

PURPOSE OF THIS PRIVACY POLICY

We are committed to protecting your personal information and to being transparent about the information we hold about you.

The purpose of this policy is to give you a clear explanation about how we collect and process your personal information through your use of our services.

It is important that you read this privacy policy so that you are aware of how and why we are using your personal information. This privacy policy supplements our other policies and is not intended to override them.

We will use the information that we collect about you in accordance with:

- The Data Protection Act 1998
- The Privacy and Electronic Communications (EC Directive) Regulations 2003
- The EU General Data Protection Regulation (Regulation EU 2016/679), ('GDPR') which becomes effective from 25 May 2018

This policy explains:

1. Who we are
2. Information we may collect about you
3. How we collect your data
4. How we may use your information
5. Disclosure of your details to third parties
6. Security of your personal information
7. Data retention
8. Your legal rights
9. Notification of changes to our privacy policy
10. Contact details and further information

If you have any questions, please contact the Beverley Law at ALL Creative Branding using the contact details at the end of this policy.

1. WHO WE ARE

ALL Creative Branding Ltd is registered in England and Wales, No: 07414824.

We are experts in branding and communications for healthcare and heritage organisations.

2. INFORMATION WE MAY COLLECT ABOUT YOU

Personal information means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal information about you which we have grouped together as follows:

Identity Data includes first name, last name, title or position.

Contact Data includes company address, delivery address, email address and telephone numbers.

Transaction Data includes details about payments from you and other details of services you have purchased from us.

Usage Data includes information about how you use our services.

Marketing and Communications Data includes your preferences in receiving marketing from

us, and your communication preferences. This also includes us making a note of conversations we have had with you in person and/or communications you send to ALL Creative Branding. This helps us to manage our relationship with you and ensures you only receive communications from us that are relevant and timely.

Technical Data includes internet protocol (IP) address, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal information

Where we need to collect personal information by law, or under the terms of a contract we have with you and you fail to provide that information when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with a proposal for work that you may wish us to undertake for you). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. HOW WE COLLECT YOUR DATA

We collect different information about you in a number of ways:

Information you give us

When you contact us with a request for services or a proposal for services, request marketing materials or give us feedback or respond to a survey, we will store the personal information you give to us such as your name, email address, postal address and telephone number. We will also keep a record of the work we have completed for you.

Automated technologies or interactions

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.

Information from third parties

We may receive information about you from third parties as set out below. We cannot control (nor are we responsible for) their privacy practices or content. We encourage you to read the privacy statements of those sites:

Analytics providers such as Google

Advertising networks such as Facebook/LinkedIn etc

Search information providers such as Google AdWords

4. HOW WE MAY USE YOUR INFORMATION

We will only use your personal information when the law allows us to.

Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where we have your explicit consent before using your personal information in that specific situation. However, generally we do not rely on consent as a legal basis for processing your personal information and you have the right to withdraw consent to marketing at any time by contacting us. You will find the relevant contact details at the end of this policy.

Purposes for which we will use your personal information

We have set out below, in a table format, a description of all the ways we plan to use your personal information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Please note that we may process your personal information for more than one lawful ground depending on the specific purpose for which we are using your information. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

| Purpose/Activity | Type of data | Lawful basis for processing including basis of legitimate interest |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To register you as a new customer | (a) Identity (b) Contact | Performance of a contract with you |
| To process and deliver a service you have requested from us including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us | (a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications | (a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us). |
| To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you for feedback or to take a survey. | a) Identity b) Contact c) Profile d) Marketing and Communications | (a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our services) |
| To deliver relevant website content and information to you. | (a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical | Necessary for our legitimate interests (to study how customers use our /services, to develop them, to grow our business and to inform our marketing strategy) |
| To use data analytics to improve our website, products/ services, marketing and communications with you, customer relationships and experiences | (a) Technical (b) Usage | Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) |
| For marketing communications | a) Identity b) Contact c) Marketing and Communications | Necessary for our legitimate interests (to develop our business and inform our marketing strategy). |

Marketing communications

We may communicate with you from time to time about the work that we do in ways that you find relevant, timely, respectful, and never excessive. To do this, we use data that we have stored about you, such as which events you have attended in the past, as well as any contact preferences you may have told us about.

We use our legitimate organisational interest as the legal basis for communications by post and email. In the case of postal mailings, you may opt out of receiving these at any time using the contact details at the end of this policy.

In the case of email, we will provide you with an option to unsubscribe to any marketing communications that we send you.

As part of our ongoing service to you, we may contact you by email or telephone to provide essential information related to the services we are providing to you.

5. DISCLOSURE OF YOUR DETAILS TO THIRD PARTIES

There are certain circumstances under which we may disclose your personal information to third parties. These are as follows:

To our service providers and partners who work alongside us to meet the requirement of a contract with you. We require all third parties to respect the privacy of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

- Where we are under a duty to disclose your personal information in order to comply with any legal obligation (for example to government bodies and law enforcement agencies).
- To specific, named companies you may wish to contract with. In these cases, we will always ask for your explicit consent before disclosing your personal information.

We do not sell personal details to third parties for any purpose.

6. SECURITY OF YOUR PERSONAL INFORMATION

Security of your personal information

We have put in place appropriate safeguards (both in terms of our procedures and the technology we use) to keep your personal information as secure as possible. We will ensure that any third parties we use for processing your personal information do the same and that they will only process your personal information on our instructions. The third parties will also be subject to a duty of confidentiality.

We will not transfer, process or store your data anywhere that is outside of the European Economic Area, unless we have a contractual agreement in place that is of an equivalent standard to GDPR.

7. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

8. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal information, as follows: -

a) Request access to your personal information

You have a right to request a copy of the personal information that we hold about you. Please use the contact details at the end of this policy if you would like to exercise this right, or any of the rights listed below. If you are a European citizen and consider our use of your personal information to be unlawful, you have the right to lodge a complaint with the UK's supervisory authority, i.e. the Information Commissioner's Office.

b) Request correction of your personal information

You have the right to request that we correct the personal information we hold about you, although we may need to verify the accuracy of the new information you provide to us.

c) Request erasure of your personal information

You have the right to request that we delete or remove personal information where there is no good reason for us continuing to process it. Please note that we may not always be able to comply with your request for erasure if there are specific legal reasons- which will be notified to you at the time of your request.

d) Object to processing of your personal information

You have the right to object to the processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation, which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

e) Request transfer of your personal information

You have the right to request that the personal information we hold about you is transferred to you or to a third party. We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format.

f) Right to withdraw consent

In circumstances where we are relying on your consent to process your personal data, you have the right to withdraw your consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

9. NOTIFICATION OF CHANGES TO OUR PRIVACY POLICY

This privacy policy may change from time to time. We will always communicate any changes to our clients where we have accurate contact details and where they would expect to receive communications from ALL Creative Branding. Please visit our website periodically in order to keep up to date with changes in our privacy policy.

10. CONTACT DETAILS AND FURTHER INFORMATION

Please get in touch with us if you have any questions about any aspect of this privacy policy, and in particular if you would like to object to any processing of your personal information that we carry out for our legitimate organisational interests.

Please also contact us if you have any questions about the information we hold about you, or to change your contact preferences with us:

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Privacy policy effective from 25 May 2018.