



## Introduction

At GROW Radio ("we", "us", or "our"), we are committed to protecting the privacy and security of the personal data we collect and process. This General Data Protection Regulation (GDPR) Policy outlines our approach to ensuring compliance with the GDPR, which is a European Union (EU) regulation that enhances the protection of personal data for EU residents.

Please note that this GDPR Policy should be read in conjunction with our Privacy Policy and Data Protection Policy, which provide further details on our data protection practices.

## Scope

This GDPR Policy applies to all personal data we process about EU residents, regardless of whether the processing takes place within or outside the EU. It covers our employees, contributors, suppliers, contractors, and users of our radio station broadcasts, podcasts, website, mobile application, and any other services we may provide (collectively, the "Services").

## Data Protection Principles

In accordance with the GDPR, we adhere to the following data protection principles when processing personal data:

- **Lawfulness, fairness, and transparency:** We process personal data lawfully, fairly, and transparently, providing clear information about our data processing activities to data subjects.
- **Purpose limitation:** We collect personal data for specified, explicit, and legitimate purposes, and we do not process it in a way that is incompatible with those purposes.
- **Data minimisation:** We only collect and process personal data that is adequate, relevant, and limited to what is necessary for the purposes for which it is processed.
- **Accuracy:** We take reasonable steps to ensure that personal data is accurate and, where necessary, kept up to date. We also provide

mechanisms for data subjects to request the correction or updating of their personal data.

- Storage limitation: We retain personal data only for as long as necessary for the purposes for which it was collected, and we delete or anonymise personal data when it is no longer needed.
- Integrity and confidentiality: We implement appropriate technical and organisational measures to ensure the security of personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage.

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### **Data Subject Rights**

We respect and uphold the rights of data subjects under the GDPR, including:

- The right to be informed: We provide clear, transparent, and easily understandable information about how we process personal data.
- The right of access: Data subjects have the right to access their personal data and obtain information about how it is being processed.
- The right to rectification: Data subjects have the right to request the correction or updating of their personal data if it is inaccurate or incomplete.
- The right to erasure (the "right to be forgotten"): Data subjects have the right to request the deletion of their personal data in certain circumstances.
- The right to restrict processing: Data subjects have the right to request the restriction of the processing of their personal data in certain circumstances.
- The right to data portability: Data subjects have the right to receive their personal data in a structured, commonly used, and machine-readable format, and to transmit it to another controller without hindrance.
- The right to object: Data subjects have the right to object to the processing of their personal data in certain circumstances, including for direct marketing purposes.
- The right not to be subject to automated decision-making, including profiling: Data subjects have the right not to be subject to decisions based solely on automated processing, including profiling, that have legal or similarly significant effects on them.

## **Data Protection Officer**

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing our GDPR compliance efforts and serving as a point of contact for data subjects and supervisory authorities. The DPO can be contacted at [gary@growradio.uk](mailto:gary@growradio.uk)

## **Data Breach Notification**

In the event of a personal data breach that is likely to result in a high risk to the rights and freedoms of data subjects, we will notify the affected data subjects and the relevant supervisory authority without undue delay, and in any case within 72 hours of becoming aware of the breach.

## **International Data Transfers**

When transferring personal data outside the European Economic Area (EEA), we ensure that appropriate safeguards are in place to protect the data, such as entering into Standard Contractual Clauses with data recipients or ensuring that data recipients are certified under the EU-US Privacy Shield.

## **Changes to This GDPR Policy**

We may update this GDPR Policy from time to time to reflect changes in our practices, industry standards, or legal requirements. When we make changes, we will update the effective date at the top of this document, and we encourage you to review the policy periodically to stay informed about our GDPR commitments.

## **Contact Us**

If you have any questions, concerns, or comments about this GDPR Policy, our data protection practices, or your rights as a data subject, please contact our Data Protection Officer (DPO) at:

GROW Radio  
Attn: Data Protection Officer  
7 Chapman Court  
Bridge Street  
Warwick  
CV34 5DP  
England  
Email: [gary@growradio.uk](mailto:gary@growradio.uk)  
Phone: 07866602507

We are committed to working with you to resolve any concerns or complaints you may have about our data protection practices. If you are not satisfied with our response, you may have the right to lodge a complaint with your local supervisory authority.