

Data protection policy

Our data protection policy sets out our commitment to protecting personal data and how we implement that commitment with regards to the collection and use of personal data.

We are committed to:

1. meeting our legal obligations as laid down by the General Data Protection Regulation (GDPR) (EU) 2016/679
2. ensuring that data is collected, processed and used fairly and lawfully
3. processing personal data only in order to meet our operational needs or fulfil legal requirements
4. taking steps to ensure that personal data is up to date and accurate
5. establishing appropriate retention periods for personal data
6. ensuring that data subjects' rights can be appropriately exercised
7. providing adequate security measures to protect personal data
8. ensuring that a nominated officer is responsible for data protection compliance and provides a point of contact for all data protection issues
9. ensuring that all staff are made aware of good practice in data protection
10. providing adequate training for all staff responsible for personal data
11. ensuring that queries about data protection, internal and external to the organisation, is dealt with effectively and promptly
12. regularly reviewing data protection procedures and guidelines within the organisation.
13. Lawfully acquired personal data shall be categorised into the following groups :

- a. **Presumed consent:** where we are contacting a client or customer out of necessity in relation to the reasons they gave their data, this contact may happen unless they withdraw their consent.

Opted in data: where a client or customer has specifically given their consent to be contacted. This contact may proceed.

Request to delete data: If we are working on behalf of a client we will notify the client of your request and they will action it in accordance with their own data policies. If we are working on our own behalf please email your request to gdpr@bdm-group.co.uk and we will action the request and email you back confirmation of the completion of the action. Where you request us to delete your data we will also pass your request back to the originator of the data if we purchased the data originally.

Opted out data: If you have advised us that you wish to opt out we will not contact you if you have instructed us not to do so. If you choose to option this route you will not be notified of new offers, product updates or recalls.

14. We only hold data where we can trace the origins and pass back to the source requests that the data is to be deleted.

15. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
16. Personal data shall be accurate and, where necessary and possible be kept up to date.
17. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.
18. We will not sell your data or pass onto third party operations for their own commercial or academic use.

BDM Group data policy