

PRIVACY POLICY

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1. Introduction

This Privacy Policy sets out how IDEALee Limited uses and protects all personal data that is given when using our website (www.IDEALee.co.uk) or working with IDEALee.

This Policy refers to 'personal data' as information concerning any living person that is not already in the public domain and 'sensitive data' as data that 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.

IDEALee do not collect any Sensitive Data about you and is committed to ensuring personal data is always protected. Should we ask for personal data to be provided by which an individual can be identified, either when using our website or in the course of us providing services, then it will only be used in accordance with this Privacy Policy, website Terms of Use and our Terms and Conditions or Contract for Services (for providing a service).

Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may

not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide us with the requested data, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

This policy complies with the General Data Protection Regulations (GDPR) 2018.

2. What information do IDEAlee collect?

Personal data we may collect is as follows:-

- name
- business/company name
- job title
- contact information including email address, postal address, business/home telephone, mobile
- personal data of others in Client's business (if given to us by the Client or required for a project)
- industry information
- research information
- photographs
- website visitor activity, demographics, behaviours and location

3. What we do with the information we gather?

- Contact Clients to follow up on product or service requests.
- Provide quotes, invoices and to communicate with our Clients during their projects (eg. providing any marketing, creative or photographic service/s requested).
- During the projects themselves, eg work may require personal information to be included within them.
- We may use the information to improve our services.
- Respond to communications.
- Analyse use of our website to enable us to continually improve our site and the user experience.
- Provide other requested communication, eg email updates, blogs, offers, news. Clients will be given the option to subscribe and will be provided with information on how to unsubscribe at any time.

4. Security

We have put in place physical and electronic procedures to safeguard and secure data. However, no method of transmission over the Internet or via the post, or method of storage is 100% secure. While we strive to use commercially acceptable means to protect your personal data, we cannot guarantee its absolute security. As such we make no warranties as to the level of security afforded to your data, except that we will always act in accordance with the relevant UK and EU legislation.

5. How and where we store your data?

Website, email and 'cloud storage' (also see Website Terms of Use):

If we would like to collect personal data through our website, the user will have to give their permission for us to do so and we will make it clear to the user exactly when we are collecting this and why.

- Website hosting & build (GoDaddy): We use a third party, GoDaddy, to host our website on their server and to provide our Wordpress access to build and update our site. GoDaddy servers are located in 9 facilities worldwide, therefore if you do

provide any personal data via our website please note that this may be transmitted or held internationally.

Please see GoDaddy's Privacy Statement (<https://bit.ly/2f3XfsR>) and the WordPress (which is run by Automattic Inc) Privacy Notice (<https://bit.ly/1IvoGo2>).

- Website analytics (Google): When a user visits www.IDEAlee.co.uk we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns and demographics. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website and we do not use cookies on our website.
- email (GSuite): We use google mail to provide our email service and this also holds a contacts list and our calendars. Documents being sent via email or the internet are password protected if they contain sensitive personal data.
- Google Drive (cloud storage): We use our google drive to securely store and back up IDEALEE documents.

For more specific information please see Google's Privacy Statement (<https://bit.ly/2xd4FbS>).

Laptops & PCs:

IDEALEE computers are password protected and are locked when unattended. PCs/laptops are synced to our secure google drive so that this data can be accessed externally and is protected. Client assets and work that is in progress is backed up to external hard drives and the hard drives are stored in a locked fire box at the business address.

Hard Copy Documents:

All hard copy documents, containing personal Client information/data and all IDEALEE accounts/business documentation, are stored in locked filing cabinets at the business address. Post will be sent by recorded delivery if it contains personal data.

Social Media:

We do not collect information via our social media accounts but by interacting with our business pages and posts (eg facebook, Instagram, Twitter, LinkedIn, Google+) or contacting us, please be aware that you may be identifiable. If you do provide personal data to us in this manner we will manage this information as per the terms of this Policy.

Invoicing:

Invoicing is usually carried out in house however, for certain projects, we may invoice Clients via our IDEALEE business paypal account. In order to do so your name, email address, amount owed, project detail (and any other data deemed by IDEALEE as essential for this purpose) will be entered in to their system to create an invoice which will be emailed to the Client. You can see Paypal's Privacy Policy (<https://bit.ly/2Lsltdh>) for more information on how they deal with the data that we give them.

6. How do we share your data?

We may disclose personal data and information to any of our employees, suppliers or subcontractors insofar as reasonably necessary for the purposes as set out in this privacy policy. In addition, we may disclose personal data or information, without further consent being required:

- to the extent that we are required to do so by law;
- in connection with any legal proceedings or prospective legal proceedings;

- in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
- to the purchaser (or prospective purchaser) of any business or asset which we are (or are contemplating) selling;
- to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.
- Except as provided in this privacy policy, we will not provide or sell your information to third parties.

7. Your right to controlling your personal data:

At any point while IDEAleee is in possession of, or processing an individual's personal data, the following rights apply:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.

You may choose to restrict the collection or use of your personal data in the following ways:

1. When a Client accepts our quote before we begin working together they will be asked to read and agree to this Privacy Policy and our Terms and Conditions. If they do not agree with any aspect of either document they are encouraged to raise their concerns, so that we can discuss and process their personal data in accordance with their wishes.
2. Individuals have the right to ask us not to process their personal data for marketing purposes. Whenever you are asked to fill in a form on the website or when accepting a quote, you can indicate whether you would like to receive our marketing material, blogs, updates by checking the box to request this or leaving the box unchecked if you do not wish for us to send you the highlighted information.
3. Clients can always email us at hello@IDEAleee.co.uk to exercise any of their rights above, eg to unsubscribe to any communications.

8. Retention Procedure

IDEAleee will process personal data during the duration of any project, contract or agreement and will continue to store only the personal data needed for up to seven years after the contract has expired to meet any legal obligations. After seven years any personal data not needed will be deleted (soft copies removed from our server and hard copies shredded and disposed of confidentially).

9. How do we edit sensitive data?

If you believe that any personal data we are holding on you is incorrect or incomplete, please get in touch with us as soon as possible (details at the end of the Policy). We will promptly correct any information found to be incorrect. We will update the necessary databases and store the request as a hard copy as well as a soft copy. We will not make changes if we deem that this will affect our legal obligations.

10. How do we erase a data subject's personal data?

If this is requested, we will supply a request form for the erasure of personal data that doesn't need to be maintained for legal obligations or exercise of official authority (i.e HMRC). In order to erase this data, we will delete all soft copies and hard copies will be shredded and disposed of securely.

11. Access to information

We deal with minimal amounts of personal data for each of our Clients and we are keen to be as open as we can in terms of what we have, why we have it and to make this accessible if it is requested. Individuals can find out if we hold any personal data by making a 'subject access request'. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

To make a request for any personal data we may hold, you need to put the request in writing and address it as detailed at the bottom of this Privacy Policy in Clause 13. We will then provide this to you within the legal timeframes, which in the majority of cases will be one month (if it is to be longer you will be advised).

12. In which circumstances do we report a data breach?

A loss of personal data does not result in a data breach unless, the breach results in a risk to the rights and freedoms of an individual. Such as, the breach may have detrimental effects on their reputation, financial loss, loss of confidentiality, discrimination or any significant economic or social disadvantage.

Should a data breach occur, depending on the severity, we will:

- Report internally to the Director and Data Controller, Lee Crawley
- Report back directly to the individual exposed if there is a high risk to rights & freedoms
- Report to the ICO (Information Commissioner's Office) with 72 hours.

13. IDEAle Limited contact details

(Registered in England & Wales, Company No. 10233389)

FAO: Lee Crawley, Director
IDEAle Limited
5 Lucas Close
Crawley
West Sussex
RH10 7EY
01293 885 584 or 07792 757 739
hello@IDEAle.co.uk

IDEAle Limited are registered with the ICO.

Any changes we may make to our Privacy Policy will be posted on this webpage. Please check back frequently to see any updates or changes.

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