

## Privacy Notice for influencers with Brown Betty

### Introduction

This Privacy Notice is for the individual influencers Brown Betty gets in touch with. Brown Betty are committed to informing how we deal with your personal data, to give you control over how it is used, and to protect it. You will find information about what sort of information we hold about you, how and why we collect it, how we use it, and how we keep it secure. This Privacy Notice also tells you about your rights and how you can exercise those rights. Finally, it tells you how you can exercise your preferences to manage the information, and if you do not wish to be in our media database, how to ask us to take you out.

### About Brown Betty

Brown Betty Limited is a PR, Influencer Marketing and Marketing Consultancy company registered in England and Wales with registered number 08929104. More details about the company can be found on our website at [www.brown-betty.com](http://www.brown-betty.com).

Brown Betty is the data controller and is responsible for your personal data (collectively referred to as Brown Betty, "we", "us", or "our" in this Privacy Notice). Our full contact details are as follows:

Brown Betty Limited  
27 Mortimer Street  
London W1T 4BD

If at any time you have any questions about this Privacy Notice or the way we use your personal data please contact our Data Protection Officer by email at [Privacy@brown-betty.co.uk](mailto:Privacy@brown-betty.co.uk)

### The Media Contact List

Our media contact list is a repository of information (and in particular contact information) relating to influencers like you. We call you an "influencer" because you have the ability to influence the behaviour and opinions of others. This term includes traditional journalists working for news publications (print and online), freelance journalists, and other influencers including social media influencers on Twitter, Facebook, Instagram, YouTube, Twitch and other platforms. The media contact list is only used internally by Brown Betty, by employees and consultants who are bound by Brown Betty's privacy policy.

### Personal Information We Collect

We limit the information that we collect for use in the media contact list to enable us to engage with you in a meaningful and targeted way. The information includes basic information such as your name and contact details, your job title, public social media profiles, areas of interest to you, and some brief biographical information about your career.

### The Types of Personal Data We Collect

We only collect data that is necessary to carry out our business. We collect, use, store and transfer different kinds of data about you which may include the following:

- Prefix and name
- Gender
- Job title
- Employment history
- Work address
- Telephone number
- Fax number
- Work email address

- Personal email address
- Social media handles
- Links to social media pages
- Number of social media followers
- Social media profile pictures
- Pitch preference (ie. how you wish to be contacted)
- Topics: “Beat” (ie. subject matters you wish to write about)
- Target groups

We do not hold any sensitive person data about you, such as data about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union memberships, data about your health and genetic and bio metric data unless you have clearly put such data into the public domain yourself (e.g. you have made such information available to the public by writing about it or by posting it on your social media profile).

### **How We Collect Your Personal Data**

Majority of the information we hold about you is obtained from publicly available sources or Cision Ltd’s MyGorkana database (<http://www.gorkana.com/>). This includes your publicly available social media profiles and websites, information about you that is published by your employer (e.g. on your publication's own website) and information from articles you may have written.

We collect your data either directly from you, from publicly available sources, or Cision Ltd’s MyGorkana database such as:

- Articles or blogs you may have written
- Vlogs you may have created
- Your own website
- Your employer's websites
- Your publisher's websites
- Your publicly available social media profiles (including, for example, Facebook, Instagram, Twitter, and YouTube, Twitch, and LinkedIn)
- Other publicly available online sources

We also collect data from other sources including:

- Other influencers (who may, for example, tell us if you have changed jobs)
- Your employer (if you are employed)
- Your line manager or press team

### **Verification**

We verify that your contact details are correct by checking against your social media profile or websites you appear on.

### **The Purposes for Which We Will Use Your Personal Data**

Using this information we then include it in our media contact list.

We use our media contact list via one of our mailing platforms to send you information that we think you might be interested in. This is also beneficial for you as it means you receive targeted press releases, news and other information that may be helpful for you. Our primary role is to facilitate the efficient communication between our customer and influencers.

As well as sending communications to influencers, we also monitor your interaction with the communications that we send you (for example, whether you have opened an email sent via one of our mailing platforms or clicked on any links contained in that email).

Your personal data may also be processed in one or more of the following ways:

- Sending out press releases: we send you press releases about things you might be interested in.
- Creating lists: we create lists of influencers. For example, we send out a press release to influencers with special knowledge of mobile industry in South West England. We create a media contact list of particular interest, create and save a list of those influencers, and then send a press release to those influencers on the list.
- Exporting influencer data: we may export influencer Data from our media contact list provided that we are in accordance with all applicable laws.
- Profiling and Tracking: see How We Use Your Personal Data for Profiling and Tracking for more information.
- Maintaining the administration of our media database.
- Maintaining contact, handling enquiries, complaints and disputes.
- Compliance with all applicable laws and regulations.

### **Legal Basis for Processing Your Personal Data**

We process your personal data to provide our services to our customers. We believe that it is in our legitimate business interests to do so. Processing your data in this way also benefits you as an influencer and also our customers. You will receive focused information from our customers, often ahead of general release, giving you material to write about that is relevant to you and your audience. Our customers are able to communicate more efficiently to influencers who are likely to want to hear what they have to say. We consider and balance any potential negative impact on you and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where we believe that our interests are overridden by any unwarranted adverse impact on you. If at any time you want us to remove you from our media database please email us at [Privacy@brown-betty.co.uk](mailto:Privacy@brown-betty.co.uk) and we shall do so as soon as possible.

We may also use your personal data in the following ways:

- Media requests: Influencers are free to contact us and ask for help sourcing upcoming stories or customers who can speak to a specific topic. For example an influencer writing about virtual reality may contact us and request to hear from virtual reality expert.
- Alerts: Influencers can also request to receive updates on changes to other contacts within our media contact list, typically changes to roles or moves within the industry.
- Marketing: Influencers can also receive surveys or invitations to events from Brown Betty or our customers.

### **How to Amend or Remove Your Profile**

If at any time you want to see or amend your influencer Profile, please email us at [Privacy@brown-betty.co.uk](mailto:Privacy@brown-betty.co.uk). Similarly, if at any time you want us to take you out of our media contact list altogether please email us at [Privacy@brown-betty.co.uk](mailto:Privacy@brown-betty.co.uk) and we shall do so as soon as practicable.

### **Children**

Our media contact list is not intended for children and we do not knowingly collect personal data relating to children. If you are under the age of 16, please let us know and we will take you out of our media contact list.

### **How We Use Your Personal Data for Profiling and Tracking**

We may use your personal data for profiling purposes. The profiling we carry out and how it is used is quite limited. We use profiling to evaluate your personal preferences, interests, behaviour and audience. We may, for example, use profiling to understand what subjects you like to talk about and the extent of your audience such as number of social media followers you have. This in turn helps us communicate to you more efficiently and effectively.

You have the right to object to us profiling with your personal data. If you would like us to stop profiling with your personal data, then please contact us at [Privacy@brown-betty.co.uk](mailto:Privacy@brown-betty.co.uk) and we will remove you from our media contact list.

We also carry out some monitoring of your engagement with the content that you are sent by us. This may include placing a cookie on email content sent to you.

### **Profiling**

We combine the personal data from your influencer profile with the publicly available content that you have produced. Using profiling, we will be able to search these two publicly available data sets and:

- Understand what subjects you are interested in: we may, for example search a key word such as "MOBA". Our media contact list will then list all influencers who are talking about MOBA in their social media posts, articles, etc.
- View and evaluate your content: We may search for your name (or the name of any other influencer) and view the actual content you have produced. Your content may then be given a 'favourability score', which is calculated by analysing the words you have used in the content concerned against an agreed list of words that we consider to be 'favourable' or 'unfavourable' according to our preferences/industry focus. We may also give an automated 'tone' score to any given piece of your content which, depending on the words you have used in the content, will tell the reader whether you view the topic or subject matter in a positive, negative or neutral light. This is derived by looking at groupings of words such as "good", "great", "brilliant", "awful", "sad", etc.
- Understand your audience and its location: We may see your publicly available social media feeds, together with data from those feeds including for example how many Twitter followers you have and (using data provided to us directly by Twitter) and roughly where they are based geographically.

The results of the profiling that we carry out enable us and our customers to better identify influencers that are interested in the kind of communications our customers want to send.

### **Tracking**

When we send you communications via our mailing platforms, those communications may contain software that lets the sender know if you have opened the communication and if so which links you

have clicked on. This helps us understand what content you are or are not interested in, and tailor future communications accordingly.

### **How We Share Your Personal Data and With Whom**

We may share your personal data with our customers, external third parties, and other parties detailed below. We may also transfer your personal data outside of the European Economic Area (EEA), but only when specific safeguards have been put in place in order to protect your personal data.

We may share your personal data with one or all of the following:

- Customers: our customers are typically communications and marketing departments within businesses or other institutions who appoint us to communicate with you on their behalf. Our customers come from all sectors.
- External Third Parties: these may include:
  - Service providers who work on behalf of Brown Betty for the performance of any contract we enter into with them, for example: Freelance PR Consultants and Specialists.
  - Professional advisors including lawyers, accountants and insurers where we need to do so in order to comply with our legal obligations or for other business reasons.
  - Regulators, copyright bodies and other authorities who require reporting of processing activities in certain circumstances.

### **External Third Parties list**

We may also share your personal data with 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 require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with binding contractual obligations which satisfy the requirements of the data protection legislation.

### **International Transfers**

If and when your personal data is transferred outside of the EEA we do so in accordance with model contracts approved by the European Commission to ensure that there is an adequate level of protection for your personal data.

### **Our security measures**

We are committed to protecting your personal data. We put in place safeguards including appropriate technologies, processes, and contractual arrangements, so that the data we have about you is protected from unauthorised access and improper use, and we will also not keep your personal data for longer than is necessary. However, we do not guarantee that unauthorized access will never occur.

### **Third Party Software/Service**

We may be using third party software and/or service to communicate with you. Such software may include without limitation, Madmimi (<https://madmimi.com/>).

### **How Long Will We Use Your Personal Data?**

We will keep your personal data only for as long as is necessary for the purposes set out in this privacy notice and to fulfil our legal obligations, but not longer than 7 years after you ask to stop receiving communications. We will not keep more data than we need.

### **Your Rights**

Under certain circumstances, if you reside in the EU or if your data is processed in connection with one of our European businesses, you have rights under data protection laws in relation to your personal data, including the right of access; the right to rectification; the right to erasure; the right to restrict processing; the right to data portability; and the right to object. If you wish to exercise your rights please contact [Privacy@brown-betty.co.uk](mailto:Privacy@brown-betty.co.uk).

We respect and honour these rights and will help you to exercise them insofar as we are able. These rights are not absolute – in some cases they will not apply to you, or to the particular use that we are making of your data, and there are exceptions (for example if we have to process the data to comply with our own legal obligations) but if that is the case we will let you know.

Your Rights Include the Right to:

- Access your personal information (via what is commonly known as a "data subject access request").
- Require us to correct any mistakes in your information which we hold.
- Require to erase personal information concerning you in certain situations.
- Receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations.
- Object at any time to processing of personal information concerning you for direct marketing,
- Object to decisions being taken by automated means (including profiling) which produce legal effects concerning you or similarly significantly affect you.
- Object in certain other situations to our continued processing of your personal information. Otherwise restrict our processing of your personal information in certain circumstances.

For further information on each of these rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individual rights under the General Data Protection Regulation.

You also 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. We hope that we would be able to resolve any concerns that you may have before you approach the ICO so please do contact us in the first instance.