

Privacy Policy

Introduction

At Classified Creative Limited, we value your privacy and are dedicated to safeguarding your personal data. This notice aims to provide you with information on how we handle your personal data when you browse our website, regardless of your location, and during interactions within the scope of our business. Additionally, it will outline your privacy rights and the legal protections in place for you.

1. Important information

Purpose of this privacy notice

This privacy notice is designed to inform you about the collection and processing of your personal data by Classified Creative Limited when you use this website. Whether you're signing up for our newsletter, accessing free marketing advice, engaging with social media tips or downloadable content, using our 'contact us' form or participating in a competition, we want you to be informed about how your data is handled.

Beyond online interactions, this notice extends to highlight how Classified Creative Limited collects and processes your personal data in the course of our broader business activities, spanning events such as exhibitions, networking events and communications via telephone, email, or post.

To ensure a comprehensive understanding of how and why we use your data, it is essential to read this privacy notice alongside any other privacy or fair processing notices provided on specific occasions when collecting or processing your personal data. This privacy notice serves as a supplement to other notices and is not intended to override them.

It's important to note that our website is not intended for children and we do not knowingly collect data pertaining to children.

Controller

Classified Creative Limited serves as the controller responsible for managing your personal data, collectively denoted as "Classified Creative Limited," "we," "us," or "our" in this privacy notice.

To address any queries regarding this privacy notice or to exercise your legal rights, a designated data privacy manager has been appointed. Feel free to contact the data privacy manager using the provided details if you have questions or if you wish to pursue your rights under this notice.

Contact Details

Our full details are:

Full name of legal entity: Classified Creative Limited

Name or title of Data Privacy Manager: Alex Ball, Director | Thomas Kelly, Director

Email address: alex@classifiedcreative.co.uk | tom@classifiedcreative.co.uk

Postal address:

Telephone number:

You are entitled to file a complaint with the Information Commissioner's Office (ICO), the primary regulatory body for data protection matters in the UK (www.ico.org.uk), at any time. However, we would appreciate the opportunity to address your concerns internally before you escalate the matter to the ICO. Please contact us first with any issues you may have.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 2 January 2024 and historic versions can be obtained by contacting us. The data protection law in the UK changed on 25 May 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

Our website may contain links to third-party websites, plug-ins and applications. Clicking on these links or activating these connections might result in third parties collecting or sharing data about you. We do not have control over these external websites and do not assume responsibility for their privacy policies. Upon exiting our website, we recommend reviewing the privacy notices of each site you visit.

2. Information collected relating to you

Personal data, or personal information, refers to any information about an individual that enables their identification. This excludes data from which identity has been removed, resulting in anonymous data. We may collect, utilise, store and transfer various forms of personal data about you, categorised as follows:

- **Identity Data** includes first name, last name or company.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, browser type and version, 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 this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.

- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We gather, utilise, and disclose Aggregated Data, such as statistical or demographic information, for various purposes. Although Aggregated Data may be derived from your personal information, it does not qualify as personal data under the law, as it does not directly or indirectly disclose your identity. For instance, we might compile Usage Data to determine the percentage of users accessing a specific website feature. However, if we merge or link Aggregated Data with your personal information in a way that can identify you directly or indirectly, we handle the combined information as personal data, subject to the terms outlined in this privacy notice.

We refrain from collecting 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, health information, and genetic or biometric data. We also do not gather information regarding criminal convictions and offences.

In cases where you fail to provide personal data

If the collection of personal data is required by law or under the terms of a contract we have with you, and you do not provide the requested data, we may be unable to fulfil the contractual obligations we have or are attempting to establish with you. For instance, this could result in the cancellation of a service you have with us. In such instances, we will notify you if this becomes necessary at the time.

3. How do we collect your personal data

We employ various methods to gather information about you, and these include:

Direct Interactions: You may provide us with your Identity, Contact, and Financial Data by completing forms or corresponding with us via post, phone, email or other means. This encompasses the personal data you provide when:

- Applying for our services
- Subscribing to our service or publications
- Requesting marketing materials
- Participating in a competition, promotion, or survey
- Offering feedback
- Leaving a comment on our website

Automated Technologies or Interactions: When you engage with our website, we may automatically capture Technical Data related to your device and browsing actions. We collect this personal data through the use of cookies and similar technologies. Additionally, we might receive Technical Data about you from other websites that utilise our cookies. Refer to our cookie policy for more details.

Third Parties or Publicly Available Sources: We may obtain personal data about you from various third parties and public sources, as outlined below:

- Technical Data from analytics providers, such as Google Analytics (based in the US)
- Identity and Contact Data from publicly available sources like Companies House and the Electoral Register (based within the EU)
- Technical Data from advertising networks
- Technical Data from search information providers
- Identity and Contact Data provided at events, such as business cards or attendee lists
- Identity and Contact Data from data brokers or aggregators (based within the EU)

4. How we use your personal data

We will use your personal information exclusively in accordance with applicable laws. Primarily, we will employ your personal data in the following situations:

- **Contractual Performance:** When it is necessary to fulfil or adhere to the contractual obligations we are entering into or have already entered into with you.
- **Legitimate Interests:** In cases where the processing is essential for our legitimate interests (or those of a third party), provided that your interests and fundamental rights do not outweigh those interests.
- **Legal or Regulatory Compliance:** When it is obligatory to process your personal data to comply with legal or regulatory requirements.

We consider consent as one of the legal bases for processing your personal data, specifically when you have granted it. This pertains particularly to the transmission of third-party direct marketing communications via email or text message, where we rely solely on your consent. You retain the right to withdraw consent for marketing activities at any time by reaching out to us.

Purposes for processing your personal data:

Outlined below in the table are the various ways in which we intend to use your personal data, along with the corresponding legal bases we rely upon. We have also pinpointed our legitimate interests where applicable.

It is important to note that we might process your personal data on more than one lawful ground, depending on the specific purpose. If you require details regarding the specific legal basis we are relying on for processing your personal data, particularly when multiple grounds are mentioned in the table, please feel free to get in touch with us.

Purpose/Activity	Type of data	Legal grounds for processing, including the basis of legitimate interest.
To register you as a new customer.	(a) Identity (b) Contact	<ul style="list-style-type: none"> • Performance of a contract with you
To process and deliver your order including: <ul style="list-style-type: none"> • Managing payments, fees and charges • Collect and recover money owed to us 	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing & Communications	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: <ul style="list-style-type: none"> • Notifying you about changes to our terms or privacy policy • Asking you to leave a review or take a survey • Service announcements 	(a) Identity (b) Contact (c) Profile (d) Marketing & Communications	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary to comply with a legal obligation • Necessary for our legitimate interests (to keep our records updated and to study how clients use our services)
To interact with you on our website, for instance, in the comments section of one of our blog posts.	(a) Identity (b) Contact	<ul style="list-style-type: none"> • Required for our legitimate interests in engaging with you, facilitating comments and addressing any issues raised in your comments
To allow you to participate in a prize draw, competition or take part in a survey.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing & Communications	<ul style="list-style-type: none"> • Fulfilment of contractual obligations with you and essential for our legitimate interests (analysing customer usage of our products/services, enhancing them, and expanding our business)
To manage and safeguard our business and this website, which includes resolving issues, conducting data analysis, performing testing,	(a) Identity (b) Contact (c) Technical	<ul style="list-style-type: none"> • Necessary for our legitimate interests, including running our

<p>maintaining systems, providing support, generating reports and hosting data.</p>		<p>business, providing administration and IT services, ensuring network security, preventing fraud, and in the context of a business reorganisation or group restructuring exercise</p> <ul style="list-style-type: none"> • Necessary to comply with a legal obligation
<p>To deliver tailored website content and advertisements to you and evaluate the effectiveness of the advertising we display. This may involve the use of pixels or cookies to present relevant ads on social media.</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing & Communications (f) Technical</p>	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
<p>To use our database and leverage data analytics to refine our website, services, marketing approaches, customer relationships, and overall user experiences.</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing & Communications</p>	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
<p>To provide you with suggestions and recommendations regarding services and funding that might interest you, particularly through our direct marketing initiatives, including our email newsletter and social media marketing.</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing & Communications</p>	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy) • Consent
<p>To gather data related to recruitment purposes.</p>	<p>(a) Identity (b) Contact</p>	<ul style="list-style-type: none"> • Fulfilment of contract • Necessary for our legitimate interests

		(to grow our business)
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Marketing and personal data

Our commitment is to offer you choices when it comes to the use of your personal data, particularly in the realms of marketing and advertising.

Promotional offers from Us

We may analyse your Identity, Contact, Technical, Usage, and Profile Data to understand your preferences and interests. This analysis guides our decisions on which products, services, and offers may be relevant to you (referred to as marketing).

You will receive marketing communications from us if you have chosen to do so, requested information, purchased services, or provided your details in a competition, and in each case, have not opted out of receiving marketing.

Third-party marketing

Before sharing your personal data with any external company for marketing purposes outside Classified Creative Limited, we will seek your explicit opt-in consent.

Opting out

You have the option to stop receiving marketing messages from us or third parties at any time. You can do so by using the opt-out or unsubscribe links in marketing messages or by reaching out to us directly.

If you choose to opt out of marketing, we will maintain a restricted record of your Contact and Identity Data to prevent future marketing efforts. No other processing will occur with this information unless informed otherwise.

Cookies

You have the ability to configure your browser settings to refuse some or all cookies or receive alerts when websites attempt to set or access cookies. Please note that disabling or refusing cookies may impact the accessibility and functionality of certain parts of our website. For more details on the cookies we use, refer to our cookies policy.

Change of Purpose

We will only use your personal data for the purposes initially collected unless we reasonably determine the need for another compatible reason. If there's a change in purpose, we will notify you, explaining the legal basis for the shift. Rest assured, we will not process your

personal data without your knowledge or consent, in accordance with the stated rules, unless required or permitted by law.

5. Personal data disclosures

Your personal data may be shared with other entities.

- External Third Parties.
- Third parties to whom we may opt to sell, transfer, or merge parts of our business or assets. In the event of such a change, the new owners may utilise your personal data in accordance with the terms outlined in this privacy notice.

We mandate that all third parties respect the security of your personal data and handle it in compliance with the law. Our third-party service providers are prohibited from using your personal data for their own purposes and are authorized only to process it for specific purposes and in line with our instructions.

6. International data transfers

We may engage external third parties located outside the European Economic Area (EEA), necessitating the transfer of your personal data beyond the EEA.

When transferring your personal data out of the EEA, we ensure a comparable level of protection by implementing one of the following safeguards:

- Transferring personal data only to countries deemed by the European Commission to provide an adequate level of data protection.
- Verifying the data transfer procedures of U.S.-based providers for compliance with European Economic Area (EEA), UK, and Switzerland data transfer standards before utilizing their services.

For additional details on the specific mechanism employed when transferring your personal data out of the EEA, please feel free to contact us.

7. Data security

We have implemented appropriate security measures to prevent accidental loss, unauthorised access, use, alteration, or disclosure of your personal data. Access to your personal data is restricted to employees, agents, contractors and other third parties with a legitimate business need to know. They process your personal data solely based on our instructions and are bound by a duty of confidentiality.

Procedures are in place to address any suspected personal data breach. We commit to notifying you and relevant regulators of a breach if legal requirements dictate such notification.

8. Data Retention

How long will we retain your personal data?

We will retain your personal data only for the duration necessary to fulfil the purposes for which it was collected, including meeting legal, accounting or reporting obligations.

The appropriate retention period is determined by factors such as the type, quantity, and sensitivity of the personal data, the potential risk of unauthorised use or disclosure, the purposes of the processing, legal requirements and the feasibility of achieving those purposes through alternative means.

9. Your legal rights

You are legally entitled to:

- Seek access to your personal information.
- Seek the correction of any inaccuracies in your personal data.
- Request the deletion of your personal data.
- Object to the processing of your personal information.
- Request restrictions on the processing of your personal data.
- Ask for the transfer of your personal data.
- Withdraw your consent at any given time.

To exercise these rights, please contact us at your convenience.

No fee is usually required, unless your request is unfounded, repetitive, or excessive. We may request specific information to confirm your identity and expedite our response.

We aim to respond to all legitimate requests within one month, with possible extensions for complex cases.

Glossary

Lawful Basis

- **Legitimate Interest:** We process your personal data based on our business interests, ensuring a balance between positive and negative impacts on you and your rights. Further information is available by contacting us.
- **Performance of Contract:** Processing data is necessary for the performance of a contract or pre-contractual steps.
- **Comply with a Legal or Regulatory Obligation:** Processing is necessary for compliance with legal or regulatory obligations.

External Third Parties

- Service providers offering IT and system administration services, web platforms, electronic contract signing, and data shredding services, based in the United Kingdom.

- Professional advisers such as lawyers, bankers, auditors, accountants, HR consultants, payroll and pension companies, and insurers based in the United Kingdom.
- HM Revenue & Customs, regulators, and other authorities in the United Kingdom requiring reporting of processing activities.
- Marketing automation platforms
- Survey development and distribution platforms
- CRM, Contract Signing, and Password Management platforms
- Social media platforms acting as processors or joint controllers.