

Mention Me GDPR Update

All you need to know about Mention Me and GDPR

April 2018

The GDPR commencement date is nearly upon us. In our final update we've put together an overview of all the GDPR steps we've taken and also provided some useful information which you can use as a reference in the future.

Background

This update is the last in a series of communications we've sent to you in order to keep you informed as to our GDPR compliance journey. In this update you'll find:

- A summary of the data we process on your behalf and the purposes for which we process it
- An overview of the steps we've taken to make our platform GDPR-compliant
- Details of where and how your data is stored and the technical and organizational measures we deploy to secure it
- Outlines of the procedures you should follow with regard to subject access requests, unsubscribe requests and right to be forgotten requests
- Information on Mention Me's approach to data retention periods
- Contact details of our Data Protection Officer
- A link to our GDPR-compliant Data Processing Agreement

Questions?

If you have specific questions please get in touch.

gdpr@mention-me.com



Data processing summary

What data does Mention Me process?

We believe it is important to be fully transparent about the data Mention Me processes on behalf of clients. We would like you to understand why we need to process this data in order to deliver our refer-a-friend services.

Not all clients have the same set up or integration with our platform, but we have created the table below which explains the data we process for our default (and most common) integration.

DATA COLLECTED	HOW & WHEN	PURPOSE
Historic customers: <ul style="list-style-type: none">Email addresses	Email addresses are sent by you via secure file transfer during set-up. We can keep them in hashed format.	<ol style="list-style-type: none">Referees are checked against your existing customer list to ensure they are genuine new customers.Historic customers can be enrolled to your refer-a-friend programme to enable immediate name sharing
Customer in your checkout: <ul style="list-style-type: none">Email addressFirstname and surnameOrder detailsIP Address/Cookie	Data is collected via javascript tag placed on your order confirmation page.	<ol style="list-style-type: none">We check new customers against our list of potential Referees to confirm the referral purchase.To facilitate customer registration.To prevent self-referral or gaming.To maintain the list of existing customers.For reporting and invoicing.
Referrer: <ul style="list-style-type: none">Email addressFirstname and surnameIP Address/Cookie	Entered by the Referrer on our registration page if they are sent to the page with no other information provided by you.	<ol style="list-style-type: none">To register in the programme and enable sharing.To email rewards when due.
Referee: <ul style="list-style-type: none">Email addressIP Address/Cookie	A Referee enters their details after following a sharing link	<ol style="list-style-type: none">Referee data is checked against the post-purchase tag feed to identify when a new purchase has been made.To email rewards when dueYou can choose to ask referees to opt in to your communications and if so, we will provide this data to you.

What data does Mention Me process? (cont.)

- We only process data needed for your refer-a-friend programme
- We do not use your data for any other purpose
- We request the minimum data necessary
- We only do the minimum processing necessary to run the programme
- We carefully record data collection and storage
- We only send emails to customers who have actively engaged with refer-a-friend
- We only send emails which are essential (e.g. Reward or Registration emails)
- We do not process sensitive personal data

What changes have Mention Me made in light of GDPR?

These are the principal changes we have made to our platform and our processes with GDPR and privacy in mind:

- We no longer send emails on behalf of referrers. Instead, our platform opens the referrers own email client and they send referral emails directly. This means we don't process the email address of referees until they voluntarily provide it to us
- We have introduced fair processing notices to our user journey for referrers and referees
- We have updated our privacy policy in line with GDPR requirements. Our privacy policy can be viewed [here](#)
- We have introduced privacy settings for the emails we send (e.g. Reward and Registration emails). This enables referrers and referees to unsubscribe from these emails if they wish
- We will still collect direct marketing consents from referred friends for you if you wish, but you can no longer select for the opt-in to be ticked by default
- We have updated our systems to make it easier to systematically locate the data we hold on a particular customer upon request
- Once located, we can (as applicable) delete, suppress or export that data depending on the nature of the request

Questions?

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gdp@mention-me.com



Where does Mention Me store your data?

The data you share with us, as well as any data we collect and store on your behalf, is stored in the Mention Me Platform.

The Mention Me Platform is hosted in a data centre operated by Amazon Web Services (AWS) which is located in Ireland (within the EEA). AWS provide purely infrastructure hosting to Mention-Me.

How is data kept secure at Mention Me?

Mention Me takes data security very seriously. We are ISO27001 certified and we have a robust set of technical and organizational measures which we apply to the data we hold on your behalf.

You can view our [technical and organizational measures here](#) and these are also incorporated into our tailored GDPR-compliant Data Processing Agreement.

Does Mention Me use sub-processors?

Mention Me uses two sub-processors in connection with the services it provides to you. We have GDPR-compliant Data Processing Agreements in place with each of our sub-processors.

Entity	Function	Location	Privacy Notices and Data Protection Officer
Amazon Web Services, Inc. 1200 12th Avenue South, Suite 1200, Seattle, WA 98144, United States	The Mention Me platform is hosted by AWS in a multi-zone data center located in Ireland. AWS provides purely hosting services.	EEA	Please see: https://aws.amazon.com/compliance/eu-data-protection/
Mailjet SAS 13-13 bis, Ruse de L'aubrac 75012 Paris France	Mention Me uses Mailjet for the purposes of sending referral-related emails to participants in the refer-a-friend programme	EEA	Please see: https://www.mailjet.com/privacy-policy/

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How does Mention Me deal with data subject requests?

Follow this procedure if you receive a customer data request:

1. You might receive a subject access request (SAR), an unsubscribe request, a rectification request or a right to be forgotten request (collectively called 'Data Requests') from one of your customers. You will want to cascade that request to relevant data processors like Mention Me. You can do this by emailing Mention Me at either of the following email addresses: data@mention-me.com or subjectaccessrequest@mention-me.com. The email should contain all relevant detail relating to the request and instructions as to how you would like Mention Me to respond.
2. On receipt of your request we will respond. Our platform can automatically retrieve, delete and/or export the necessary data as required or place the person on a suppression list. This is functionality that we have built into our platform with GDPR in mind.
3. Once we have complied with the request, we will reply to your email with confirmation. We will also keep a record in our own record of data request actions.

Procedure if we receive a data request directly from one of your customers:

1. One of your customers may send a Data Request directly to Mention Me. Our revised customer journey (and all emails we send to referrers and referees) contain prominent links to our privacy notice. The privacy notice describes, among other things, all of the rights your customers have in respect of their data and how they may exercise those rights. Customers are directed to our [privacy contact form](#) where they can either unsubscribe or make a data request.
2. If a customer requests to unsubscribe, they will automatically be placed on our suppression list for your refer-a-friend programme. It is made clear in the privacy notice that any unsubscribe applies only to emails sent by Mention Me and not any other marketing emails they may have subscribed to with you.
3. If a customer makes another type of Data Request (i.e a SAR or *right to be forgotten* request), then we will notify you (as Data Controller) of this request and seek instructions. If you are happy for us to respond to the request, then we would identify the individual (usually by asking them to email us from the email we hold on record and corroborate a piece of information we hold about them on our system) and then fulfil their request.
4. Once we have complied with the request, we would email you confirming that we have done so together with relevant details. We would also keep a record of our actions in our own record of data request actions.

Questions?

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How long does Mention Me retain data for?

Running a refer-a-friend programme is an ongoing process. As a result, much of the data we process on your behalf is required to be retained for as long as we continue to operate your refer-a-friend programme. As a result, our default position is that we retain your data for the life of our contract.

We are happy to consider with you (and our platform is able to accommodate) shorter retention periods for certain categories of data we hold, but we would need to consider carefully any potential negative impact on the performance of the programme or your customer user experience that any data deletion might have.

Have you appointed a data protection officer?

Our data protection officer and Head of Legal is Jamie Willoughby. Jamie can be contacted at gdp@mention-me.com.

Do you have a GDPR-compliant data processing agreement?

When we process your data, you are the Data Controller and we are your Data Processor. Under GDPR all Data Controllers need to ensure they have a written agreement in place with their Data Processors regarding the processing of personal data on their behalf.

We have prepared a tailored GDPR-compliant data processing agreement for you to sign. [View and sign Mention Me's data processing agreement](#).

GDPR compliance readiness roadmap

