide that you would rather we did not have it, you can request that we delete it.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 12.

It is important that your personal data is kept accurate and up to date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 12.

5. What data do you collect and how?

If you send us application data including CV's we will collate and use the data in the ways set out below and only in these ways.

Data Collected	How we Collect the Data
Application data	Sent by applicants for positions at SMG
CV data	CV's sent by prospective employees

6. How do you use my personal data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful bases for doing so:

What we do	What data we use	Lawful basis
In providing employment we will need applicants to submit certain personal data as part of the process	We use address, referee, employment history and education data to help us determine an applicant's suitability for a role.	We have legitimate interests that as an applicant applies for a post, we can ensure their suitability. Applicants consent to us having this data as they send it voluntarily.
CV and prospective employment information	CV's, employment history, contact details	The voluntary act of sending us an unsolicited CV for prospective employment signifies consent.

You will not be sent any unlawful marketing or spam, nor will we use this information for marketing of other business purposes beyond the stated goal of ensuring appropriate posts are filled.

We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out of any relationship with us..

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to

use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 12.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

7. How long will you keep my personal data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of data	How long we keep It
Applications for junior posts	We keep applications for 12 months from the point of receipt. This is in case a post comes available that may suit an applicant.
Applications for Senior posts	Normally held for 2 years.
Unsolicited CV's	Held for 12 months unless requested otherwise.

8. How and where do you store or transfer my personal data?

We will only store your data within the UK. This means that it will be fully protected under the Data Protection Legislation.

Please contact us using the details below in Part 12 for further information about the particular data protection mechanism[s].



The security of your personal data is essential to us and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where [we are] legally required to do so;

9. Do you share my personal data?

We will not share any of your personal data with any third parties for any purposes, subject to the following exception[s].

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Statement.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10. Can I withhold information?

If you wish us to destroy the data we hold on you please request this using the details in section 12.

11. How can I access my personal data?

If you want to know what personal data, we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 12.

To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.



There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 28 days and. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of [our] progress.

For your security we may require proof of identity, in this case we will contact you to request such proof. The 28-day time for our response to your request will then start from the point that we receive such proof.

12. How do I contact you?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details

Email address: info@shoppermediagroup.com

Telephone number: 020 3553 5555

Postal Address: 22a Leather market street, London, SE1 3HP.

Changes to this Privacy Statement

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on the SMG website and you will be deemed to have accepted the terms of the Privacy Statement on your first use of our site following the alterations. We recommend that you check this page regularly to keep up to date.

This Privacy Statement was last updated on 12/2/2020.