

The Malmesbury Jackdaw – Privacy Policy (GDPR)

Overview

We are a not-for-profit unincorporated association producing and distributing a quarterly community magazine, *The Malmesbury Jackdaw*, supported by a website, www.themalmesburyjackdaw.co.uk.

We process and control Personal Data.

This Privacy Policy describes the types of Personal Data we collect to allow us to effectively produce our magazine and run our website.

This policy also describes how we use Personal Data; whether or not we share it; your rights and how to contact us about our privacy practices.

This policy does not apply to third party websites, products, or services, even if they link to our magazine or website, and you should consider the privacy practices of those third parties carefully.

We will make reasonable endeavours to ensure that our advertisers, suppliers and distributors comply with the General Data Protection Regulation (GDPR).

How We Work

We do not have a Data Protection Officer. Responsibility for GDPR compliance is shared equally between the editor, finance manager and web design/IT manager.

The editor is the co-ordinator and main contact for GDPR issues. See “Contact Details” below.

We have a process which enables us to respond to breaches of GDPR within the prescribed timescales.

We have a process which enables us to respond to Data Subject Access Requests within the prescribed timescales.

We have a process which enables us to respond to erasure or correction requests.

GDPR compliance is a constant agenda item at our regular operations reviews.

All our documents containing Personal Data will be held on computer under password protection.

Any documents containing Personal Data received which must remain in paper form will be securely held.

Our website is for information only.

In order to produce our magazine and website, we collect and store data from the following:

1. Contributors

We assert the lawful basis of **legitimate interest** to process our contributors’ Personal Data.

This includes individuals, businesses and organizations who wish us to publish articles they have produced and own in our quarterly magazine. We require all submissions to be made by email and we will retain the following Personal Data in our records for a maximum of 2 years from the latest date of contact, unless the contributor requests earlier removal.

- Contributor's name (including pseudonyms if provided)
- Contributor's email address
- Postal address
- Telephone number
- Title and date of the contribution

We will use this information for the following purposes **only**:

- To request and receive submissions from a contributor
- To discuss amendments to any submission received from a contributor
- To answer any queries a contributor may pose
- To display the author's name in the published article

2. Advertisers

We assert the lawful bases of **contract and legitimate interest** to process our advertisers' Personal Data.

This includes individuals, businesses and organizations who advertise in our magazine. We will retain the following Personal Data for a maximum of 10 years from the latest date of contact, unless the advertiser requests earlier removal.

- Advertiser's name and postal address
- Advertiser's email address
- Advertiser's telephone number
- Advertiser's specific contact name
- Details of the nature of their business

We will use this information for the following purposes **only**:

- To request and receive advertisements
- To discuss any amendments to the advertisement with the advertiser
- To invoice the advertiser and follow up non-payment
- Completion and retention of sales ledger records

Additionally, we will seek and retain publicly available information about potential new advertisers to enable us to contact them to offer advertising space in our magazine. The information we collect will be:

- Advertiser's name and postal address
- Advertiser's email address
- Advertiser's telephone number
- Advertiser's specific contact name
- Details of the nature of their business

If a potential advertiser does not take advertising space in our magazine, we will retain their Personal Data for a maximum of 2 years from the latest date of contact, unless they request earlier removal.

3. Suppliers

We assert the lawful bases of **contract and legitimate interest** to process our suppliers' Personal Data.

This includes individuals, businesses and organizations who may supply services to our magazine. We will retain the following Personal Data for a maximum of 10 years after the service ceases, unless the supplier requests earlier removal.

- Supplier's name and postal address
- Supplier's email address
- Supplier's telephone number
- Supplier's bank account details
- Details of the nature of their business

We will use this information for the following purposes **only**:

- To request and receive services
- To discuss any changes to the service contract with the supplier
- To pay invoices received from the supplier
- Completion and retention of purchase ledger records

4. Distributors

We assert the lawful basis of **legitimate interest** to process our distributors' Personal Data.

This includes individuals, businesses and organizations who may distribute our magazine. We will retain the following Personal Data for a maximum of 3 years for private individuals and 10 years for businesses from the latest date of contact, unless the distributor requests earlier removal.

- Distributor's name and postal address
- Distributor's email address
- Distributor's telephone number

We will use this information for the following purposes **only**:

- To arrange, organize and maintain the quarterly distribution of the magazine
- To discuss any changes to distribution requirements with the distributor
- To fulfil our duty of care towards the distributor
- Completion and retention of purchase ledger records

5. Subscribers

We assert the lawful basis of **contract and legitimate interest** to process our subscribers' Personal Data.

We will retain the following Personal Data for a maximum of 3 years for private individuals from the latest date of contact, unless the distributor requests earlier removal.

- Distributor's name and postal address
- Distributor's email address
- Distributor's telephone number

We will use this information for the following purposes **only**:

- To forward postal copies of the magazine
- To request and follow up payment
- To reply to requests from the subscriber
- Completion and retention of sales ledger records

Minors

We do not accept submissions direct from minors, so we ask that they make their submissions through an appropriate adult, e.g. parent, guardian or teacher. We will not hold Personal Data which we identify as relating to a minor in our records, other than that held in archived copies of the magazine.

Sensitive Personal Data

Should we need to process any Personal Data designated as “sensitive” under GDPR we will obtain specific consent from the subject prior to processing.

Disclosure of Information to Third Parties

We do not sell, rent or share Personal Data with marketers or any other third parties, subject to the following.

We will only share Personal Data if we believe it necessary to:

- comply with applicable law, or payment method rules;
- enforce our contractual rights;
- protect the rights, privacy, safety and property of *The Malmesbury Jackdaw*, you or others;
- respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities;

Your Rights

You have the following rights:

- To request confirmation of whether *The Malmesbury Jackdaw* processes Personal Data relating to you, and if so, to request a copy of that Personal Data;
- To request that *The Malmesbury Jackdaw* corrects or updates your Personal Data;
- To request that *The Malmesbury Jackdaw* erases your Personal Data from its records;
- To request that *The Malmesbury Jackdaw* restricts the use of your Personal Data;
- To object to the processing of your Personal Data at any time;
- To request your Personal Data so that you can send it to another third party or to request us to do so on your behalf.

Contact Details

For all Privacy Policy enquiries please email editortmj3@gmail.com