



<b>Company Name:</b>	Bright Media
<b>Company Contact details:</b>	BF12 The Terrace Grantham Street Lincoln LN2 1BD
<b>Document DP5A</b>	<b>Privacy Notice</b>
<b>Model Policy No;</b>	BMPN001v1.0
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<b>Version:</b>	1

Bright Media is an independent IT reseller and complete office solutions company with offices based in London and Lincoln, they provide their services to businesses and individuals throughout the UK. The company have their own team and must process personal data so that they can provide their services and pay their employees – in doing so, the Company acts as a ‘data controller’.

You may give your personal details to Bright Media directly, such as on an application, email, via a telephone call, at a client meeting or via their website. The Company must have a legal basis for processing your personal data. For the purposes of providing our services we will only use your personal data in accordance with the terms of the following statement.

### 1. What data do we collect?

We do not receive personal data about you other than what you directly provide to us.

**Personal data collected for employees paid by Bright Media, either permanent or flexible workers includes;**

- Name
- Address
- Telephone Number/Email Address
- National Insurance Number
- Date of Birth
- P45
- Bank Details
- Emergency Contact Information
- References (2)

We do not collect any sensitive personal data and should we need to, where appropriate we will seek clear, unambiguous consent which is separate from other terms and conditions.



## 2. Why do we collect your data?

### Purpose of processing and legal basis

The Company will collect your personal data and will process your personal data for the purposes of providing you with our services. The legal bases we rely upon to offer these services to you are:

- Consent
- Legitimate interest
- Legal obligation
- Contractual obligation

### Consent

We use consent to process sensitive personal data in relation to employees and will also gain consent at an initial, or subsequent meeting for clients.

Consent must be freely given, specific, informed and unambiguous, it will also be separate to other terms and conditions.

### Legitimate interest

Where the Company has relied on a legitimate interest to process your personal data our legitimate interests are as follows:

- To provide you with our advertising services.
- To ensure that employees of Bright Media receive payment for their work.
- To ensure that we have the appropriate information for HMRC and Pension purposes.

In order to process your personal data under legitimate interests;

- We have checked that the processing is necessary and there is no less intrusive way to achieve the same result.
- We have done a balancing test and are confident that the individual's interests do not override those legitimate interests.
- We only use individuals' data in ways they would reasonably expect, unless we have a very good reason.

Bright Media may process sensitive personal data in relation to health of paid workers. Legitimate interest will not be used to process this information.



## Legal Obligation

Where the company relies on a legal obligation to process your personal data, it is processing as this is necessary to comply with the law.

Examples of this are where employee information is needed by a regulatory or government body, such as HMRC, or information from accident records require processing for health and safety compliance.

## Contractual Obligation

Under contractual obligation processing is necessary due to the fulfilment of a contract.

The company relies on this lawful basis to process personal data to fulfil their contractual obligations to you, or because they have been asked to provide a pre-contractual quote.

### 3. Who do we share your data with?

#### a. Recipient/s of Data

The Company may need to process your personal data with the following recipients:

- Third-party companies – for the purpose of fulfilling your order.  
'Stationery Distributor' for orders placed online only.  
'Limited Suppliers' for direct deliveries or emailing software which is delivered directly to the client.
- Our Accounts Department - to authorise and complete payment transactions.
- Our IT provider – to support our IT function
- Our business management software – that supports us in running our business.

#### b. Statutory/Contractual Requirement

Your personal data is required by law, it is a contractual requirement and a requirement necessary to enter into a contract. You are obliged to provide the personal data and if you do not the consequences of failure to provide the data are:

- that we are unable to provide our work seeking, or business solutions support services.
- We are unable to employ you as a permanent, or flexible member of Bright Media.



#### **4. Data Retention**

The Company will retain your personal data only for as long as is necessary. Different laws require us to keep different data for different periods of time.

We must also keep your payroll records, holiday pay, sick pay and pensions auto-enrolment records for as long as is legally required by HMRC and associated national minimum wage, social security and tax legislation.

Where the Company has obtained your consent to process your personal data, we will do so in line with our retention policy (a copy of which can be requested by contacting us directly on 01522 785660/0207 2243363.

#### **5. Your Rights**

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data the Company processes on you;
- The right of access to the personal data the Company processes on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- The right to data portability in certain circumstances;
- The right to object to the processing of your personal data that was based on a public or legitimate interest;
- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent at any time.

Where you have consented to the Company processing your personal data you have the right to withdraw that consent at any time by contacting the company directors: Deborah Rossington or Rebecca Humphreys Elvis, Bright Media, 01522 785660/0207 2243363

#### **6. Complaints or Queries**

If you wish to complain about this privacy notice or any of the procedures set out in it please contact the company directors:

Deborah Rossington or Rebecca Humphreys Elvis, Bright Media, 01522 785660/0207 2243363

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.