

# Contributors Privacy Policy

## Introduction

This privacy policy is for social media contributors whose social media data we process in order to provide services to our clients. Throughout this privacy policy we refer to social media contributors as “you” or “contributor”.

We respect your privacy and are committed to protecting your personal data. This privacy policy will let you know how we look after your personal data while providing our services to our clients and tell you about your privacy rights and how the law protects you.

## Important information and who we are

### Purpose of this privacy policy

This privacy policy aims to give you information on how we, Material, collect and process your personal data while providing our services to our clients.

We track the digital arena and analyse public data to provide our clients with insights into commercial trends, digital behaviour and potential marketing strategies. In doing so we access publicly available information (including personal data) on the internet which has been indexed by social analytics platforms. The information we access and use has been made public by contributors such as you. We conduct research on that data and provide reports and insights to our clients. Some of the information we access and use for our services is personal data because it can identify you (e.g. your handle, name or username on Twitter or Facebook) while other information (which does not identify you) is not.

You, the contributor, have control over the data which you make public and available on the internet. You have rights in connection with any platform you are using to publish your information (including the use of privacy settings) and you also have rights in relation to the data we process which are explained in this privacy policy.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

### Controller

Material, trading as Material UK (Scotland) Limited, is the controller and responsible for your personal data (collectively referred to as “Material”, “we”, “us” or “our” in this privacy policy).

We are responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out below:

**Full name of legal entity:** Material UK (Scotland) Limited

**Email address:** [dataenquiry@wearmaterial.co.uk](mailto:dataenquiry@wearmaterial.co.uk)

**Postal address:** 3rd Floor, 20 South Frederick Street, Glasgow, Scotland, G1 1HJ

**Telephone number:** 0141 204 7970



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Where we are processing your data for the purposes of providing our services to our clients, the relevant clients may also be data controllers in relation to your data. Our clients have their own privacy policies and procedures in place for processing and protecting personal data. If you need more information about one of our clients please contact us. We will not always be able to provide you with information about our clients but where possible we will direct you to them for further information about their data processing practices.

You have the right to 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.

### Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review and the most current version can be found on our website or requested from us on the contact details above.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data) nor does it include information about organisations or corporate bodies.

The data we collect about you will vary based on the information you have made available on social media platforms; what the social media platforms on which you have posted make available to us; and what the social analytics platforms (which aggregate content from social media platforms) make available to us.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username, handle or similar identifier that you have made public via social media
- **Published Data includes content that you publish (publicly) using that name, username, handle or identifier** including your posts, opinion, comments, expressions, interests and activities, occupation, relationship status and family links, health information, gender, location, photographs and profile pictures and anything else you make available in public via social media
- **Contact Data includes direct contact links on social media platforms, phone numbers, e-mail address and home or business address and other social/digital handles or domains that you have made public via social media**

Some Special Categories of Personal Data may be included in the information you make public and which we process (including details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). We only use data which you have made public on the internet. We have no access to data held on private social media accounts.

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### How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
  - third party social analytics platforms such as Pulsar, Followerwonk or Brandwatch (whose databases are made up of publicly available information posted or shared by you); and
  - third party social media platforms such as Twitter, Instagram, Blogs, Forums, Reddit, LinkedIn or Facebook (publicly available sources of information posted or shared there by you).
- **Direct interactions.** If we are interacting with you directly we will usually have your Identity Data and some Published Data already but you may give us additional information about you, such as Contact Data or other Published Data we were not aware of. You may give us this data by corresponding with us on social media, by post, phone, e-mail or otherwise. This includes personal data you provide when:
  - we contact you about influencer / campaign advocacy engagement opportunities; or
  - we discuss influencer / campaign advocacy engagement opportunities with you.

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### How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

To find out more about the types of lawful basis that we will rely on to process your personal data see the section titled 'Lawful Basis' in the enclosed glossary.

Generally, we do not rely on consent as a legal basis for processing your personal data [although if we have been discussing an Influencer engagement opportunity with you, we will get your consent before sending you any further communications from our client].

#### Purposes for which we will use your personal data

We will use your Identity and Published Data for the purposes of providing our services to our clients. In particular, we will analyse such data along with other publicly available data from other contributors in order to provide reports and insights to our clients. Our lawful basis for processing your Identity and Published Data is our legitimate interests in providing our services to our clients and running our business and our client's legitimate interests in carrying out market research for the purposes of running and growing their businesses.

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To the extent that any information we use for the purposes of providing our services to our clients includes Special Categories of Personal Data we are using this data on the condition that is already manifestly made public by you (on a social media platform or otherwise on the internet).

We will use your Identity and Contact Data for the purposes of contacting you to discuss influencer / campaign advocacy opportunities and will do so on the basis of our legitimate interests in providing our services to our clients and running our business and our clients legitimate interests in promoting their business. To the extent that any information we use for the purposes of providing our services to our clients includes Special Categories of Personal Data, we are using this data on the condition that is already manifestly made public by you (on a social media platform or otherwise on the internet).

If either we or our clients contact you directly about any influencer / campaign advocacy engagement opportunities you will be asked for your express opt-in consent at first contact at which time you can decline interest.

### Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we seek to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so (for example an additional influencer / advocacy engagement opportunity for another client).

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

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## Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out here.

- Service providers acting as processors based in the UK who provide IT and system administration services to us, including Certum, IT & System Administrators and Namesco Limited, FatCow and WordPress our third party web services provider. These parties have access to our systems and therefore may have access to your data while it is on our systems.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the UK who require reporting of processing activities in certain circumstances.

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- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- We will share your publicly available Identity, Published and Contact Data with our clients for the purposes of assessing any potential influencer / campaign advocacy engagement opportunities with you.
- We will share any private Contact Data you share with us with our clients if you have agreed for our clients to contact you about an influencer / advocacy opportunity.

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## International transfers

Many of our external third parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, 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 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.
- We enter into agreements with our service providers which provide for the protection of your data on the same level as provided under this privacy policy.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.]

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## Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

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### Data retention

#### How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers and suppliers (including Contact, Identity, Financial and Transaction Data) for seven years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see 'Your Legal Rights' below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

#### Your legal rights

Under data protection laws you have rights in relation to your personal data that include:

- **Request access to your personal data** – Commonly known as a “data subject access request”, this enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of your personal data** - This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **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. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing of your personal data** - Where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. 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.

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- **Request restriction of processing your personal data** - This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - If you want us to establish the data's accuracy.
  - Where our use of the data is unlawful but you do not want us to erase it.
  - 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.
  - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request transfer of your personal data** - We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Right to withdraw consent** - At any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us on [dataenquiry@wearematerial.co.uk](mailto:dataenquiry@wearematerial.co.uk).

### No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

### What we may need from you

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.

### Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.