

PRIVACY POLICY MEDIADDRESS

This Privacy Policy describes the procedures of Mediaddress (hereinafter referred as “**Us**”) on the collection and processing of Journalists’ personal data and it is granted pursuant to art.14 of the Regulation EU 2016/679 (“**GDPR**”). The term “Journalists” means practitioners in the field of information, journalists, publishers, editorial staff, bloggers, commentators on social media and everyone who works in the media sector.

Mediaddress Limited, with registered office in 15 Northfields Prospect SW18 1PE Northfields London, UK, is the data controller in connection with the purposes offered through MEDIADDRESS (www.mediaddress.it) (“**Data Controller**”).

MEDIADDRESS is a database containing media and professional contacts of european journalists.

The database was established more than 26 years ago and it had, over the years, more than 3.000 subscribers press offices and more than 6.000 registered journalists.

MEDIADDRESS offers high safety standards and it ensures the respect of the principles of transparency, fairness, proportionality and accountability provided for by the GDPR through implemented technical and organisational measures.

Our practices are subjected to ongoing controls in terms of certification UNI EN ISO 9001:2015.

MEDIADDRESS has been set up in order to put in contact the journalists with the press offices making the flow of information among them more targeted.

1. Personal Data

Journalists’ personal data which are processed are common data (name and surname, name of the editorial staff, the role played by the journalist in the editorial staff, the journalists’ areas of expertise/interest, latest press reports, journalist’s professional email address and telephone number, social media addresses) (“**Journalists’ Data**”).

Data which are not relevant and strictly necessary in relation to the following purposes are not collected. For example, personal data which do not fall within professional field (such as mobile phone number, private email or other contacts) are not processed, except where the data are voluntarily provided by the journalist through the registration in the Journalists’ Area.

Data which fall within the special categories listed in art. 9, co. 1 of the GDPR are not going to be collected.

2. Purpose of processing

We collect and use the Journalists' Data in accordance to the GDPR if there is the legitimate interest to provide goods and services to third parties.

Journalists' Data will be processed only for purposes related to journalistic activity and to the press as a whole.

We process only data which are strictly necessary in order to provide our services and only in relation to the purposes which are compatible with the ones for which the Journalists' Data was collected, received or for which consent was given.

Our Users (as defined in paragraph 4 (*Recipients*)) use the Journalists' Data included in our products and services in order to find the most suitable journalists with whom establish a dialogue and manage the reputation of their company through the publication of their press releases, announcements, product launches, or content which are relevant to the community and the market when such communications are from the institutions and of the Public Administration.

In particular the Journalists' Data will be processed for the following purposes:

- to create, storage and update a Journalist record;
- to provide our services, including: consultation by Users, creation and export of reports showing lists of results that meet the search criteria entered by the User, sending press releases from Users;
- to meet the Journalists' requests regarding products and services devoted to them;

The updates are made according to an automatic schedule through (i) regular request to the editorial staff for confirmation of the Data, (ii) on the basis of the news indicated in the national and international press review subject to confirmation by the editorial staff or (iii) directly on report by the editorial staff or Journalists.

Such measures allow us to safeguard the quality of the Data and to ensure, at the same time, its accuracy and updating.

3. Data source and legal basis of data processing

The Data can be provided directly by the Journalist or by the editorial staff with which the Journalist cooperates.

The legal basis consists of the legitimate interest pursued by the editorial staff to use a feed optimization service for press releases and the legitimate interest pursued by the Data Controller to provide a service which meets market requirements. The service that MEDIADDRESS provides also meets the interest of the community to receive a complete and accurate information, as well as to the Users' interest in promptly identifying the most appropriate Journalist and the press for the publication of their press release.

In accordance with the GDPR, the Data Controller carried out a legitimate interest assessment and a privacy impact assessment considering, among other factors, the professional nature of the Journalists' Data, the use closely linked to journalistic activity and the benefits in terms of precision of the data and control over them by the Journalists.

4. Recipients

The Journalists' Data may be shared only in the ways described in this privacy policy or otherwise required by applicable laws.

We share the Journalists' Data with our Users when providing our products and services ensuring that their access is safe and for a limited time.

Journalists' Data may be shared, for the purposes set out in art. 3 of this Privacy Policy, with:

- a) press offices of private companies, Public Administration, independent national Authorities;
- b) information companies, belonging to the Mediadata and non-Mediadata group, which provide services to editorial offices and press offices in Italy and other countries of the European Union similar to those of MEDIADDRESS (the categories of recipients listed in letters a) and b) are defined "**Users**");
- c) persons authorized by the Data Controller, pursuant to art. 29 of the GDPR, to process the Journalists' Data necessary to carry out activities strictly related to the provision of our products and services, who are committed to respect confidentiality or have an appropriate legal confidentiality obligation;

- d) any person that typically act as data processor pursuant to art. 28 of the GDPR, namely: (i) individuals, companies or professional firms that provide assistance and advice to the Data Controller on accounting, administrative, legal, tax and financial matters; (ii) subjects delegated to carry out technical maintenance activities;
- e) individuals, entities or authorities who require the communication of Journalists' Data as mandated by law or by order of the authorities;
- f) other third parties, subject to the Journalists' consent.

These subjects are thereafter collectively defined as “**Recipients**”.

In the contractual relations with the Recipients, the Data Controller implements appropriate technical and organisational measures to ensure that the Journalists' Data are processed by the Recipients exclusively for the purposes described above and in accordance with the GDPR.

5. Data retention period

The Journalists' Data are kept for the period strictly necessary to achieve the purposes described above.

Such retention period is determined considering the following criteria: (i) data accuracy; (ii) frequency of the publication, and (iii) the possible termination of the journalistic activity.

6. Right to object

Given the fact that the processing of Journalists' Data is based on the existence of a specific legitimate interest, the Data subject has the right to object at any time, for any reason, to the processing of personal data by written communication to be sent to [\[privacy@mediaddress.co.uk\]](mailto:privacy@mediaddress.co.uk)

7. Other rights of the Data subject

The data subject also has the right to obtain from the Data Controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data, the right to know the categories of personal data concerned, the right to obtain from the Controller the rectification of inaccurate personal data concerning him or her and the right to obtain from the Controller the erasure of personal data concerning him or her in the cases provided for by the art. 17 of the GDPR, the transformation into an anonymous form or the right to obtain from the Controller restriction of processing data concerning him, as well as the right to receive the personal

Mediaddress _____

Media contact

data concerning him or her, which he or she has provided to a Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided in the cases provided for by art. 20 of the GDPR.

In any case, the Data subject has the right to lodge a complaint with the Data Protection Authority if he believes that the processing of his or her data is contrary to the GDPR.

8. Contacts

The Data Controller may be contacted at any time at the above-mentioned email address or at the email address [privacy@mediaddress.co.uk] for the exercise of the rights referred to in paragraph above or for any question regarding the processing of Journalists' Data.