



GDPR, IML and You

The General Data Protection Regulation, GDPR for short, will become UK law with effect from May 25th through the Data Protection Act 2018.

The essential change the new law makes is to give you more control over the data we hold about you.

As providers of information to help employees in industry and commerce in their daily jobs, we have only ever collected your name, job title and work address, plus details about the company for whom you work.

That's all we need to deliver the business information our print magazines, electronic media and events have been bringing to successive generations of workers in industrial and commercial businesses, for forty years.

Under the latest legislation, you will have the right to see what personal information we hold about you. How we collect it and use it, and the right not to be included in the readership of any of our products, if that is what you want. To be "forgotten" as the new legislation terms it.

The greater transparency, enhanced rights and increased accountability that GDPR affords each of us, is welcomed by IML. We understand the importance of maintaining the confidentiality of any information you may provide while using our websites, our publications and attending our events, and we remain committed to your to privacy.

Our updated privacy policy expands upon how we will continue to protect the confidentiality of any information you may have provided. We want you to easily understand your rights and our obligations towards you and the data we hold about you, and be clear about your ultimate sanction – to stop us using your data.

So let's start with a few definitions.

Personal Data – What it is and why we hold it.

It is your name, the job title or job function associated with your employment; the address at which you work and the name of the company that employs you. We hold no personal details beyond this unless you have provided your home address as an alternative delivery point for our information, or a personal telephone number or email address. We may hold data regarding your interests and influences at work if you have given us that detail.

Drawn from the public domain, we have a register of companies operating in the UK. This contains details of the industries in which they operate and the products and services offered to their markets and this can be linked to your Personal Data.

This is the information we use to deliver business intelligence to readers of our publications, users of our web sites and digital media, and attendees to our events.

The Data Subject – who is it?

It's any person who provides Personal Data directly, or who finds themselves in receipt of material perhaps personally requested, or possibly as a result of shared use, or through non personalised distribution. The Data Subject has the right to know what information is held, how it is being used and by whom, and to end their inclusion on such lists.

Data Controller – what it is and what it does.

It's the entity responsible for the collection, maintenance, security and use of Personal Data. Its obligations include the maintenance of privacy and security of Personal Data; to provide the Data Subject with access to the information on file; to meet the requests of the Data Subject in relation to its personal record. This may ultimately include a restriction of use, or the removal of that data.

The Right to be Forgotten

Perhaps GDPR's strongest element, it confirms in law, the right of the individual to stop the inclusion of their Personal Data in any distribution list, where there is not a legal requirement for such inclusion.

Legitimate Interest

This is the most flexible lawful basis for data processing. It is most appropriate where personal data is used in a way data subjects would reasonably expect, and which has a minimal privacy impact upon them. Legitimate Interests can be those of the Data Controller or third parties, or the Data Subject itself. It can embrace commercial interests but the processing must be that necessary to achieve the end result, whilst taking account of the individual's interests and rights of privacy.

Our Privacy Policy

Who we are.

IML Group Limited provides business intelligence and information, technology transfer, product information, case studies and how to detail, through a range of magazines, newsletters, websites and events. Our media is spread across a wide range of industries and commerce in the UK, EMEA and APAC regions. This information is provided free of charge in exchange for personal data from the reader that shows a match to the reader profile of our targeted distribution for each product.

We, as the data controller in respect of all personal data we hold, are required to provide you with specific information about how we will use, hold and retain this data, as well as making you aware of various rights that you have under this legislation.

We have set out this information below.

Under GDPR we are required to tell you the identity of the legal person who controls your personal data. IML Group Limited (Company Registration Number 2416272) is the data controller responsible for your personal data collected through our websites, by post, telephone research and event registration. IML's registered office is at Blair House, 184-186 High Street, Tonbridge, Kent, TN9 1BQ. Should you ever have any queries about what we hold, or how we process your personal data, your first contact should be our Data Protection Officer Mandie Hales, by post at our Tonbridge address, or email: DataProtection@IMLGroup.co.uk; or by phone: +44 1732 359990.

Mandie's division looks after the distribution data for each and every IML product and full list of our publications can be found [here](#).

Why we process your personal data?

We process your personal data for the following purposes:

- the distribution of monthly postal & digital magazines and weekly email newsletters of titles that serve your industry and job function ("Publishing Services"); and
- to provide you with marketing information, updates and publications relating to the services we offer and other related information ("Marketing Services").

The legal basis on which we process your personal data

Our processing is based on Legitimate Interest.

Clearly it is necessary for us to process your personal data in order to deliver the free business intelligence that our Publishing Services provide and that you or your company representative has requested. We will only use your personal data to

provide you with marketing information, promotions and information about issues that we feel match your likely interests and responsibilities or where you have given us your specific consent.

We may also need to process your personal data in order to comply with legal obligations to which we are subject.

Opting out of Publishing Services

You can ask us to stop sending you our publishing services at any time by following the opt-out links on any digital communication sent to you or by [contacting us](#) at any time.

Opting out of Marketing Services

You can ask us to stop sending you marketing intelligence at any time by following the opt-out links on any marketing message sent to you or by [contacting us](#) at any time.

Where you opt out of receiving marketing messages, you may not be able to access certain features of our Publishing Services.

Right to be Forgotten

Where you wish to exercise your right to be forgotten, please do so by contacting our Data Protection Officer at GDPRForgetMe@IMLGroup.co.uk. We will remove all personal data relating to you within the regulation's statutory 30 day period.

Please bear in mind that some communication may still be received during this window, especially in the case of postal publications which may be in the process of being mailed to you as your request is submitted.

Is it a legal (statutory or contractual) requirement for you to provide us with your personal data?

If you chose not to provide certain information when requested, we may not be able to perform any contract we have entered into with you or we may be prevented from complying with our legal obligations. For example, not providing us with your company email address or company mailing address will mean we are unable to send you the email newsletters or monthly magazines that you are requesting.

Who might we share your personal data with?

We may pass personal data to our third party service providers and other associated organisations for the purposes providing our services to you. When we use third party providers, we disclose only the personal information that is necessary to deliver that service. We have a contract in place that requires them to keep your personal data secure and in accordance with the requirements of UK data protection law and never to use it for their own purposes.

Third parties we use are as follows:

- Payment Processors. A transaction ID and monetary amount may be passed to a payment provider service when Event tickets and the like are purchased but no personal information is shared.
- We may share your personal data with mailing partners for the labelling and mailing of publications, supplements and direct mail process of providing our service to you.
- We may share your personal data with a third-party auditing organisation currently ABC -Audit Bureau of Circulations Ltd so they can verify statistics about circulation product usage or to review our procedures for compliance with relevant standards. You can view their privacy policy by following this link www.abc.org.uk/privacy-policy
- We may share your personal data with Advertising partners where you have given consent for us to do so e.g. when you use our sites' Reader Request Service or submit contact details to receive an Advertiser's Whitepaper.
- We may transfer your personal information to a third party as otherwise permitted by UK data protection law, for example to our legal advisors or in order to comply with a legal requirement or obligation placed on us by law.

Other than as referred to above, IML will never sell or share personal information with third parties.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Do we pass your personal data outside of the European Union?

Some of our external third parties may be based outside the European Economic Area ("EEA") so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).

- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

How long do we keep your personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes for which it was collected, including for satisfaction of any legal, accounting, or reporting requirements.

What are your data protection rights?

As a “data subject” under GDPR you have a set of specific rights and we are required to make you aware of the existence of these rights. They are in outline:

- the right to request from us, as the data controller, access to your personal data;
- the right to request rectification of your personal data;
- the right to request erasure of your personal data;
- the right to request a restriction on the processing of your personal data;
- the right to object to the processing of your personal data; and
- the right to data portability.

For further details on these rights, when they apply, how to exercise them and the exemptions and wider rules that apply to such rights, please visit the Information Commissioner’s website at www.ico.org.uk.

Your right to withdraw consent where processing is based on consent

Where any part of our processing of your personal data is based on your consent you may withdraw your consent to that processing at any time.

Your right to complain to the Information Commissioner’s Office

If you are unhappy with how IML is using your personal data we would encourage you to raise this concern with our Data Protection Officer at DataProtection@IMLGroup.co.uk.

You have the right to lodge a complaint about our compliance with the UK data protection legislation with the applicable regulator for data protection. This is the Information Commissioner’s Office. For more information you can visit their website at www.ico.gov.uk

Use of automated decision making or profiling

We do not carry out automated decision making or profiling.

The data we collect about you and how we collect it

General information

In general, we gather information about all of our users collectively, such as what areas of our websites are visited most frequently and which of our services are accessed the most. We only use such data in an aggregate form. This information helps us determine what is most beneficial for our users, and how we can continually develop a better overall experience for you.

User records

Each request to receive a publication or newsletter creates a reader record for that user. Personal data to generate an account is collected when a user registers for our services on one of IML's website subscription pages, via postal registration and via telephone registration. The personal data processed in these instances are:

- Salutation
- Name
- Company job title
- Company address
- Company telephone number
- Company email address.

IML aims to keep this information up to date through regular email and telephone renewal activity, as well as encouraging readers to inform us of any changes whenever they occur. We will continue to provide our services to you until we are informed of changes, either by yourself or your employer which result in you no longer requiring them.

Cookies

IML may use cookies to help personalise and enhance your experience when visiting our websites. A cookie is a text file that is placed on your computer by a Web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Our cookies can only be read by our web server.

IML uses its cookies for internal research and to give a better understanding of our audience such as conducting grouped statistical analyses of user traffic. IML does not use its cookies to store personal information about you.

Third party advertisers may serve cookies via this website but these are only used to serve advertisements from the website's ad servers and to track whether these advertisements are clicked on by visitors to the website.

Most browsers accept cookies automatically but you have the ability to accept/decline cookies by altering the settings in your browser. If you decline/disable cookies, you may not be able to use all the interactive features of the website or the website may not be available to you. For more information regarding the use of cookies go to www.aboutcookies.org.

Security

Our websites are protected against unauthorised access using the latest security devices and firewalls. We have put in place other appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Third party-links

Our websites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit. You should also be aware that if you link out to third party websites, they have their own privacy policies for which IML can accept no responsibility. Please be certain to check other sites before use.

Changes to the privacy policy

We reserve the right to add to or change the terms of this privacy policy in our sole discretion, without prior notice to you. If we change this privacy policy, we will post the new privacy policy on the website, and it will become effective from the time of posting to the website. Please visit this privacy policy on a regular basis to make sure you have read the latest version and you understand what we do with your information. This version was last updated on 25th September 2018.

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

