

Privacy Policy

KM Media Group Limited (**we, us, our**) is committed to protecting the personal information you entrust us with and respecting your privacy. We make every effort to ensure that your information is processed lawfully and carefully.

This policy (together with our **Terms and Conditions** and any other documents referred to) is the main Privacy Policy for KM Media Group and all associated print, broadcast and digital brands, including...

- KentOnline
- KMFM
- Canterbury Extra
- East Kent Mercury
- Folkestone & Hythe Express
- Gravesend & Dartford Messenger
- Kent Messenger
- Kentish Express
- Kentish Gazette Group
- Medway Messenger
- Messenger Extra
- Sheerness Times Guardian
- Sittingbourne News Extra
- Thanet Extra

This includes the following websites which form the KentOnline Network:

- **kentonline.co.uk**
- **destinationkent.co.uk**
- **kenthomes.co.uk**
- **kentjobs.co.uk**
- **kentmotors.co.uk**
- **kentweddingday.co.uk**
- **kmanouncements.co.uk**
- **kmclassifieds.co.uk**
- **kmcreate.co.uk**
- **kmfm.co.uk**

- kmmediagroup.co.uk
- kmtv.co.uk
- mykentfamily.co.uk

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Please note that there may be other privacy policies that apply to certain services we provide. Please read these when you register or subscribe for these services.

If you have any queries about this notice or would like to make requests to exercise your rights, please email privacy@thekmgroup.co.uk

Who we are

KM Media Group Ltd is a multimedia company producing high quality media products that help make Kent a better place to live and work. Registered in England. Company No. 8528676.

Our head office address is **Medway House, Ginsbury Close, Sir Thomas Longley Road, Medway City Estate, Strood, Rochester, Kent ME2 4DU.**

KM Media Group Ltd is registered with the Information Commissioner's Office (ICO) as a "data controller". Registration number ZA021468.

To find out more about KM Media Group, owned by Iliffe Media Ltd, please visit www.kmmediagroup.co.uk

Please email privacy@thekmgroup.co.uk to submit any questions, comments and requests regarding this Privacy Policy.

The information we collect from you

We may collect and process information about you (the "data subject") for either personal or professional reasons, depending upon the circumstances in which they are collected, which will be made clear to you at the time of collection.

We may collect and process the following information about you:

- information that you provide in person (including at events) or by post, phone or electronically – including by email, forms on our websites or via SMS
- information provided at the time of registering to use one of our websites, to use one of our professional services (e.g. advertising), subscribing to newsletters, entering competitions, posting material, raising general enquiries or requesting further services;
- certain information when you report a problem with our websites or regarding the services provided by us;

- details of any correspondence in the event that you contact us;
- survey information, which is used for research purposes, although you do not have to participate in them; and/or
- details of your visits to our websites including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own purposes or otherwise and the resources that you access.

We may ask you to provide personal information either as a private individual or as the representative of a company, business or organisation; including non-profit clubs, charities and societies.

Some or all of the following personal information may be collected, but only where absolutely necessary.

- Title/Honorific
- Name
- Company you are employed with and/or otherwise are representing if your dealings with us (if applicable/relevant)
- Professional Title, Role and/or Responsibilities (if applicable/relevant)
- Home or Business Address and/or Postcode
- Personal and/or Professional Email (Landline and/or Mobile)
- Personal and/or Professional Telephone (Landline and/or Mobile)
- Age / Date of Birth
- Social media profiles (if applicable)
- Marketing preferences

With regard to each of your visits to our websites we may also automatically collect technical information about your visit.

We may collect this information for system administration, to report aggregate information to our advertisers or otherwise in accordance with this Privacy Policy. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

Whilst you can access the websites and browse through certain parts of the websites without disclosing personal information, if you wish to use certain services offered on some of the websites or obtain certain information made available by us, you may be required to share some personal information with us. If you choose not to provide the information you may not be able to use the service that has been offered or obtain the information you seek.

Additionally, where you have registered and/or logged in to our websites using social media accounts such as Facebook and Twitter, we may capture certain information in accordance with the terms and conditions of the applicable service provider.

Cookies

Our websites uses cookies to distinguish you from other users of our websites. This helps us to provide you with a good experience when you browse our websites and also allows us to improve our websites. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy

Where We Store Your Personal Data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (EEA). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

Security

Whilst we have implemented certain technical and organisational measures to protect personal information submitted via our websites from unauthorised or unlawful processing and against accidental loss or destruction or damage, unfortunately the transmission of information via the Internet is not completely secure and we cannot guarantee the security of your data transmitted to our websites; any transmission is at your own risk.

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. You must not share your password with anyone.

Our websites contain links to other sites operated independently of KM Media Group Limited by third parties, which provide information and/or services and which are not covered by this Privacy Policy. We cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and you should exercise caution and look at the privacy statement applicable to the site in question.

How long we keep your Personal Information

When we obtain your personal data our policy is to keep it only for as long as is necessary for the purpose for which it was collected. However, it may be necessary to retain the information for a longer time, which we will detail here.

If your data has been submitted via post for a competition entry, your information will be destroyed no more than one month following the closing date of the competition.

However, it may be necessary to make a digital copy in some instances. (For example, to record the identity of a winner.)

If your data is submitted to us electronically (online or via SMS) in order to make contact with us, including taking part in a competition, your data will be held for a maximum of 5 years. In order to satisfy the requirements of the competition and so that an accurate record of your dealings with us is accessible should any queries arise within that period.

Submissions via kmfm.co.uk are recorded in the AudioSpace platform provided by Cyclone Digital and retained for a period of 5 years.

We use the shortcode 87474 for all contact via SMS messages. This shortcode and the platform to access the messages (mGage Communicate Pro) are provided by mGage Europe Limited (trading as mGage), acting as a “data processor” for us.

When you contact us for the first time using your mobile phone number, a subscriber profile will be created. mGage, as a communications service provider, have a regulatory obligation to retain subscriber profiles and related message history data for a minimum of one year.

When you contact us via SMS we request you provide a limited amount of personal information (name, postcode and, in some instances, postal address) so that we may identify you. If you are under 16 you must also provide your date of birth in the format DD/MM/YYYY.

When you place an advertisement with us you are subject to our “Conditions of Acceptance of Advertisements” [[click here to view](#)] and as a customer your data will be retained for upwards of 5 years to enable us to comply with our legal and contractual obligations and maintain a complete record of your transactions with us.

Legal bases for processing data and how we use it

We will only process your personal data where at least one of the six lawful bases for processing are applicable. These grounds are Consent, Contract, Legal obligation, Vital interests, Public task and Legitimate Interests

Information you provide.

This information may be used...

- to take specific steps before entering into a contract with you based on **legitimate interests**, such as:
 - providing you electronically with information that you request from us, or
 - creating a record/account on one of our database systems;
- to carry out our obligations arising from any **contract** entered into between us;
- to provide customer care and support on the grounds of **legitimate interests**
- to provide you with information about products and/or services we offer where a) we have your explicit **consent**, or b) where you are a customer who was given

an opportunity to opt-out of receiving such information at the time your data was recorded;

- to notify you about changes to our websites and/or services on the basis of our shared **legitimate interests**;
- to ensure that content from our websites is presented in the most effective manner for you and for your computer (or device) on the basis of **legitimate interests**; and /or
- for internal record keeping on the basis of our shared **legitimate interests**;
- to comply with **legal obligations**

Information collected about you.

This information may be used...

- to administer our websites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes on the basis of **legitimate interests**;
- as part of our efforts to keep our websites safe and secure on the basis of **legitimate interests**; and/or
- to make suggestions and recommendations to you and other users of our websites about services that may interest you or them only where we have **consent**;
- to comply with **legal obligations**.

Information received from other sources.

We may receive information about you if you use any of the other websites we operate or the other services we provide. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them. This information may be combined with information you give to us and information collected about you. This information, and the combined information, may be used for the purposes set out above and below (depending on the types of information received).

Your information may be shared with selected third parties, including:

- our analytics and search engine providers who assist in the improvement and optimisation of our websites; and/or
- our business partners or suppliers, for the performance of any contract entered into with you and in order to provide you with our products and/or services.

Your personal information may be disclosed to other third parties:

- in the event that we sell or buy any business or assets, in which case your personal data may be disclosed to the prospective buyer or seller of such business or assets;

- if we or substantially all of our assets are acquired by a third party, in which case personal data held by it about our users may be one of the transferred assets;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms of Use; or
- otherwise in accordance with this Privacy Policy.

Electronic Mail

We may use your email address to make contact with you. In some instances this will be based on legitimate interests, but in most cases this will only be done where we have your explicit consent.

1. Service notices

If you have signed up for a service using your email address (e.g. registered an account or set up a subscription), this email address may be used to contact you occasionally with relevant information about those services and your details. This may include, but is not limited to, changes to terms and conditions (including this Privacy Policy), opportunities to amend/update your details or copyright requests. The legal basis for this activity is legitimate interests.

2. Newsletters

We use third party providers Campaign Monitor and Pure360 to send a variety of email newsletters. These often include, but are not limited to, summaries of newly added website content.

We will only send our email newsletters to those who have given us permission to do so. In order to subscribe to these services, an individual has to submit their email address. This data is shared with / processed by one or both of these service provider/s to deliver the service/s on our behalf.

Opening and click behaviours are recorded using industry standard technologies to help us monitor and improve our newsletters.

Data is stored on the service provider's secure server/s. Our service providers are not permitted to use the data for their own purposes nor to sell or distribute it on to any other individual, organization or business under any circumstances.

Recipients can unsubscribe from newsletters individually at any time by clicking on the 'Unsubscribe' link.

Please note this is an automated service. Should any errors occur in submitting an unsubscription request, please use email privacy@thekmgroupp.co.uk for assistance.

3. Marketing

If you have voluntarily given your consent to receive marketing communications, these will come only from us and, if you agree, from any named third party you have agreed to have your data shared with.

Our marketing emails include details of promotions, products and services, including competitions and opportunities to take part in surveys. We may also share details of advertising opportunities.

We use a third party provider, Pure360, to send our marketing emails. The data you give us permission to use is shared with this “data processor” to do this.

The information provided will be kept no longer than 5 years from the last recorded opening and only used to contact you in accordance with your established preferences. You can change your preferences or unsubscribe at any time.

Opening and click behaviours are recorded using industry standard technologies to help us monitor and improve our communications.

Data is stored on the service provider's secure server. Our service provider is not permitted to use the data for their own purposes nor to sell or distribute it on to any other individual, organization or business under any circumstances.

Recipients can unsubscribe from email marketing at any time by clicking on the 'Unsubscribe' link.

Please note this is an automated service. Should any errors occur in submitting an unsubscription request, please use email privacy@thekmgroupp.co.uk for assistance.

Children's data

We do not collect or use children's data for any advertising or marketing purposes, but we undertake limited processing of personal information about children under the age of 16.

Purposes for which data is collected include prize draw competitions in which children may enter themselves, picture voting competitions ("Cute Kids" competitions) and the publishing of drawings by children and/or class photographs in agreement with the schools.

Data used for the "Cute Kids" features is collected and shared with us by The Photography Company, who gain consent from parents/guardians to disclose this information to us for this purpose only.

Data submitted by those under 16 for competitions is retained for no longer than is necessary. (i.e. until a winner has been identified and informed)

Where pictures of, or by, children are published alongside personal information, it is done so with the explicit consent of parents/guardians and/or the school each individual attends.

Please note that detailed data for children is processed for individuals who are self-employed foot distributors of newspapers. Their information is held on a secure database, provided by “data processor” Miles 33, on the basis of contractual necessity and legal obligation.

We do not knowingly collect any data from or about children online, with the exception of the annual Ward & Partners Children's Awards, for which we act as a "data processor". Visitors to KentOnline are encouraged to nominate children, as well as adults, for awards recognition. Submissions can include a child's name, age and home address. This data is provided to Kent Community Foundation (the "data controller") and also shared with Ward & Partners (part of Arun Estate Agencies). We retain this information for no longer than 2 weeks following the closing date for submissions.

Your rights

You have the right...

- to be informed (to have the reasons behind the collection and use of your personal information clearly explained);
- of access (to be provided, within one month of making a verbal or written request, a copy of any data about you that we retain – this is also known as a "subject access request") at no charge;
- to rectification (correction of your personal data when incorrect or out of date etc. within one month of receipt of a verbal or written request);
- to erasure (deletion of your personal data within one month of making a verbal or written request in instances where such a request does not conflict with other legal bases for its retention);
- to restrict processing in certain circumstances (to be carried out within one month of your making a verbal or written request);
- to data portability (to receive a copy of the data you've provided to us, in a structured, commonly used and machine readable format, either to yourself or directly to another data controller.);
- to object to your personal data being processed (and to get a response within one month of your verbal or written request being received).

You also have rights in relation to automated decision making and profiling. We will only carry out this type of processing where the decision is:

- necessary for the entry into or performance of a contract; or
- authorised by Union or Member state law applicable to us; or
- based on your explicit consent.

Concerns and complaints

If you have a question, query or concern about how we use your personal data, please contact us at privacy@thekmgroup.co.uk and we will do our best to respond within 72 hours.

If you feel that your data, or a request related to your data, has not been handled correctly, you have the right to lodge a complaint with the Information Commissioner's Office (ICO). You can contact them by calling **0303 123 1113** or going to **www.ico.org.uk/concerns**.

This policy was last updated on 16.05.2018