

WHAT IS THE GDPR?

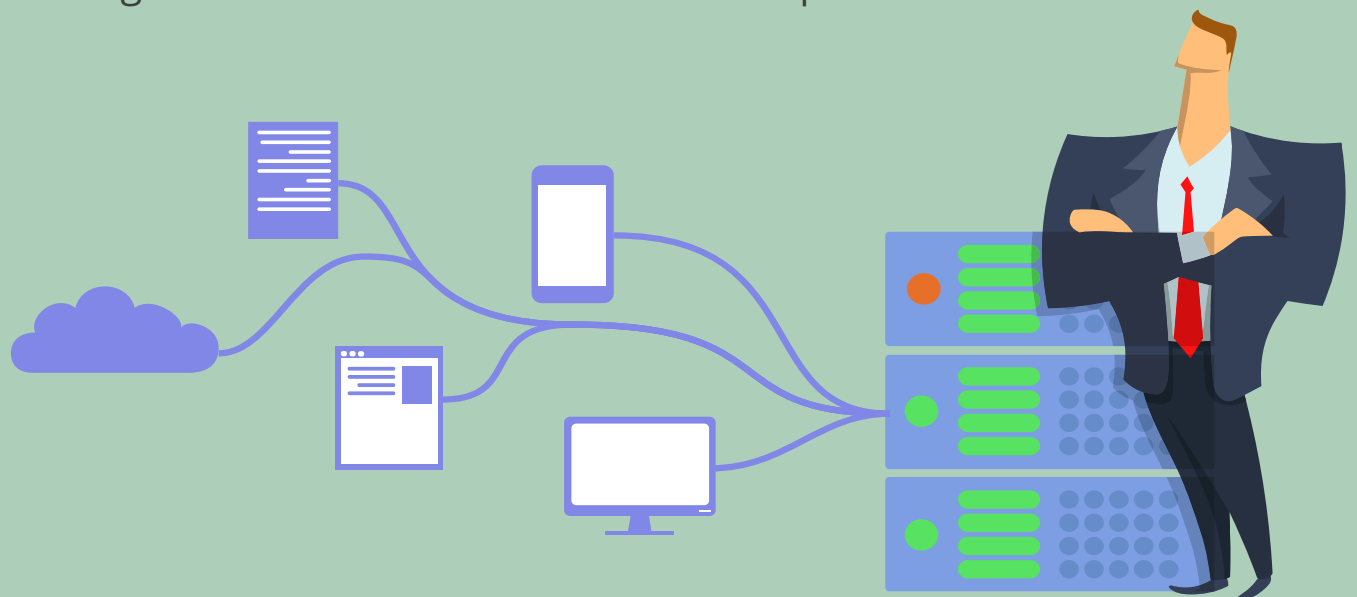


The General Data Protection Regulation (GDPR) comes into force on 25 May and many companies are now changing processes and practices to ensure they're GDPR compliant.

The GDPR is the EU's new data regulation, which will replace previous data protection law and gives everyone in the EU greater control over their data¹. It says that every company must take responsibility for personal data processing, and explain to data subjects what they're doing and why.

In the UK, the Information Commissioner's Office (ICO) is responsible for making sure everyone is complying with the new regulation. The ICO can investigate or even issue fines for non-compliance.

Here at Vuelio, we thrive on professionalism and best practice, and that applies to our data processing too. We've been managing huge volumes of data for decades, so when it comes to the new regulations, not only are we compliant – we can help you comply too.



¹It applies to the UK even after we exit the European Union

WHAT KIND OF DATA IS SUBJECT TO THE GDPR?



The GDPR applies to personal data – which is information that can be used to identify a person either directly or indirectly. Direct identifiers may include a name, email address or identification number; an indirect identifier is information that can be combined with other information to identify an individual, like job title and company, or postcode and house number.



The GDPR sets out rules for processing such data, governing everything from its collection and storage to its availability and deletion.

The GDPR has fundamental principles that say all personal data must be:

1. Processed lawfully, fairly and transparently
2. Collected for specified, explicit and legitimate purposes
3. Adequate, relevant and limited to its intended purpose
4. Accurate and up to date
5. Kept only as long as it is needed
6. Processed securely so it is protected against data breaches

It is your responsibility to follow these principles when processing any personal data.

WHAT KIND OF DATA DOES THE COMMS INDUSTRY PROCESS?



The industry processes a huge amount of data on a daily basis, not all of it comms specific (for example, every company processes the data of their employees, which falls under the GDPR).

Typically, the following tasks require data processing:

- Influencer outreach
- Enquiry management
- Event management
- Building subscription lists
- Campaign and media analysis
- Managing client information

The Vuelio software suite is a complete communications package, and when you're using Vuelio you may be processing data in the following ways:

- Searching for influencers and building media lists
- Contacting influencers
- Monitoring coverage
- Analysing and reporting on your work
- Managing incoming enquiries, from the media, other businesses or the public



DATA CONTROLLER OR DATA PROCESSOR?



A big part of GDPR is knowing when you're a Data Controller or Data Processor – both have responsibilities under the new regulations. Data Controllers decide how and why data is collected, managed, stored, used and deleted. Data Processors are used by the Data Controllers to carry out their data processing – they're companies that are contractually obliged to do as they're told with the Data Controller's gathered data and nothing else.

When using Vuelio, comms professionals are Data Controllers. Because we build and maintain an influencer database AND provide it within a platform to our clients, Vuelio acts as both a Data Controller AND a Data Processor.

As a controller, you need to track when and how you gathered data, store it securely and remove it if required. If you're a processor, you're required to process data as instructed by the controller, in a legal manner – you're still responsible for following the law.



VUELIO AS A DATA CONTROLLER AND A DATA PROCESSOR



Vuelio as a Data Controller

Vuelio maintains an up-to-date database, which includes profile and category information to help communications professionals target relevant influencers in a timely manner, which stops influencers receiving untargeted comms or spam. We also use influencer data to create new data, for example when we apply an algorithm to a range of media metrics to create our unique Influencer Score. Everything we do is designed to enrich each listing and present a more comprehensive view of the contacts in our database to promote productive, two-way comms.

Our in-house research team manages and maintains this Database every day, making changes when influencers move jobs, switch roles and update their interests. It's important for us to make the database as accurate as possible because we want the best results for our clients, which in turn helps them – and us – maintain good relationships with the influencers.

We are Data Controllers because we collect the data on influencers and decide how it's stored – in our secure systems – and for what purpose – for the building and maintaining of the most accurate, comprehensive and up-to-date influencer database.

Vuelio as a Data Processor

When our clients use the database, add their own notes or use the system to manage private contacts, Vuelio becomes the Data Processor. We're not deciding how the data is used or managed, our clients are – so when they use our software, they act as Data Controllers.

TRACKING DATA



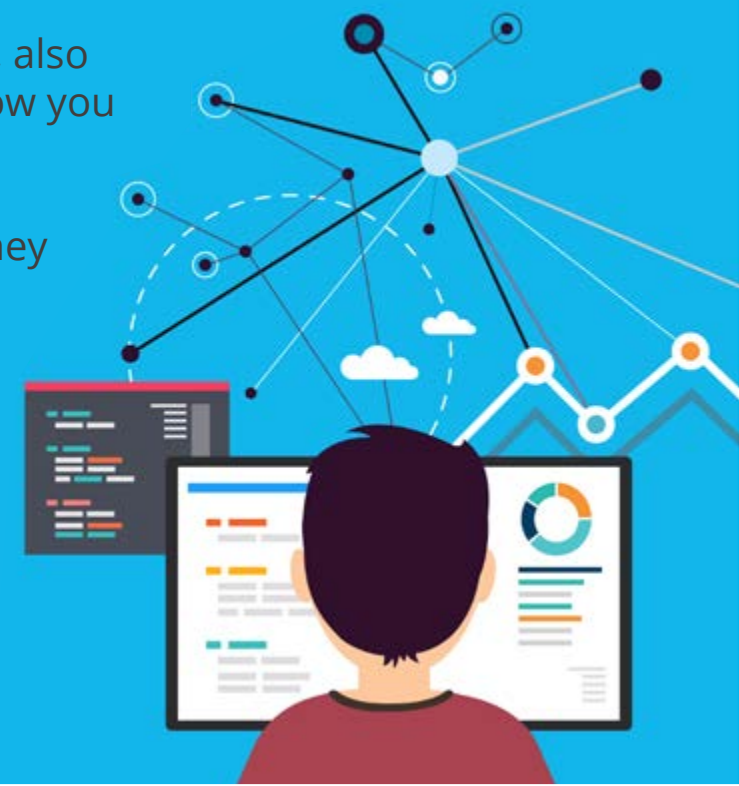
Under the GDPR, individuals have the following rights:

1. **The right to be informed** about the collection and use of their personal data
2. **The right of access** to their personal data
3. **The right to rectification** of incorrect or incomplete data records
4. **The right to erasure** of their personal data in some circumstances
5. **The right to restrict processing to storage**, in certain circumstances
6. **The right to data portability** – moving, copying or transferring across different services
7. **The right to object** to certain ways of processing of their personal data
8. **Rights in relation to automated decision making and profiling**

If an individual exercises their right to access information you hold on them, also known as a Subject Access Request, you must be able to prove when and how you gathered the information.

Every time one of our researchers contacts an influencer, the information they record is timestamped so we have a clear record of this process. This also applies when our clients add their own contacts or additional details to existing profiles.

Many of our clients also record meetings, facts or salient details about the contacts they work with, and Vuelio automatically records when these entries are made. If someone in the database makes a Subject Access Request, clients can prove when and how they recorded the personal information; they have an audit trail that supports the key GDPR requirement of 'accountability'.



OUR BASIS FOR PROCESSING



In compiling and maintaining the Vuelio Database, we process personal data belonging to a range of media and political influencers on a 'legitimate interest' basis.

Journalists and bloggers expect to be contacted by PRs – indeed, the data we gather often supports media influencers' commercial activities – while political influencers will expect to engage with public affairs professionals. We collect no special categories of personal data, nor any personal data of any influencers under the age of 18 (despite frequent requests from younger influencers to do so!).



Furthermore, we work with influencers to understand what they want from PRs and public affairs professionals in order to create listings that provide the most value to all concerned. Where influencers do not wish to be listed, we ensure that all influencers have a clear means to opt out.

We explain all this reasoning to the subjects whose data we're processing and let them know why we're gathering their data, who will use it and why. We also share our 'balance test' with them, which shows how we respect their rights as data subjects at all stages of Vuelio processing; in short, presenting our reasoning for processing data on a legitimate interest basis.

Only you can decide what your lawful basis for processing personal data is. Whatever you choose, you must understand it and you should document it.

**Everyone who processes
data needs to decide on
their own lawful basis for
processing data.**

No one can do this for you.

(Sorry)

TAKE RESPONSIBILITY



The GDPR requires companies to take responsibility for their own compliance, so responsibility cannot be shifted onto a third party.

As clients act as Data Controllers when they use Vuelio, they must have a clear lawful basis for processing the data in the platform (even our media or political data – by using the system you are the Controller of this data). Your lawful basis cannot be a ‘catch all’ for every different type of processing – you must have a specific basis for any processing you undertake. It can’t just exist in your head, it needs to be clearly written out and made available to every individual whose data you’re processing. It may be appropriate to write your lawful basis in a privacy policy on your website, which you then direct people towards.

This privacy policy must be clear about how you’re processing data and not part of more generic terms and conditions on your website.

For anyone whose data you’re processing (from journalists and bloggers to MPs and council leaders) you must:

- Ensure they fit in with your lawful basis
- Inform them that you are processing their data and direct them to your privacy policy
- Give them a clear means to opt out
- Repeat the process for new contacts, including any new members of media lists you’re building

Again, It’s worth repeating: if you’re processing someone’s personal data, you must inform them.



REMOVAL

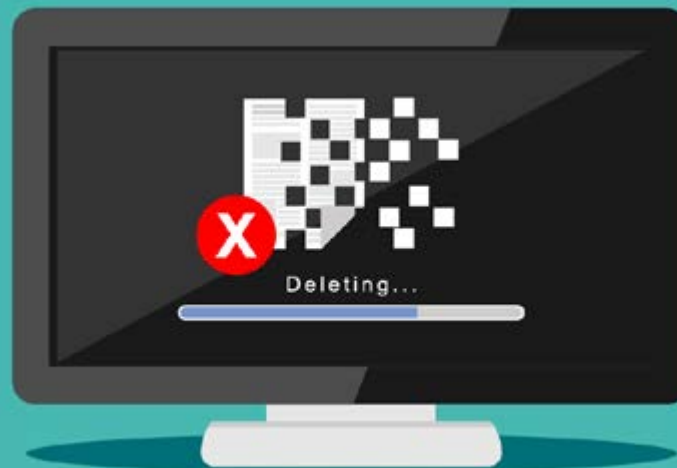


We take the greatest care to respect the rights and freedoms of influencers – so if someone no longer wishes to be listed, we have processes in place to ensure the complete deletion of their private data, in full compliance with the GDPR. This means our clients know that everyone in the database is happy to engage with relevant parties and wants to work with leading communications professionals.

If someone tells us they want to opt out, we respect that and remove their details.

The same applies when an influencer asks a customer to remove their details; they must be removed by the customer in order to comply with the GDPR. Vuelio users remove the individual's details from their own version of the database – in effect giving the influencers control over which databases they appear on.

Only if Vuelio receives a direct request for data deletion is someone removed from the Vuelio database entirely.



SUBJECT ACCESS REQUESTS



Under the GDPR, everyone has the right to request access to the data companies hold on them. That includes all influencers that you contact. If they request this information, you have 30 days to respond with every piece of personal data you hold on them. If you manage your stakeholder relations in Vuelio, and only Vuelio, then this process is quick and easy to manage.

If you ever export information or email from Outlook (or any other email platform), consider how easy it would be for you to gather all this information into one file to send to the individual. And it's not just your inbox – what about spreadsheets, email platforms, reports, PowerPoints, Word docs, attendee lists, notebooks, business cards and paperwork? What's more, it's not just you; the subject must have access to data from anyone in your company. It all must be reported to the individual within 30 days.

GDPR Manager is a new module from Vuelio, which allows users to manage their GDPR policy, record consent and add associated documentation – and, in addition, manage Subject Access Requests.

The Subject Access Request function gives you full control from the point the request is made – it allows you to assign tasks to team members, record every step of process, and gather and send the individual's personal data with secure encryption. It even includes a clock for each request, ensuring you work within the 30 day limit.

SECURITY



Keeping data secure and protecting it against breaches is a vital part of the GDPR. Vuelio takes the security of its systems very seriously, and has been trusted by leading organisations, including such as the Bank of England, Interpol and over 40 police forces, to keep their data safe and secure.

We have taken extensive measures and comply with recognised standards in order to protect the personal data we process.

Detailed information about our secure processes and procedures is recorded in our evidence pack, which is available on request.



Compliant comms software?

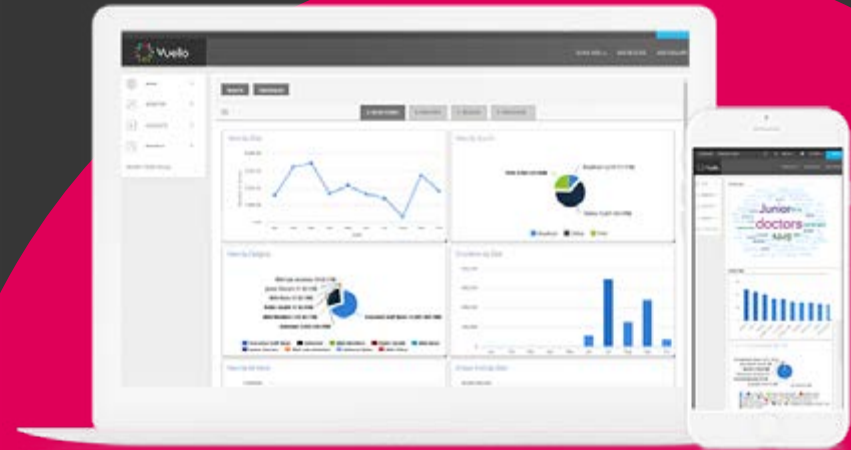
CONTROL YOUR COMMUNICATIONS WITH VUELIO

Make all your communications and data GDPR compliant with the Vuelio Integrated Communications Suite.

Log all your stakeholder interactions, access the world's largest media database, optimise press release distribution, monitor all your media, track parliament and political developments and measure your communications to understand the effectiveness of your campaigns, the strength of your brand, and the ROI of everything you do.

VUELIO INTEGRATED COMMS SOFTWARE ALLOWS YOU TO:

- Centralise all your engagements and stakeholder data to log, share and report stakeholder engagement activities, ensuring consistent communications that help maintain and improve crucial relationships and GDPR compliance
- Access the largest UK database of journalists, editors, bloggers and other media contacts, full of the information you need to succeed: names, numbers, profiles, pitching preferences, and pet hates - all in a GDPR compliant database
- Listen to what people are saying about your brand across millions of social, broadcast, print and online sources and track all of those conversations in one place



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