

## Data Protection PSC Task B

### Practical Examples of Privacy Policies for the website

<https://www.bbc.co.uk/usingthebbc/privacy/>

<https://www.mrporter.com/en-gb/content/help/privacy-policy/>

Note: Cookies policy – e-privacy directive

Privacy requirements

<b>What information do we need to provide?</b>	<b>What should we tell people?</b>	<b>When is this required?</b>
The name and contact details of your organisation	Say who you are and how individuals can contact you.	<b>Always</b>
The name and contact details of your representative	Say who your representative is and how to contact them.  A representative is an organisation that represents you if you are based outside the EU, but you monitor or offer services to people in the EU.	<b>If applicable</b>
The contact details of your data protection officer	Say how to contact your data protection officer (DPO).  Certain organisations are required to appoint a DPO. This is a person designated to assist with GDPR compliance.	<b>If applicable</b>

The purposes of the processing

Explain why you use people's personal data. Be clear about each different purpose.

**Always**

There are many different reasons for using personal data, you will know best the particular reasons why you use data. Typical purposes could include marketing, order processing and staff administration.

The lawful basis for the processing

Explain which lawful basis you are relying on in order to collect and use people's personal data and/or special category data.

**Always**

This is one or more of the bases laid out under Article 6(1) of the GDPR.

The legitimate interests for the processing

Explain what the legitimate interests for the processing are.

**If applicable**

These are the interests pursued by your organisation, or a third party, if you are relying on the lawful basis for processing under Article 6(1)(f) of the GDPR.

The recipients, or categories of recipients of the personal data

Say who you share people's personal data with.

**If applicable**

This includes anyone that processes the personal data on your behalf, as well all other organisations.

You can tell people the names of the organisations or the categories that they fall within.

Be as specific as possible if you only tell people the categories of organisations.

The details of transfers of the personal data to any third countries or international organisations

Tell people if you transfer their personal data to any countries or organisations outside the EU.

**If applicable**

Say whether the transfer is made on the basis of an adequacy decision by the European Commission under Article 45 of the GDPR.

If the transfer is not made on the basis of an adequacy decision, give people brief information on the safeguards put in place in accordance with Article 46, 47 or 49 of the GDPR. You must also tell people how to get a copy of the safeguards.

The retention periods for the personal data

Say how long you will keep the personal data for.

**Always**

If you don't have a specific retention period then you need to tell people the criteria you use to decide how long you will keep their information.

The rights available to individuals in respect of the processing

Tell people which rights they have in relation to your use of their personal data, e.g. access, rectification, erasure, restriction, objection, and data portability.

**Always**

The rights will differ depending on the lawful basis for processing – make sure what you tell people accurately reflects this.

The right to object must be explicitly brought to people's attention clearly and separately from any other information.

The right to withdraw consent

Let people know that they can withdraw their consent for your processing of their personal data at any time.

**If applicable**

Consent must be as easy to withdraw as it is to give. Tell people how they can do this.

The right to lodge a complaint with a supervisory authority

Tell people that they can complain to a supervisory authority.

**Always**

Each EU Member State has a designated data protection supervisory authority.

Individuals have the right to raise a complaint with the supervisory authority in the Member State where they live, where they work, or where the infringement took place.

It is good practice to provide the name and contact details of the supervisory authority that individuals are most likely to complain to if they have a problem. In practice, if you are based in the UK, or you regularly collect the personal data of people that live in the UK, you should inform people that they can complain to the ICO and provide our contact details.

The details of whether individuals are under a statutory or contractual obligation to provide the personal data

Tell people if they are required by law, or under contract, to provide personal data to you, and what will happen if they don't provide that data.

**If applicable**

Often, this will only apply to some, and not all, of the information being collected. You should be clear with individuals about the specific types

of personal data that are required under a statutory or contractual obligation.

The details of the existence of automated decision-making, including profiling

Say whether you make decisions based solely on automated processing, including profiling, that have legal or similarly significant effects on individuals. Give people meaningful information about the logic involved in the process and explain the significance and envisaged consequences.

**If applicable**

Whilst this type of processing may be complex, you should use simple, understandable terms to explain the rationale behind your decisions and how they might affect individuals. Tell people what information you use, why it is relevant and what the likely impact is going to be.

Here's another example of unbundled consent requests from [Alfa Romeo](#):

I consent     I do not consent    To marketing activities

Send you relevant marketing information and carry out market research about our products and services so that you don't miss out on current offers. We normally contact our customers by automated or electronic means including e-mail, phone (e.g. SMS, MMS, fax). We sometimes use other means such as web sites, mobile apps, post or automated calls.

I consent     I do not consent    To profiling activities

Analyse your personal preferences, interests or behaviours so that we can send you customised communications that we think you might like.

I consent     I do not consent  
To the communication of the Data to third parties for their own marketing activities

Share your data with companies in our group and selected partners with whom we work closely so that they can send you relevant offers which might interest you. This could include partners in the automotive, financial, insurance and telecommunication sectors. We normally contact our customers by automated or electronic means including e-mail, phone (e.g. SMS, MMS, fax). We sometimes use other means such as web sites, mobile apps, post or automated calls.