

# Privacy and Cookie Policy

## Introduction

The Collective understands that your privacy is important to you and that you care about how your information is used and shared online. We respect and value the privacy of everyone whose personal data we collect, whether it be through our websites [www.thecollectivegroup.co.uk](http://www.thecollectivegroup.co.uk) or [www.thecollective.education](http://www.thecollective.education) or whether we are providing you with a service, receiving a service from you or marketing our services to you. We will only collect and use information in ways that are useful to you and in a manner consistent with your rights and our obligations under the law.

Please read this Privacy Policy carefully and ensure that you understand it. It describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.

## Who Are We And What Do We Do?

We are a video and marketing agency, providing marketing support services to our clients, including video production, photography, PR, social media, website support and other digital marketing services. We collect the personal data of the following types of people to allow us to undertake our business:

- Prospective and live client contacts;
- Supplier contacts to support our services;
- Employees, consultants, temporary workers;
- Website users

For the purpose of applicable data protection legislation (including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679) (the "GDPR"), your rights under the GDPR are set out in this notice but will only become law on 25<sup>th</sup> May 2018. It is important to point out that we may amend this Privacy Policy from time to time. Please just visit this page if you want to stay up to date, as we will post any changes here.

## Information You Give To Us Or We Collect About You.

This is information about you that you give us by filling in forms on our website [www.thecollectivegroup.co.uk](http://www.thecollectivegroup.co.uk) and [www.thecollective.education](http://www.thecollective.education) or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our site, to enter our database, subscribe to our services, attend our events, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey, and when you report a problem with our site.

The information you give us or we collect about you may include your name, address, private and corporate e-mail address and phone number and links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, business Facebook or corporate website.

## **Information We Collect About You When You Visit Our Website.**

With regard to each of your visits to our websites we will automatically collect the following information:

Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information if applicable, browser type and version, information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), services you viewed or searched for, page response times, download errors, length of visits to certain pages and page interaction information (such as scrolling, clicks, and mouse-overs).

## **Information We Obtain From Other Sources**

This is information we obtain about you from other sources such as LinkedIn, corporate websites, your business card, personal recommendations or other referrals that we may receive about you. We will in some circumstances rely on consent for particular uses of your data and you will be asked for your express consent, if legally required.

## **Video and Photography Information**

During our video and photography production activities we will typically collect the following types of personally identifiable information:

- The physical image of an individual
- Occasionally, the name of the individual
- Where the individual was
- When the individual was there
- Often, why the individual was there
- Often, information about organisations and persons the individual may be associated with

This information is collected when an individual appears in front of one of our cameras.

We take great care to ensure that the videos and images we produce do not jeopardise the rights or privacy of individuals who appear within them. Our Terms of Service require that our customers have obtained consent from all individuals who appear in the videos and images that we produce. All of our customers receive the opportunity to provide feedback on any videos and images before we provide them with the final output.

We do not publish any videos or images that our customers have not signed off and approved. If we have captured images of individuals who have not provided consent, or their consent does not cover the intended use of the footage or images we've captured, we will not use them and, if instructed to do so by our client, they will be permanently deleted from our systems.

We take the videos and images we capture and edit them to meet the commercial needs of our customers. We may use some of the videos and images in our own promotions for The Collective.

## **Consent**

Should we want or need to rely on consent to lawfully process your data we will request your consent orally, by email or by an online process for the specific activity we require consent for and record this (your response) on our system. Where consent is the lawful basis for our processing you have the right to withdraw your consent to this particular processing at any time.

## **How Do We Use Your Data?**

All personal data is stored securely in accordance with the EU General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR). We use your data to provide the best possible products and services to you. This includes:

- Providing and managing your Account
- Providing and managing your access to our websites
- Personalising and tailoring your experience on our websites
- Supplying our products and services to you
- Personalising and tailoring our products and services for you
- Responding to communications from you
- Supplying you with email newsletters, alerts etc. that you have subscribed to (you may unsubscribe or opt-out at any time by clicking the 'update your preferences' link in the email or by contacting us at [team@thecollectivegroup.co.uk](mailto:team@thecollectivegroup.co.uk))
- Market research
- Analysing your use of our websites and gathering feedback to enable us to continually improve our websites and your user experience

In some cases, the collection of data may be a statutory or contractual requirement, and we will be limited in the products and services we can provide you without your consent for us to be able to use such data. Once you have submitted your data to us, we use your data for marketing purposes which may include contacting you by email, telephone, text message with information, news and offers on our products and services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, as amended in 2004, 2011 and 2015.

Under GDPR we will ensure that your personal data is processed lawfully, fairly, and transparently, without adversely affecting your rights. We will only process your personal data if at least one of the following basis applies:

- a) you have given consent to the processing of your personal data for one or more specific purposes;
- b) processing is necessary for the performance of a contract to which you are a party or in order to take steps at the request of you prior to entering into a contract

- c) processing is necessary for compliance with a legal obligation to which we are subject;
- d) processing is necessary to protect the vital interests of you or of another natural person;
- e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; and/or processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

## **How and Where Do We Store Your Data?**

We only keep your data for as long as we need to in order to use it as described above and/or for as long as we have your permission to keep it. In any event, your data will be deleted if you notify us via email, telephone or post. Some or all of your data may be stored or transferred outside of the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland and Liechtenstein). You are deemed to accept and agree to this by using our websites and submitting information to us. If we do store or transfer data outside the EEA, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the EEA and under the GDPR. Such steps may include, but not be limited to, the use of legally binding contractual terms between us and any third parties we engage with.

Data security is of great importance to us, and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected through our websites and other methods. The Company shall ensure that the following measures are taken with respect to the collection, holding, and processing of personal data:

- All employees, agents, contractors, or other parties working on behalf of the Company shall be made fully aware of both their individual responsibilities and the Company's responsibilities under the Regulation and under this Policy, and shall be provided with a copy of this Policy
- Only employees, agents, sub-contractors, or other parties working on behalf of the Company that need access to, and use of, personal data in order to carry out their assigned duties correctly shall have access to personal data held by the Company
- All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be appropriately trained to do so; The performance of those employees, agents, contractors, or other parties working on behalf of the Company handling personal data shall be regularly evaluated and reviewed
- All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be bound to do so in accordance with the principles of the Regulation and this Policy by contract
- All agents, contractors, or other parties working on behalf of the Company handling personal data must ensure that any and all of their employees who are involved in the processing of personal data are held to the same conditions as those relevant employees of the Company arising out of this Policy and the Regulation.

Notwithstanding the security measures that we take, it is important to remember that the transmission of data via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting data to us via the internet.

For video and photography information collected, during the production process each project is given a unique ID number and title to help us identify it. A folder is created on our in-house production server for each project. The videos and images captured by our cameras are added to this folder and we use commercial video and photo editing software to edit them. Once the project is completed we archive it as-is for future reference should a customer request copies of their videos and images, or would like to make modifications to the content we've produced for them. We do not apply any further processing to the data we have in our archives. All project data is removed from our system after two years.

### **Do We Share Your Data?**

We may contract with third parties to supply products and services to you on our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the law. We currently contract with:

<u>Third-party Name</u>	<u>Type of data subject</u>
Quickbooks	First name, last name, email address, company information, purchase invoices
Mailchimp	First name, last name, email address
Zoho	First name, last name, email address
Dropbox	First name, last name, email address

### **How Can You Control Your Data?**

When you submit information via our websites or other methods, you may be given options to restrict our use of your data. We aim to give you strong controls on our use of your data (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails or by emailing us to let us know your preferences).

### **Your Right To Withhold Information And Your Right To Withdraw Information After You Have Given It**

You may access most areas of our websites without providing any data at all. However, to use all features and functions available on our websites you may be required to submit or allow for the collection of certain data. You may restrict your Internet browser's use of Cookies, for more information see below. You may withdraw your consent for us to use your personal data as set out above at any time by contacting us using the details set out

below, and we will delete your data from our systems. However, you acknowledge this may limit our ability to provide the best possible products and services to you.

### **How Can You Access Your Data?**

You have the legal right to ask for a copy of any of your personal data held by us (where such data is held). Please contact us for more details at [team@thecollectivegroup.co.uk](mailto:team@thecollectivegroup.co.uk) or using the contact details below.

### **What Cookies Do We Use And What For?**

Our websites may place and access certain first party cookies on your computer or device. First party cookies are those placed directly by us and are used only by us. We use cookies to facilitate and improve your experience of our websites and to provide and improve our products and services. We have carefully chosen these cookies and have taken steps to ensure that your privacy is protected and respected at all times. All cookies used by and on our websites are used in accordance with current English and EU cookie Law.

Before cookies are placed on your computer or device, you will be shown a pop-up which shows our cookie policy. By viewing the pop-up, you are giving us consent to the placing of cookies and you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of cookies; however certain features of our websites may not function fully or as intended. You can deny consent by exiting from our website.

Certain features of our websites depend on cookies to function. UK and EU cookie law deems these cookies to be "strictly necessary". Your consent will not be sought to place these cookies. You may still block these cookies by changing your internet browser's settings as detailed below but please be aware that our websites may not work as intended if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

Our websites use analytics services provided by Google. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling us to better understand how people use our websites. This, in turn, enables us to improve our websites and the products and services offered through it. You do not have to allow us to use these cookies, as detailed below, however whilst our use of them does not pose any risk to your privacy or your safe use of our websites, it does enable us to continually improve our websites, making them a better and more useful experience for you.

The analytics service(s) used by our websites use(s) cookies to gather the required information. These cookies may be placed immediately when you first visit our websites and it may not be possible for us to obtain your prior consent. You may remove these cookies and prevent future use of them by following the steps set out below.

The analytics service(s) used by our websites use(s) the following cookies:

<u>Name of Cookie</u>	<u>First / Third Party</u>	<u>Purpose</u>
Google	Third	Analytics

You can choose to enable or disable cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party cookies. By default, most internet browsers accept cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete cookies at any time however you may lose any information that enables you to access our websites more quickly and efficiently including, but not limited to, login and personalisation settings. It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

## **Summary of Your Rights under GDPR**

Under the GDPR, you have:

- the right to request access to, deletion of or correction of, your personal data held by us
- the right to complain to a supervisory authority
- the right to be informed of what data processing is taking place
- the right to restrict processing
- the right to data portability
- the right to object to processing of your personal data.

To enforce any of the foregoing rights or if you have any other questions about our websites or this Privacy Policy, please contact us using the details set out below.

## **Contacting Us**

If you have any questions about our websites or this Privacy Policy, please contact us by email at [team@thecollectivegroup.co.uk](mailto:team@thecollectivegroup.co.uk) or by telephone on +44 1202 682 322, or by post at The Cube, 35 Banbury Road, Nuffield Industrial Estate, Poole, Dorset BH17 0GA. Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you.

## **Changes To Our Privacy Policy**

We may change this Privacy Policy as we may deem necessary from time to time, or as may be required by law. Any changes will be immediately posted on our websites and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our websites following the alterations. We recommend that you check this page regularly to keep up-to-date.