

GDPR: PRIVACY NOTICES

A privacy notice should include:

1. the intended purposes for processing the personal data
2. and the lawful basis for the processing
3. your retention periods for that personal data
4. who it will be shared with.

“Legitimate Interest”:

1. if you are relying on legitimate interests you need more detail in your privacy notice.

Where children are concerned:

1. Children must have specific protection when you use their personal data for marketing purposes
2. There must be clear privacy notices for children: use child-friendly ways of presenting privacy information, such as: diagrams, cartoons, graphics and videos, dashboards, layered and just-in-time notices, icons and symbols.
3. Children must understand why you require the personal data you have asked for, and what you will do with it, in a way which they can understand.

Checklist

4. As a matter of good practice, explain the risks inherent in the processing, and how you intend to safeguard against them, where necessary in a child friendly way, so that individuals (including children) understand the implications of sharing their personal data.
5. As a matter of good practice, if relying upon parental consent then offer two different versions of privacy notices; one aimed at the holder of parental responsibility and one aimed at the child.
6. Consider using privacy dashboards or other preference-management tools:
 1. **A layered approach** – short notices containing key privacy information that have additional layers of more detailed information.

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2. **Dashboards** – preference management tools that inform people how their data is used and allow them to manage what happens with it.
3. **Just-in-time notices** – relevant and focused privacy information delivered at the time individual pieces of information about people are collected.
4. **Icons** – small, meaningful, symbols that indicate the existence of a particular type of data processing.
5. **Mobile and smart device functionalities** – including pop-ups, voice alerts and mobile device gestures.

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