

1. WHO ARE YOU AND WHAT IS BEACON?

- 1.1 We are Beacon Publishing Ltd of 6 Trossachs Gardens, Belfast, Northern Ireland, BT10 0HX (**we, us, our**).
- 1.2 We provide you with a software-as-a-service tool (**Software**) to enable you to transform your internet blog posts into professionally designed, downloadable content (**Service**). The Service is provided on each of a free and a paid basis.

2. WHAT IS THIS NOTICE?

- 2.1. From time to time we may need to process Personal Data (which is information which can be used to identify someone) in connection with our Service. This Personal Data may be about you or other people. This notice explains how we will use any Personal Data we hold.
- 2.2. We hold Personal Data about the following groups of people (**Data Subjects**):
 - (i) a **Customer**: this is an individual who has registered to use the Service (whether on the free or paid basis). We call this data **Customer Data**;
 - (ii) a **Customer's Data Subject**: this is any individual whose Personal Data is contained in any content is uploaded by you as a Customer into the Software. For example, if you use the Service to improve a blog that you have posted about named living people, each of those people would be a Customer's Data Subject. We call this data **Customer's Data Subject Data**.
- 2.3. As part of our Service, we may need to transfer Personal Data about Data Subjects to third parties (for more details on this have a look at paragraph 8 below). This notice only deals with *our* use of Personal Data. The people we transfer Personal Data are not bound by this privacy notice. This notice should make it clear exactly when and to whom data may be transferred – but if you have any questions feel free to send us an email at kevin@beacon.by
- 2.4. We might need to change this privacy notice from time to time. We will publish our privacy notice on our website (available at www.beacon.by) and do our best to update you directly if we think the changes might affect you. Please do keep an eye on our notice before sending us any Personal Data or uploading it into the Software.

3. ARE YOU A CONTROLLER OR A PROCESSOR?

- 3.1. It depends on who the data is about and where it came from:
 - (a) We are a **Controller** in respect of any Customer Data which we hold. This means that we make decisions about what types of Personal Data we think we need to collect about our Customers and how to use it to make our business work.
 - (b) We are a **Processor** in respect of any Customer's Data Subject Data which we hold. This means we use the Customer's Data Subject Data provided by you strictly and only in accordance with your instructions and not for our own purposes. The only decisions we make in respect of this data are procedural. You are the Controller in relation to the Customer's Data Subject Data you provide to us.

4. WHAT PERSONAL DATA DO YOU COLLECT AND WHERE DO YOU GET IT FROM?

Customers

- 4.1 We may collect and store the following data about you as our Customer:
 - (i) **Information a Customer provides us with directly**. This might include:
 - In relation to the free version of the Service, your company/business's name, your email address and password, your forename and surname and your social media user names and passwords;

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- In relation to the paid service, all of the above together with your full address, VAT number (if applicable), your credit card number and your internet protocol address.
 - Information about your business, workforce and needs;
 - Information about requests, disputes or responses to surveys; and
 - Information about your marketing preferences.
 - Transaction data about services provided to you.
- (ii) **Information which we collect automatically.** This might include:
- Usage data: which might include information about how you use our website or Service;
 - Traffic data: which might include information about websites, ads or links clicked on by you before, during or after visiting our website or Service;
 - Technical data: which might include information about the device used by you to access our website or Service.

For more information about what cookies we use, please see our Cookies Policy, which can be accessed here: http://beacon.by/assets/docs/Cookie_Policy.pdf

Customer's Data Subject Data

4.2 In relation to Customer's Data Subject Data, we will collect and store any and all Personal Data provided by you in relation to each of your Customer's Data Subjects.

5. HOW WILL YOU USE THE PERSONAL DATA YOU HOLD AND WHAT IS YOUR LAWFUL BASIS FOR DOING SO?

Customer Data

- (i) We hold and process data about you as our Customer as a Controller, which means we must have a 'lawful basis' for doing so. We have set out how we use this Personal Data along with our lawful basis in the table below.
- (ii) Anywhere we are relying on legitimate interest we believe that such processing is necessary for the purposes of our **legitimate interest**, which in this case is to function as a business. We consider such use goes no further than a Customer would reasonable expect; is likely to align with the Customer's interests (by enabling us to provide a sustainable business model) and is unlikely to be detrimental to the fundamental rights and freedoms of our Customer.
- (iii) We may collect aggregate data about our Customers' use of Software. Any such data will be anonymised and used for business and market research purposes.

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PURPOSE/ ACTIVITY	DESCRIPTION	TYPES OF DATA	LAWFUL BASIS
To provide our services	To provide our Service which may include support and maintenance of your account and facilitating the set-up and managing payment	Identity Data Contact Data Transaction Data	Necessary for the performance of the contract with you for the provision of our services or taking steps necessary to enter into a contract.
To manage our relationship with you	To notify you of updates to our services or software or updates to our privacy notice	Identity Data Contact Data	Necessary for the performance of the contract with you for the provision of our services or taking steps necessary to enter into a contract. Legitimate Interest
Administration and Dispute Resolution	We may also need to process Personal Data about you to meet our internal administration requirements and for matters such as dispute resolution.	Identity Data Contact Data Transaction Data	Legitimate Interest
Marketing	<p>From time to time we might contact you by telephone or email about updates to our services, new features or functions or new products we are bringing out. We will always include the right to opt out in any such correspondence.</p> <p>We may also use third party services which enable us to promote services to you on third party websites or platforms.</p> <p>Our marketing may be tailored on the basis of what we think your interests are (from looking at traffic and usage data collected using cookies and other similar technologies as well as past transactions and interactions).</p>	Identity Data Contact Data Transaction Data Profile Data Traffic Data	Legitimate Interest

Customer's Data Subject Data

- (i) Since we are acting as a Processor in respect of any Customer's Data Subject Data, we will only use it in accordance with your instructions.

6. DO YOU DISCLOSE PERSONAL DATA TO ANYONE ELSE?

DATA SUBJECT GROUP	TYPES OF DATA TRANSFERRED	RECIPIENT	REASON FOR TRANSFER	RECIPIENT LOCATION
Customer Data Customer's Data Subject Data	All types held	Staff and employees	Strictly to the extent necessary to provide our Service	Northern Ireland, Bulgaria
	All types held	Host Service Provider	Store data	USA
	All types held		If we are under a duty to disclose or share Personal Data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements or to protect the operation of our website, or the rights, property, or safety of us, our customers, or others.	Currently unknown
	All types held	Buyer	if we sell, transfer or merge parts of our business or our assets. If a change happens to our business, then the new owners will only be entitled to use Personal Data in accordance with the provisions set out in this privacy notice.	Currently unknown
	Credit Card information	Stripe	Credit card transactions	Ireland
	All types held	Intercom	Providing help desk and email services for the Software and the Service	USA
	All types held	Baremetrics	Providing financial planning service	USA

If you have any questions about who your data might be transferred to please send us an email kevin@beacon.by

7. WHAT SECURITY PROCEDURES DO YOU HAVE IN PLACE?

7.1 We implement robust security procedures to safeguard the data we hold.

7.2 There are some steps you can take to help make sure that your data is protected. For example:

- (a) if you are contacting us with a query or complaint, only ever give us your work details rather than your personal contact details;
- (b) if you are sending any financial details or sensitive information, consider sending it in separate emails or encrypted, password protected documents; and
- (c) make sure that you keep any user names and passwords associated with your Service account secure.

8. WHERE DO YOU STORE THE PERSONAL DATA YOU COLLECT?

8.1 Our servers are currently based in USA.

8.2 If you would like further information about where we store your data, please contact us at kevin@beacon.by

9. FOR HOW LONG DO YOU STORE PERSONAL DATA?

Customer Data

9.1. Our retention policy for Customer Data is follows:

- (a) we may store data related to transactions for up to 7 years to ensure that we have sufficient records from an accounting and tax perspective. Any such data retained for a longer period will be anonymised so that an individual cannot be identified;
- (b) we may archive data relating to negotiations, contracts agreed, payments made, disputes raised and your use of our software for up to 6 years to protect ourselves in the event of a dispute arising between you and us. Any such data retained for a longer period will be anonymised so that an individual cannot be identified;
- (c) we may retain data which is held for marketing purposes until the Data Subject opts out. We will always include an opt-out in every marketing communication we send out.
- (d) we may store aggregate data without limitation (on the basis that no individual can be identified from the data).

Customer's Data Subject Data

9.2. Since we hold Customer's Data Subject Data as a Processor, we will only retain it for as long as you have an account with the Service. Once that contract terminates, we will securely delete such data within 30 days.

10. WHAT RIGHTS DO I HAVE IN RESPECT OF ANY PERSONAL DATA YOU HOLD ABOUT ME?

10.1 Data Subjects have the following rights in respect of Personal Data relating to them which can be enforced against whoever is the **Controller**. This will be us in respect of Customer Data, and you in respect of Customer's Data Subject Data:

- (a) **Right to be informed:** the right to be informed about what Personal Data the Controller collects and stores about you and how it's used.
- (b) **Right of access:** the right to request a copy of the Personal Data held, as well as confirmation of:
 - (i) the purposes of the processing;
 - (ii) the categories of personal data concerned;
 - (iii) the recipients to whom the personal data has/will be disclosed;
 - (iv) for how long it will be stored; and
 - (v) if data wasn't collected directly from you, information about the source.
- (c) **Right of rectification:** the right to require the Controller to correct any Personal Data held about you which is inaccurate or incomplete.
- (d) **Right to be forgotten:** in certain circumstances, the right to have the Personal Data held about you erased from the Controller's records.

- (e) **Right to restriction of processing:** the right to request the Controller to restrict the processing carried out in respect of Personal Data relating to you. You might want to do this, for instance, if you think the data held by the Controller is inaccurate and you would like to restrict processing the data has been reviewed and updated if necessary.
- (f) **Right of portability:** the right to have the Personal Data held by the Controller about you transferred to another organisation, to the extent it was provided in a structured, commonly used and machine-readable format.
- (g) **Right to object to direct marketing:** the right to object where processing is carried out for direct marketing purposes (including profiling in connection with that purpose).
- (h) **Right to object to automated processing:** the right not to be subject to a decision based solely on automated processing (including profiling) which produces legal effects (or other similar significant effects) on you.

10.2 If you want to avail of any of these rights, you should contact us immediately at kevin@beacon.by If you do contact us with a request, we will also need evidence that you are who you say you are to ensure compliance with data protection legislation.

11. WHAT HAPPENS IF I NO LONGER WANT YOU TO PROCESS PERSONAL DATA ABOUT ME?

11.1 You may notify us at any time that you no longer want us to process Personal Data about you for particular purposes. or for any purposes whatsoever. This may have an impact on the services you receive from us. For example, if you ask us to stop processing Personal Data about you, you will no longer be able to access Software since we will not be able to identify you.

11.2 A request to stop receiving direct marketing communications will not impact your access to Software.

12. WHO DO I COMPLAIN TO IF I'M NOT HAPPY WITH HOW YOU PROCESS PERSONAL DATA ABOUT ME?

12.1 If you have any questions or concerns about how we are using Personal Data about you, please contact our Data Protection Officer immediately at our registered address (see paragraph 1.1 above) or by email to kevin@beacon.by.

12.2 If you wish to make a complaint about how we have handled Personal Data about you, you may lodge a complaint with the Information Commissioner's Office by following this link: <https://ico.org.uk/concerns/>.

13. WHAT DO ALL OF THE DEFINED TERMS IN THIS PRIVACY NOTICE MEAN?

13.1 Throughout this notice you'll see a lot of defined terms (which you can recognise because they're capitalised). Where possible, we've tried to define them as we go, but we thought it might be useful to have a glossary at the end for you. Anywhere in this notice you see the following terms, they'll have the following meanings:

Customer Data means Personal Data about you;

Customer's Data Subject means any individual whose Personal Data is contained in any content is uploaded by you as a Customer into the Software;

Customer's Data Subject Data means the Personal Data of any Customer's Data Subject;

Controller is a legal term set out in the General Data Protection Regulation (**GDPR**), it means the party responsible for deciding what Personal Data to collect and how to use it;

Data Subject means the individual who can be identified from any Personal Data;

Software means our cloud-based software tool which we use to provide our Service;

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Personal Data means data which can be used to identify a living individual. This could be a name and address or it could be a number of details which when taken together make it possible to work out who the information is about. It also includes information about the identifiable individual;

Processor is another legal term set out in the GDPR, it means the party who has agreed to process Personal Data on behalf of the Controller.

Service means the service we provide to you to enable you to transform your internet blog posts into professionally designed, downloadable content;

we, us, our means Beacon Publishing Ltd of 6 Trossachs Gardens, Belfast, Northern Ireland, BT10 0HX.

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