

Agility Fairs & Events GDPR Policy

What is it?

The **General Data Protection Regulation** (EU) 2016/679 ("GDPR") is a regulation in EU law on data protection and privacy for all individuals within the European Union (EU) and the European Economic Area (EEA). It also addresses the export of personal data outside the EU and EEA areas.

GDPR aims primarily to give control to individuals over their personal data.

It introduces various new terms regarding the processing of data including "data controller", "data processor", "opting in" & "opting out" of communications.

Why is it important?

The regulation incorporates large fines for companies in breach of the new law.

The F&E speciality, in comparison to other Agility entities, process relatively large volumes of personal data. This is generally through exhibitor lists, websites and company databases.

It is important to all Agility F&E offices as they may process personal details of EU individuals. Please note that there is no requirement to change data processing activities related to **non EU individuals** – you can continue to process as previously.

Agility

Following an internal audit process and to comply with GDPR, Agility introduced a Privacy Policy / Statement on 17th July 2018. (The related Connections article can be found [here](#).)

This is a global policy however local countries may create their own policy to work in conjunction with the global policy. You should check if an additional local policy has been created with GIL country management.

Following the launch of the global Privacy Statement, the F&E Management Board are now distributing additional guidance to assist the global teams when processing, sharing and storing information.

This guidance will be reviewed on a regular basis and further updates may be introduced.

Data / Exhibitor List received from an Organiser

It is likely that an organizer will specify how data they share with Agility can be used / processed. The processing requirements must be adhered to and managed on a show by show basis.

- To comply with GDPR, an Organiser should be liaising with their exhibitors to ascertain if the data can be shared with contractors (such as Agility) for the purpose of selling services
- If no specific instructions have been advised then you should provide a copy of [Agility's Privacy Statement](#) and confirm to the Organiser how we process / manage data provided
- An Organiser may serve Agility with their own GDPR policy / addendum / instructions when providing an exhibitor list / signing a contract with Agility. Any such documents should be reviewed and adhered to. As a data controller, the Organiser's requirements will take precedence over Agility's standard (minimum standards) practice. Should you need any clarification on how you should proceed please contact the F&E Management Board

Data / Exhibitor List received from an Agent / other Agility Office

- Clarify the data source, in writing, for any received data (is it "official" via an Organiser or "non-official" obtained from other sources?)
- Organiser sourced data - the "data supplier" should advise / have advised any specific requirements. Process in line with the stated requirements
- Web or similar public resource data (i.e. show specific website with online exhibitor list) – We can use the data, however, you should request details on the source and check legitimacy
- Any data sourced from "old" lists should be processed with care.

IMPORTANT NOTE – the Regulation does not state a "specific legal timeframe" data can be stored, however, the F&E Management Board have deemed data from "the immediate past event" can still be used unless otherwise stated by the data supplier. You should consider the use of this type of data carefully and on a case by case basis.

Sharing Data

Great care must be taken when considering sharing data on EU individuals and it should only be done if the data is approved for sharing. An Organiser / "data controller" may determine that data cannot be shared.

- Data on EU individuals can only be shared with other Agility offices / approved agents if approval has been received (In general we will assume approval is given by the Organiser to share the lists if they have been given to us, unless otherwise specified).
- Before sharing data on EU individuals with external agents (non-Agility offices) you must ensure the agent has agreed to Agility Minimum Standards (if an EU agent then they will also need to provide their own GDPR policy etc.). As Agility offices have some common agents you can check with F&E Management Board for any existing agreements.

Contact with exhibitors (mailshots etc.)

A guidance template has been produced to assist as addendum to this document (see links). The key points below must be included / noted in any communication -

- State the reason you are contacting the exhibitor (in relation to which show / event)
- Provide an “opt out” relating to that specific show / event
- Advise that the Agility Privacy Statement is available on request
- Consider content and minimise volume of mails (good operating practice)

Data deletion programme

A key element of GDPR is that the individual has rights regarding the use and storage of their personal data. If they request details on what data Agility hold, that we no longer contact or fully delete their data then we must action immediately.

- Opt Out – On receipt of a request to “opt out” / “unsubscribe” you should record the details in a secure file and share the details with the relevant parties. Requests should be actioned and adhered to
- Full deletion – Should an individual request full data deletion please contact the F&E Management Board immediately for further advice and instruction
- “Data controller” requirements – Organisers or other agents may specify the length of time data can be held before deletion. These terms must be adhered to without fail
- If not specified elsewhere (via “data controller” / Organiser requirements), Agility requires that we only retain related general exhibitor data / exhibitor list data for no longer than the past previous event.

Agility Minimum Standards / Requirements

Agility have created “Minimum Standards” for both our own communications and also what our expectations are regarding other Agility offices / external agents. These requirements should be reiterated when sending any lists / leads to agents.

Specific Organiser requirements may be more stringent and should take priority.

- Any data provided by Agility should be deleted no more than 6 months after the show close
- The data provided can only be used for the purpose of providing joint services to the specific show in question
- Sales e-mails must be kept to a minimum (do not repeatedly mail the customer)
- All sales communication must provide the customer with an opportunity to “opt out” of further communications on that event. Any requests to opt out (or delete) must be actioned and shared with the office supplying the initial data

Other notes

- Agility Offices / An agent has the right to retain personal data they collect themselves. If the exhibitor contracts directly with them for services then the agent / Agility office in question becomes a “data controller” for the data they hold.
- New agents (EU or non EU) – on provision of leads etc. you must ensure that the necessary steps regarding the Agility Privacy Statement / “Minimum Standards” etc. are followed.
- Use this guidance document to assist in your reply if you receive a request for Agility’s Privacy Statement / details of our processes etc.
- Share any details with the F&E Management Board to ensure Agility hold a central repository for reference.

Document Template Links

The following are document templates that have been created with key GDPR information included where you can adapt for your use.

- [Response template](#) for receiving lists containing details of EU.
- [Template to agents](#) stating Minimum Standards / requirements in advance of sharing data on EU individuals (to be sent only once immediately and thereafter annually as review process).
- [Sample Sales Letter](#) including “Unsubscribe”.