

# Interim Privacy Notice

## Who We Are

**KBH On-Train Media Limited** (“KBH”) (*‘we’ or ‘us’ or ‘our’*) gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

KBH’s registered office is at **Union House, 182-194 Union Street, London SE1 0LH** and we are a company registered in England and Wales under company number **03532474**. We are registered on the Information Commissioner's Office Register, registration number **Z871294X**, and act as the **data controller** when processing your data. Our designated Data Protection Officers/Appointed Persons are Jessica Garthwaite and Fiona Holland, who can be contacted at [dpo@kbhontrainmedia.co.uk](mailto:dpo@kbhontrainmedia.co.uk).

## Information That We Collect

KBH processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

### ***The personal data that we collect is: -***

- Name
- Personal Email
- Business Email
- Business Telephone Number
- Mobile Telephone Number

### ***We collect information in the following ways: -***

Visits to KBH website  
Employment CVs  
People who contact KBH via social media, email or phone

## How We Use Your Personal Data (Legal Basis for Processing)

KBH takes your privacy very seriously and will never disclose, share or sell your data without your consent, unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time. ***The purposes and reasons for processing your personal data are detailed below: -***

- We collect your personal data in the performance of a contract or to provide a service and to ensure that orders are completed and can be sent out to your preferred address

- We collect your personal data regarding previous employment, education, referees and answers to questions relevant to the role applied for as part of the recruitment process
- We collect and store your personal data as part of our legal obligation for business accounting and tax purposes
- We will occasionally send you marketing information where we have assessed that it is beneficial to you as a customer and in our interests. Such information will be non-intrusive and is processed on the grounds of legitimate interests.

## **Your Rights**

You have the right to access any personal information that KBH processes about you and to request information about: -

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has been/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or to complete the information and we will strive to do so as quickly as possible, unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing (*where applicable*) in accordance with the data protection laws, as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

## **Sharing and Disclosing Your Personal Information**

KBH may share your personal information with selected third parties for the purposes of providing our services and business functions; however, all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures. For a current list of those third parties with whom KBH shares this information, please contact us at [dpo@kbontrainmedia.co.uk](mailto:dpo@kbontrainmedia.co.uk).

## **Safeguarding Measures**

KBH takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, **including:**

- **SSL (Secure Socket Layer)**
- **TLS (Transport Layer Security)**
- **Data Encryptions**
- **Pseudonymisation**
- **Restricted Access (Access Control Lists)**
- **Complex IT Authentication**
- **Firewalls**
- **Anti-Virus**
- **Anti-Malware**
- **Intrusion Detection Services.**

### **Consequences of Not Providing Your Data**

Whilst you are not obliged to provide your personal information to KBH, as this information is required for us to provide you with our services; we will not be able to offer some/all our services without it.

### **Legitimate Interests**

As noted in the '*How We Use Your Personal Data*' section of this notice, we occasionally process your personal information under the legitimate interests legal basis. Where this is the case, we have carried out a thorough Legitimate Interests Assessment (LIA) to ensure that we have weighed your interests and any risk posed to you against our own interests, ensuring that they are proportionate and appropriate.

We use the Legitimate Interests legal basis for processing personal data and have identified that our interests are the four categories outlined on end p1 / start p2 of this notice.

### **How Long We Keep Your Data**

KBH only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We are required under UK tax law to keep your basic personal data (*name, address, contact details*) for a minimum of 6 years after which time it will be destroyed.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

### **Lodging A Complaint**

KBH only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

**Organisation:**

**Jessica Garthwaite  
KBH On-Train Media  
Union House  
182-194 Union Street  
London  
SE1 0LH  
T: 020 7207 5333  
e-mail: [dpo@kbontrainmedia.co.uk](mailto:dpo@kbontrainmedia.co.uk)**

**Supervisory authority:**

**Information Commissioner's Office (ICO)  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
T: 0303 123 1113  
e-mail: [casework@ico.org.uk](mailto:casework@ico.org.uk)**