

## **STV COMMERCIAL PRIVACY NOTICE**

Welcome to STV Commercial's products and services. STV Commercial is a trading style of STV Central Limited, a company registered in Scotland (company number SC172149), with registered office at Pacific Quay, Glasgow, G51 1PQ. STV Central Limited is the data controller responsible for looking after your personal data in line with data protection and privacy laws. This is STV Commercial's Privacy Notice.

We are committed to ensuring your privacy and protecting the data we hold about you. This Privacy Notice explains how we do this and describes how and when STV Commercial collects and processes your personal data.

Please note that we update our Privacy Notice from time to time, so please take a fresh read through every so often. If we make significant changes, we will make that clear on our micro site, or by some other means of contact such as email.

This Privacy Notice was last updated on 8 July 2019.

### **1. WHAT DATA IS COLLECTED AND WHEN?**

The type of information that may be collected will vary depending on the means by which we collect it and includes:

**Contact Data:** Any personal data you provide to us if you sign up for updates on our website or if you get in touch via email, phone or post with any comments or questions. This personal data will include things like your name, address, email address, telephone number and job title and the name of the organisation that you work for.

**Data from Other Sources:** We collect contact data from other sources such as corporate websites, publicly available information, and information made available to us by aggregators like ALF Insights ([www.alfinsights.com](http://www.alfinsights.com)).

You may ask us to amend your details by e-mailing us directly at [strategicdevelopment@stv.tv](mailto:strategicdevelopment@stv.tv). We will then process your request as soon as reasonably practicable.

### **2. COOKIES**

Our website uses cookies to operate and ensure the performance of our website. On this website we use embedded content from another organisation's website at [vimeo.com](http://vimeo.com). Accordingly, cookies used by vimeo will be used when you visit our website. The cookies used are necessary for our services to operate properly. They are known as "Strictly Necessary" cookies and without them our website will not work as we intend it to. They are required to enable you to move around our website and to enjoy its features.

### **3. HOW AND WHY WE COLLECT DATA**

Data protection and privacy laws permit us to collect and use your personal data on a limited number of grounds. The key grounds upon which we rely are one or more of the following:

- Where we need it to **fulfil a contract** we have with you.
- Where it is necessary for our **legitimate interests** and your interests and fundamental rights do not override those interests (please see below for more info).

**What do we mean by “Legitimate Interest”?** In certain situations, we collect and use your personal data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business profitably and efficiently and which does not materially impact your rights, freedoms or interests.

- Where we have your **consent**.

The only circumstance in which we rely on consent as our basis for processing your personal data relates to your preferences in receiving marketing from STV Commercial. As we explain later, if you are a business to business contact of ours we may determine that sending you marketing emails is within our legitimate interests to raise awareness of STV Commercial, promote our initiatives and to seek corporate engagement.

- In order to comply with a **legal or regulatory obligation**.

In the table below we have set out a summary of when we may process your personal data and our legal bases for doing so. Note that we may rely on more than one basis:

| Purpose/Activity   | Type of data used                                  | Basis for processing  |
|--|--|---|
| <p>To manage our relationship with you which will include:</p> <p>sending you service messages such as notifying you about material changes to our terms of use and/or privacy policy; and</p> <p>responding to any of your comments, complaint or queries</p> | Contact Data                                       | <p><b>Legitimate interests</b></p> <p>to ensure a great user experience of our services</p> <p>to comply with a legal obligation.</p> |
| <p>To hold corporate events and to network with organisations to find out how STV Commercial can help them grow their business using advertising on STV’s platforms.</p>   | <p>Contact Data</p> <p>Data from Other Sources</p> | <p><b>Legitimate interests</b></p> <p>for networking and the growth of STV Commercial’s business and for PR purposes.</p>             |
| <p>To keep in touch with established customers and to contact you as a potential customer to establish new corporate relationships.</p>  | <p>Contact Data</p> <p>Data from Other Sources</p> | <p><b>Legitimate interests</b></p> <p>for networking and pitching inventory to support the growth of STV Commercial’s business.</p>   |

|   |   |  |
|---|---|--|
| To sell STV Commercial advertising and sponsorship inventory          | Contact Data<br>Data from Other Sources<br>Marketing Data | <b>Legitimate interests</b><br>to operate STV Commercial's business in an efficient and profitable manner. |
| To process and administer payments made to us.                        | Contact Data  | <b>Performance of our contract with you.</b>   |
| Sharing of data with data processing companies who act on our behalf. | Contact Data<br>Marketing Data<br>Data from Other Sources | <b>Legitimate interests</b> to help manage your data and perform certain functions like sending emails.    |

#### 4. SHARING OF PERSONAL DATA

We share your data in the following circumstances:

- We share your data with the STV Appeal, a Scottish charitable Incorporated Organisation, when looking to develop initiatives and events.
- When we engage data processing companies to act on our behalf from time to time to help manage your data and to deliver specific functionality like dotdigital, who assist us in sending emails.
- Where we are required or permitted to do so by law or to protect or enforce our rights or the rights of any third party or our users.

We require all of these organisations to respect the security of your personal data and to treat it in accordance with the law and our strict instructions. We do not allow such third parties to further use or share your personal data. We also require them to have appropriate technical and operational security measures in place.

#### Transfers of Data Out of the EEA

Whenever we transfer your personal data out of the EEA to certain authorised suppliers providing functionality or other services to us, 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.
- 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.
- 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.

Please contact us at by email at [enquiries@stv.tv](mailto:enquiries@stv.tv) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## 5. MARKETING

We will send you marketing emails where you are a business to business contact of ours and where sending you marketing emails is within our legitimate interests to raise awareness of STV Commercial, promote our initiatives and to seek corporate engagement. We will also send you marketing emails where you have given consent for us to do so.

We will send you marketing information about events, competitions, initiatives or offers where you have signed up, on our website, for updates. Other marketing communications will be prompted by specific events, campaigns or initiatives we undertake.

We will contact you by phone unless you unsubscribe via the Corporate Telephone Preference Service (CTPS or TPS if you are an individual).

You can unsubscribe at any time via the unsubscribe link at the foot of any email, or contact us at [strategicdevelopment@stv](mailto:strategicdevelopment@stv).

We do not sell your personal data to any other organisation. We do not pass your personal data to any other organisation for any other purpose than as set out in this Privacy Notice.

## 6. LINKS TO OTHER SITES

To inform and enhance your experience when on website, we provide a number of links to other organisations' websites who apply their own privacy notices. Please note that this Privacy Notice will not apply to any such website. We do not control, or have any responsibility for, them.

## 8. YOUR RIGHTS

You have the right to:

- **Request access** to a copy of the personal data we hold about you (commonly known as a "data subject access request").
- **Request correction** of any inaccurate personal data that we hold about you.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it.
- **Object to processing** of your personal data where we are relying on a legitimate interest. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d)

you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- **Withdraw consent** to our sending you marketing emails where we base email marketing on consent.
- **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](http://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.

If you wish to exercise any of the rights set out above, please *Contact us* in writing. Contact details can be found below.

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.

## 9. DATA RETENTION

We will only retain your personal data for as long as you are happy to receive contact from us or for so long as is necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements. If you object or withdraw consent we will retain your email address on suppression for a year and then delete it. We will review the data we hold with you annually. We will maintain financial records for a period of 7 years.

## 10. CONTACT DETAILS

If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact our Data Governance Manager at STV Central Limited, Pacific Quay, Glasgow G51 1PQ or by email at [enquiries@stv.tv](mailto:enquiries@stv.tv).

**Updated: 8 July 2019**