

Privacy Policy for data protection

This page governs the manner and outlines our policy by which CW PUBLISHING GROUP LIMITED collects, uses, maintains and discloses information collected from users / subscribers (each, a “User”) of the www.cwpg.com website (“Site”). This applies to the Site, manual subscriptions and all products and services offered by CW PUBLISHING GROUP LIMITED. By opting in you are confirming you are above the age of 18, the data you have provided is accurate and that you consent to be contacted.

We may collect personal identification information from Users in a variety of ways, including, but not limited to, manual sign up forms, when Users visit our site, register on the site and in connection with other activities, services, features or resources we make available on our Site. Inaccurate information may result in details being disclosed unintentionally, for which you accept full liability.

Users may, however, visit our Site anonymously.

We may collect non-personal identification information about Users whenever they interact with our Site. Non-personal identification information may include the browser name, the type of computer and technical information about Users means of connection to our Site, such as the operating system and the Internet service providers utilized and other similar information.

We will collect personal identification information from Users only if they voluntarily submit such information to us, fully aware of what our intention is and how we intend to use it in line with GDPR. Users can always refuse to supply personally identification information, except that it may prevent them from engaging in certain Site related activities and subscription offers and promotions. When subscribing to our publications, the publication is your primary interest and CW PUBLISHING GROUP LIMITED, acting as sole controller, will ensure only relevant communications are sent to you in line with the theme of your chosen publication; 3rd parties that you may also opt in to receiving communications from at the time of subscribing, will need all communications approved by CW PUBLISHING GROUP LIMITED prior to sending, relinquishing any control over the purpose and means of communicating with our subscribers.

CW PUBLISHING GROUP LIMITED uses incentives to collect and process Users, personal information legally based on **consent** and legitimate interest for subscriptions to our publications for the following purposes:

To improve our Site – We continually strive to improve our website offerings based on the information and feedback we receive from you. To send periodic emails – With publications and marketing communications relevant to your subscription, providing information from CW PUBLISHING GROUP LIMITED its partners, information sources and contributors.

It may also be used to respond to their inquiries, and/or other requests or questions. We also reserve the right for Users to receive emails that may include company news, updates, related products and new subscriptions they may be interested in or third party service information, etc. If at any time the User would like to unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each email or User may contact us via our Site.

We may from time to time supply an individual's information to third parties when they have actively opted to receive information by specifically giving us permission to share with them once we have made them aware of who they will be according to the company name by which they identified themselves on the

agreement with us . The main purpose for this is to allow the specifically stated third parties to provide you with information about goods and services which said third party deem to be of interest to you. Such information may be provided by marketing communications or advertising which is tailored to your interests. Your data may also be used in the way described below. Be assured that any third parties will only be allowed to use your data in accordance with GDPR and the Data Protection Act 2018 and other applicable law relating to privacy, a list of third parties who may contact you is again available upon request.

Those **third parties** (specifically available upon request) who would wish to send you marketing communications will usually fall into the example sectors shown below, as they are relevant to the market CW PUBLISHING GROUP LIMITED operate within. We do of course, have a host of specialist contributors whowould fall into niche, sub categories, but again, all 3rd parties will be available upon request.

Sector Description and examples

- Retail
- Advertising
- General stores
- Automotive (including dealerships and accessories)
- Property
- Home furnishings
- Home improvement
- Fashion and clothing(adults/kids)
- Baby/Toddler care
- Telecoms and utilities
- Finance
- Pensions
- Loans, credit cards and mortgages
- Investments & savings
- Insurance
- Home
- Car
- Travel
- Pet
- Personal

- Other insurances
- Travel
- Holidays
- Hotel
- Airlines
- Travel booking
- Lifestyle
- Health & Well-being
- Beauty & Grooming products
- Fitness
- Charities
- Media & publishing companies
- Leisure
- Recruitment
- Gaming
- Legal Services
- Educational institutions

DPA (date processing agreement) for third party processors

In the interest of, and to demonstrate our commitment to GDPR and DPA 2018, we adopt appropriate data collection (subscription data is collected primarily via manual paper forms), storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of personal information, username, password, transaction information and data stored on our Site. Any of our subscription data shared, is the sole property of CW PUBLISHING GROUP LIMITED and the processor will be granted download and usage access for a limited period only, that being the 6 months of the relevant publication term. All the data applicable to the campaign will be disclosed shortly after publication, via our stated method of transfer, with no exception.

CW PUBLISHING GROUP LIMITED collects data for the purpose of adding to our subscription base, we own the data and are the data controller with regard to any usage, internal or external and we will dictate the means of communication for each product/publication.

Third party processors will process the data on our behalf, according to our DPA, strictly under our guidance. Your ability to communicate with our subjects, will ultimately be to add value to our subscriptions, you will of course, also have the benefit of promoting your products/services to the data we have allowed access.

For **data sharing** purposes CW PUBLISHING GROUP LIMITED remains the data controller for information it has collected and disclosed to third parties (data processors) stipulated strictly by the name on our agreement, unless specified otherwise in writing, throughout the term of the agreement within which time we would recommend you contact the audience no more than once a quarter and upon expiry of the 6 month data license all processors must ensure to securely delete the shared data from their network, save for data subjects they can prove have actively opted to receive additional / continued communication from them, in writing or positive reaction (classified as warm leads). If your agreement is renewed we will reissue you with a new license allowing you continued use of our data disclosed to you for another term, based entirely on our privacy policy/DPA with CW GROUP LIMITED as sole controller. Processors of our data must adhere to CW PUBLISHING GROUP LIMITED terms and conditions from the moment our agreement is confirmed/data is downloaded and these will supersede all other personal practices internal or otherwise.

CW PUBLISHING GROUP LIMITED warrants and undertakes that it will ensure that the Shared Personal Data is accurate, in line with GDPR processing regulations and DPA 2018, signing of the agreement confirms our processors accept this.

The data will be for marketing communications relevant to the publication within which you have contributed and will contain details of subjects who have opted-in to receive communications from you by name, the data fields included, again, will be applicable to the publication, but in most cases include name, email address and Title. Any communication must adhere to the approval guidelines of the publication you have contributed to. CW PUBLISHING GROUP LIMITED retains the right to view and approve any communications our processors intend to send, prior to sending, if necessary we will request reasonable changes to be made; we alone dictate the purpose and means of the the communications, and are fully in control of the content you wish to send, processors fully accept they relinquish any controller rights. As controllers we may retain fields for our own purpose and will not disclose to processors. Once data is received processors of the information immediately are bound to CW PUBLISHING GROUP LIMITED's data sharing policy and collection processes, by downloading the data you are committing to having the ability to use the data and ensure that it will be kept in storage on a managed IT network with the required security level and protocols. Any third party data processors that fail to comply with the rules outlined here will be in breach of contract. Any communications made with subjects can only reference CW PUBLISHING GROUP LIMITED and the title of the initiative/publication within which you are featured, under no circumstances are our editorial partners to be mentioned on email communications.

As controllers we regularly conduct audits, which includes where applicable suppression of files against MPS and TPS, cleansing of any de-dupes and removal or redundant entries prior to disclosure. At times records may become redundant without our knowledge and if you believe this to be the case please inform CW PUBLISHING GROUP LIMITED immediately of those exact records and we will look into the matter, replacing only when CW PUBLISHING GROUP LIMITED agrees a record has become redundant, this also applies to any records that have been duplicated and sent to you. Data processors do not need to inform us of unsubscribes from their own communications, as this does not constitute unsubscribing from the publication and removal from our central base. If a subject unsubscribes from your own communications you must delete their record from your network immediately. If a subscriber contacts CW PUBLISHING GROUP LIMITED to unsubscribe and opt-out of receiving further information from us and our contributors/processors, we will remove the record from our data base and instruct you to do the same, which must be actioned within 24 hours of receiving notification.

The Data Recipient warrants and undertakes that it will not disclose or transfer Shared Personal Data to any third parties outside its organisation either within or outside the European Economic Area (EEA), unless agreed in writing with CW PUBLISHING GROUP LIMITED. All correspondence regarding data must be in writing to ensure it correctly logged.

The Data Recipient warrants it will process the Shared Personal Data in compliance with all applicable laws, enactments, regulations, orders, standards and other similar instruments that apply to its personal data processing operations.

The Data Recipient warrants it will process data breaches, complaints and subject access requests in line with GDPR requirements and that it will inform CW PUBLISHING GROUP LIMITED by contacting datateam@cwpg.com within 1 business day (that being a Monday – Friday), submitting all data subject(s) information, so that CW PUBLISHING GROUP LIMITED can reach an amicable resolution directly with an aforementioned subject(s) if so required. Only CW PUBLISHING GROUP LIMITED has the authority to process subject access requests (SAR) and have cite of the subjects subscription consent; as processors you do not have access and will not be granted it.

CW PUBLISHING GROUP LIMITED upon receipt of a request or complaint from a data subject, processor or the ICO will contact the data subject directly and confirm the nature of the issue, when and where consent was received and determine an amicable resolution, communicating the conclusion to all relevant parties. Data processors will have no involvement here, and not have cite of any consent evidence or correspondence; this is purely for the data controller, that being CW PUBLISHING GROUP LIMITED.

CW PUBLISHING GROUP LIMITED as data controller will inform all relevant parties of any changes to the dataset it has shared. The data recipient does not need to inform CW PUBLISHING GROUP LIMITED of changes to its own dataset.

Sensitive and private data exchange between the Site/CW PUBLISHING GROUP LIMITED and its Users/Processors happens over a TSL secured communication channel, encrypted and protected with digital signatures and malware scanning, our information security framework is managed by our ISO27001 accredited team, with information safely stored employing AES-256. By signing our contract processors accept this is adequate for the purpose of fulfilling the agreement and supersedes any of their own practices or requirements. If our processors choose not to download the data shared, that is their choice and has no bearing on the fulfilment of the agreement. If processors have a preferred method of transfer, it must be inline with current regulations and it is the responsibility of the processor to arrange for CW PUBLISHING GROUP LIMITED to upload the data, via their preferred method, with no restriction or inconvenience to CW PUBLISHING GROUP LIMITED's data practices.

Users may find content on our Site that link to the sites and services of our partners, suppliers, advertisers, sponsors, licensors and other third parties. We do not control the content or links that appear on these sites and are not responsible for the practices employed by websites linked to or from our Site. In addition, these sites or services, including their content and links, may be constantly changing. These sites and services may have their own privacy policies and customer service policies. Browsing and interaction on any other website, including websites which have a link to our Site, is subject to that website's own terms and policies.

CW PUBLISHING GROUP LIMITED has the discretion to update this policy at any time. When we do, we revise the update date at the bottom of this page. We encourage Users to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to fully understand this privacy policy and where possible periodically check and become aware of modifications, however, CW PUBLISHING GROUP LIMITED assumes the responsibility of contacting you directly should the policy change significantly to have a consequence on you.

By using this Site, you signify your acceptance of this policy and terms of service. If you do not agree to this policy, please do not use our Site. Your continued use of the Site following the posting of changes to this policy will be deemed your acceptance of those changes.

If you have any questions about this policy, the practices of this site, or your dealings with this site, please

[contact us](#)

If you have registered on our site and wish to access the data we hold about you and / or have it deleted please email your request to datateam@cwpg.com

Last Edited September 2018

[Terms of Service](#)
[Privacy Policy and DPA](#)
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