

Cherubs Magazine Privacy Notice

The purpose of this document

1. Cherubs Magazine is committed to protecting the privacy and security of your personal information.
2. This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).
3. It applies to readers and advertisers.

Cherubs Magazine is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to readers and advertisers. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

How is your personal information collected?

We collect personal information about subscribers, readers through the subscribe process. We may sometimes collect additional information from third parties including customers, suppliers and other referees or in order to perform other background checks throughout the application process.

How we use your personal data

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest [or for official purposes].

Cherubs Magazine uses the information collected from you to perform the contract we have entered into with you to provide you with the benefits of being a Cherubs Magazine member. Cherubs Magazine also acts on behalf of its clients in the capacity of data processor. When working exclusively as a data processor, Cherubs Magazine will be acting on the instruction of its client and will work hard to ensure that the client is fully GDPR compliant.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as providing a benefit or service) [or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).]

Change of purpose

We will only use your personal information 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 information 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 information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Some personal data may be collected about you from the forms and surveys you complete, from records of our correspondence and phone calls and details of your visits to our website, including but not limited to personally identifying information like Internet Protocol (IP) addresses. Cherubs Magazine will use such information to identify its visitors. Cherubs Magazine may also collect statistics about the behavior of visitors to its website.

Cherubs Magazine's website uses cookies, which is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. Our website uses cookies to help Cherubs Magazine identify and track visitors and their website access preferences. Cherubs Magazine website visitors who do not wish to have cookies placed on their

computers should set their browsers to refuse cookies before visiting Cherubs Magazine’s website. For more information on the cookies we use, please see our [cookie policy].

Any information Cherubs Magazine holds about you and your business encompasses all the details we hold about you and any transactions including any third-party information we have obtained about you from public sources and our own suppliers such as credit processing agencies, or references provided by you in the course of your application.

Cherubs Magazine will only collect the information needed so that it can provide you with business networking and referrals services.

Legal basis for processing any personal data

Legitimate interests pursued by Cherubs Magazine and/or its clients.

To promote the marketing and consulting services offered by Cherubs Magazine and/or to market the services and/or products offered by Cherubs Magazine existing clients.

Through agreeing to this privacy notice you are consenting to Cherubs Magazine processing your personal data for the purposes outlined. You can withdraw consent at any time by emailing info@cherubsmagazine.com or writing to us, see last section for full contact details.

Cherubs Magazine may on occasions pass your Personal Information to third parties exclusively to process work on its behalf. Cherubs Magazine requires these parties to agree to process this information based on our instructions and requirements consistent with this Privacy Notice and GDPR.

Consent

We do not need your consent to process your personal data in order to perform our contractual obligations to you. In limited circumstances, we may approach you for your written consent to allow us to process certain data or particularly sensitive data. If we do so, we will provide you with full details of the information that we would like it and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

Data sharing

We may have to share your data with third parties, including third-party service providers and other entities in the group.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU.

If we do, you can expect a similar degree of protection in respect of your personal information.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group. The following activities are carried out by third-party service providers: IT services, such as Cherubs Magazine [extended payment plans, and payment processing providers, market research, product fulfilment and data analytics]. The activities for which we use third-party service providers may change from time to time in order for us to meet the needs of the business.

How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

What about other third parties?

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

Retention Policy

Cherubs Magazine will process personal data during the duration of any contract and will continue to store only the personal data needed for [two years] after the contract has expired to meet any legal obligations. After two years any personal data not needed will be deleted.

Data storage

Data is held in UK using different (multiple) servers. Cherubs Magazine does not store personal data outside the EEA.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).

- **Object to processing** of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact Cherubs Magazine in writing by emailing info@cherubsmagazine.com.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such 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 the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Sevim in writing by emailing info@cherubsmagazine.com Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

The details for each of these contacts are:

Cherubs Magazine

Data Protection Regulator:

Information Commissioner's Office

Telephone 0303 123 1113 or complete a form at: <https://ico.org.uk/concerns/handling/>