

1. IMPORTANT INFORMATION AND WHO WE ARE

Reflect Agency Ltd (Company no. 13313762) is the controller and responsible for your personal data. Our registered address is at 16 Connaught Place, London W2 2ES.

We have appointed a data protection officer (DPO). If you have any questions about this privacy notice or our data protection practices please contact the DPO (see section 11).

2. WHAT DOES THIS POLICY COVER?

We are contracted by our clients to create media campaigns (including, but not limited to, magazines, social media and podcasts). As someone who may feature in one of our campaigns, we need to collect personal data about you for this to happen. This Privacy Notice explains how we use your personal data: how it is collected, how it is held, and how it is processed.

It also explains your rights under the law relating to it.

Terminology:

The “**Publication**” means the publication (for example, print/digital magazine or podcast) you will feature in.

The “**Campaign**” means the marketing or media campaign undertaken by Reflect on behalf of the client.

The “**Client**” means the relevant client of The River Group who has commissioned the Publication or Campaign.

3. 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 Notice 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 11.
- b. The right to access the personal data we hold about you. Part 10 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 11 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 have. Please contact us using the details in Part 11 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 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.
- h. Rights relating to automated decision-making and profiling. Part 6 explains more about how we use your personal data, including automated decision-making and profiling.

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 11.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

4. CONSENT

In the vast majority of cases we will gain your explicit written consent to use the personal data that you provide us. This will most likely be in the form of a signed Consent Form but can also include confirmation via email, social media or other electronic communication method.

In some cases, processing may be necessary for the purposes of the legitimate interests pursued by The River Group, except where such interests are overridden by your or fundamental rights as a data subject.

We may also use your data if passed to us by a 3rd party such as The Client or a recruiter, but only if the 3rd party has already gained your consent for us to use it in the particular capacity.

You may withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

5. WHAT PERSONAL DATA DO YOU COLLECT?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you, such as:

- Name;
- Gender
- Date of Birth
- Email address;
- Social media handles;
- Postal address;
- Photographs;
- Phone number;
- Video;
- Health, family and lifestyle information such as age, height, clothes size, weight and your job.

The above will vary according to your relationship with us and the subjects covered in the interview, media campaign or feature.

6. HOW DO YOU USE MY PERSONAL DATA?

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

- Where we need to perform the contract we are about to enter into or have entered into with you.
- 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.
- Where we need to comply with a legal obligation.

Your personal data may be used for one or more of the following purposes listed below. We will only use the minimum amount of your personal data needed to perform each task in line with your consent. In most cases this will just be sharing any personal data contained within the interview, media campaign or feature itself.

- Use in the Publication print and online magazines or podcasts.

- On websites related to the Publication, Campaign, The River Group or the Client.
- Social media channels in affiliation with the Publication, Campaign, The River Group or the Client.
- For use in internal communications within The Client company or The River Group. For example, print and digital posters, leaflets and internal email comms.
- Supplying our products or services to you. Your personal details are required in order for us to enter into a contract with you.

We will only use your personal data 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data 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 data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

7. HOW LONG WILL YOU KEEP MY PERSONAL DATA?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. Examples include archived copies of previous magazine issues or signed commissioning forms to prove your consent. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

8. HOW AND WHERE DO YOU STORE OR TRANSFER MY PERSONAL DATA?

Where practicable we will only store or transfer your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway,

Iceland, and Liechtenstein. When data is stored within the EEA, that means that your personal data will be fully protected under the Data Protection legislation.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection legislation. Please contact us using the details below in Part 11 for further information about the data protection mechanism used by us when transferring your personal data to a third country. We also take additional steps such as –

- Access to personal data is restricted to company employees for whom it is necessary to have such access.
- We ensure we have a record of exactly what personal data we are retaining and processing.
- To protect your personal information, we take reasonable precautions and follow industry best practices to make sure it is not inappropriately lost, misused, accessed, disclosed, altered or destroyed.

9. DO YOU SHARE MY PERSONAL DATA?

The River Group may sometimes contract with third parties to supply services for us. In some cases, those third parties may require access to some or all of your personal data that we hold.

- The Client: in order to fulfil part of our contract with them
- Social Media: Instagram, Facebook, YouTube, Pinterest, Twitter (accounts affiliated with the Client, The River Group, Campaign or the Publication).
- The Client's external marketing agencies.
- DigitalOcean: who host our website on servers in London
- Microsoft Office 365 Platform: our email service
- Google G Suite
- Zoho Sign: our electronic signature platform
- PocketMags and similar digital magazine or podcast platforms
- Website Analytics: Google Analytics uses cookies to collect non-identifying information on our website. Google provides some additional privacy options regarding its Analytics cookies at <http://www.google.com/policies/privacy/partners/>.

We will only share the minimum amount of your data needed to perform the task for which the 3rd-party is contracted for.

If any of your personal data is required by a third party, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 3.

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. HOW CAN I ACCESS MY PERSONAL DATA?

Under certain circumstances, you have rights under data protection laws in relation to your 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 commonly known as a "subject access request". All subject access requests should be made in writing and sent to the email address shown in Part 11.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

11. 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:

Full name of legal entity:

Data Protection Officer, Reflect Agency Ltd

Email address:

dpo@reflecttheagency.com

Postal address:

16 Connaught Place, London, W2 2ES

Telephone number:

+44 (0)207 420 7000.

12. CHANGES TO THIS PRIVACY NOTICE

We keep this Privacy Notice under regular review and may make changes to it 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 made available via our website www.reflecttheagency.com). This version was last updated in September 2021.