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1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

2. Responsibilities

- 2.1 The Data Protection Officer is responsible for ensuring that this notice is made available to data subjects prior to Opus Trust Marketing Ltd. collecting/processing their personal data.
- 2.2 All Employees of Opus Trust Marketing Ltd. who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

3. Privacy notice

3.1 **Who are we?**

Opus Trust Marketing Ltd. is a leading specialist in the creation and delivery of secure, personalised communications to customers and employees across a range of industries. From physical correspondence to e-delivery, we send almost 1000 communications on behalf of our customers every minute. We provide innovative, timely and flexible solutions that drive engagement including interactive text, voice and video solutions; plus payslips, transactional documents and critical correspondence.

Our Data Protection Officer and data protection representatives can be contacted directly here:

- dataprotectionofficer@opustrust.co.uk
- 0116 232 7500



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The personal data we would like to collect from/process on you is:

Personal data type:	Source (where Opus Trust Marketing Ltd.
	obtained the personal data from if it has not been
	collected directly from you, the data subject. Note
	if the personal data has been accessed from
	publicly accessible sources):
Email address	LinkedIn
Name	News articles
Job role	Google searches
Contact telephone number	List brokers
Company name	Referral from colleagues or peers
Company address	Publicly available sources

The personal data we collect may be used for the following purposes:

- Staff magazine
- Press and social media coverage
- Events and exhibitions
- Sales brochures
- Presentations
- Website content
- Videos
- Company newsletter

Our legal basis for processing for the personal data:

- Consent
- Legitimate interest for sales and marketing purposes
- · To meet the requirements to fulfil a contract
- The personal data has been made public by the data subject

3.2 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Opus Trust Marketing Ltd. to process personal data, but it must be explicitly given.

You may withdraw consent at any time by contacting the Opus Trust Marketing Data Protection Officer <u>dataprotectionofficer@opustrust.co.uk</u> in line with Withdrawal of Consent Procedure.

3.3 **Disclosure**

Opus Trust Marketing Ltd. will not pass on your personal data to third parties, except for the purposes of communication transmission:

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Third country (non-EU)/international organisation

Survey Monkey (USA)

Mail Chimp (USA)

3.4 Retention period

Opus Trust Marketing Ltd. will process personal data and will store the personal data for a minimum of 12 and a maximum of 24 months for sales and marketing purposes.

3.5 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access you have the right to request a copy of the information that we hold about you.
- Right of rectification you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing where certain conditions apply to have a right to restrict the processing.
- Right of portability you have the right to have the data we hold about you transferred to another organisation.
- Right to object you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Opus Trust Marketing Ltd. refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.3 above) in the processing of your personal data.

3.6 **Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by Opus Trust Marketing Ltd. (or third parties as described in 3.3 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Opus Trust Marketing Ltd.'s data protection representatives Data Protection Officer / GDPR Owner.

The details for each of these contacts are:

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	Supervisory authority contacts details	Data Protection Officer (DPO) contact details
Contact Name:	Information Commissioners Office (ICO)	Vanessa Peel
Address line 1:	Wycliffe House	Opus Trust Marketing Limited
Address line 2:	Water Lane	133-137 Scudamore Road
Address line 3:	Wilmslow	Leicester
Address line 4:	Cheshire, SK9 5AF	LE3 1UQ
Email:	casework@ico.org.uk	dataprotectionofficer@opustrust.co.uk
Telephone:	01625 545 745	0116 232 7500

3.7 **Privacy statement**

Read more about how and why we use your data here http://www.opustrust.co.uk/company/privacy-policy

4. Online privacy statement

Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

How we use your information

This privacy notice tells you how we, Opus Trust Marketing Ltd. will collect and use your personal data to monitor website performance and manage service provision and communication with you.

Why does Opus Trust Marketing Ltd. need to collect and store personal data? In order for us to provide you with a service we need to collect personal data for correspondence purposes and any detailed service provision. In any event, we are

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committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

In terms of being contacted for sales and marketing purposes Opus Trust Marketing Ltd. would contact you for additional consent.

Will Opus Trust Marketing Ltd. share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to Opus Trust Marketing Ltd. in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with Opus Trust Marketing Ltd.'s procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

How will Opus Trust Marketing Ltd. use the personal data it collects about me? Opus Trust Marketing Ltd. will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Opus Trust Marketing Ltd. is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

<u>Under what circumstances will Opus Trust Marketing Ltd. contact me?</u>
Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

<u>Can I find out the personal data that the organisation holds about me?</u>
Opus Trust Marketing Ltd. at your request, can confirm what information we hold about you and how it is processed. If Opus Trust Marketing Ltd. does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Opus Trust Marketing Ltd. or a third party, information about those interests.
- The categories of personal data collected, stored and processed.

The categories of personal data confected, stored and processed



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- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- · How long the data will be stored.
- · Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What forms of ID will I need to provide in order to access this?

Opus Trust Marketing Ltd. accepts the following forms of ID when information on your personal data is requested:

Passport, driving licence, birth certificate, utility bill (from last 3 months), etc.

Contact details of the Data Protection Officer:

	Data Protection Officer
Contact Name:	Vanessa Peel
Address line 1:	Opus Trust Marketing Limited
Address line 2:	133-137 Scudamore Road
Address line 3:	Leicester
Address line 4:	LE3 1UQ
Email:	data.protection@opustrust.co.uk
Telephone:	0116 232 7500

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