

CMS Data Protection & Privacy Policy

Concerning business activities connected with CMS - Communications and Management for Sustainability and Coastal Futures

Version 5th April 2018

1. Introduction

1.1. Author & Data Controller: Bob Earll bob.earll@coastms.co.uk

1.2. CMS – Communications & Management for Sustainability and Coastal Futures are *for profit* businesses run by Bob Earll.

1.3. This Data Protection Policy (DPP) has been prepared to demonstrate how we are meeting the requirements of the General Data Protection Regulations (GDPR) in our routine communications and practice with contacts and clients.

1.4. This policy covers the main activities we undertake in organising the services provided by CMS – Communications and Management for Sustainability and Coastal Futures conferences which cover three main areas of our work as follows:

- Bulk emailing to the CMS contact list
- Accounting and financial dealings with clients purchasing our services
- Routine, day to day office activities and archive office procedures, contacts and clients

These sections are described in more detail below.

1.5. Overall **policy** It has been and is our policy to conduct our activities in line with current data protection policies i.e. GDPR. Since we have to subscribe to a high standard of business accounting and the compliance standards imposed by credit card companies this approach extends to our financial transactions with business clients. It is our intention to make our DPP policy and process as transparent as possible.

1.6. Requirements of **GDPR: Contact and client (data subjects) rights** We will seek to respond to any inquiries about the new rights under the GDPR including:

- Your right of access to personal information records
- Your right to correct data
- Your right to be forgotten, for records to be deleted
- Your right to withdraw your consent for processing at any time
- Your (the) right to complain to the Information Commissioners Office

1.7. **Security breach** We will communicate with contacts or clients should we have a security breach.

2. Bulk emailing to the CMS contact list

2.1. **Introduction** CMS has been using its emailing contact lists for over 20 years to advertise jobs, conferences and a wide range of client activities and to mail weekly newsletters. Since 2008 it has been using MailChimp, a white listed emailing provider, to facilitate this. Since 2014 contacts have used the consent based *opt-in* system on our website to join our mailing list.

2.2. Mailing contents Contacts receive mailings on news, jobs, conferences, including for Coastal Futures its promotions and outputs, and a range adverts covering the work of business clients in the water and marine sector. The mailings are based on preferences selected by contacts.

2.3. Personal data held For routine mailings using the MailChimp emailing service we hold the name, email address and in some cases organisation details. Other details such as the date contacts subscribed (evidence of consent based opt-in), and mailing preferences are also held.

We do not hold postal address information for our email contacts.

It is our policy only to hold the personal data consistent with our current practice e.g. emailing.

2.4. CMS does not share or sell personal information about contacts or customers with third parties for the purposes of marketing.

2.5. Risk Assessment From our understanding of the GDPR regulations the data we hold with regard to our bulk emailing contacts would be a 'low risk' in relation to our contacts.

2.6. Consent based subscription and unsubscribing We process this data on the basis of consent. We have the details of when contacts subscribed to the CMS Emailing service and since 2014 we have and continue to use a consent based opt-in approach via our website <http://www.cmscoms.com/>.

We have no desire to send people unwanted emails. All emails carry an unsubscribe option or if you wish the data controller, Bob Earll - bob.earll@coastms.co.uk - will remove your details.

3. Accounting and financial dealings with clients

3.1. Introduction CMS is a business operated by Bob Earll as a sole trader. We maintain records of our financial transactions with clients (e.g. for adverts placed) or bookings made by credit card or cheque as would any business. In this regard these are subject to standard accounting procedures not least the need to retain transaction/account records for seven years.

We comply with the data protection standards of our credit card company which explicitly requires that credit card details are destroyed after transactions. This data is not used for any other purposes.

4. Routine, day to day office activities and archive office procedures

4.1. Introduction Our business activities fall into two main categories: routine and day to day contacts with clients and business associates, and archive records that arise from the completion of projects. In this regard we follow procedures that ensure a high level of security on our computing activities as well as offline storage of information in locked cabinets.

The data involved is not used for any other purposes.

5. Other Questions

Should you have any questions concerning our work and data protection issues please contact the data controller Bob Earll bob.earll@coastms and we will try our best to help you with these.