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# Privacy Policy of Friend Studio Limited

# Table of Contents

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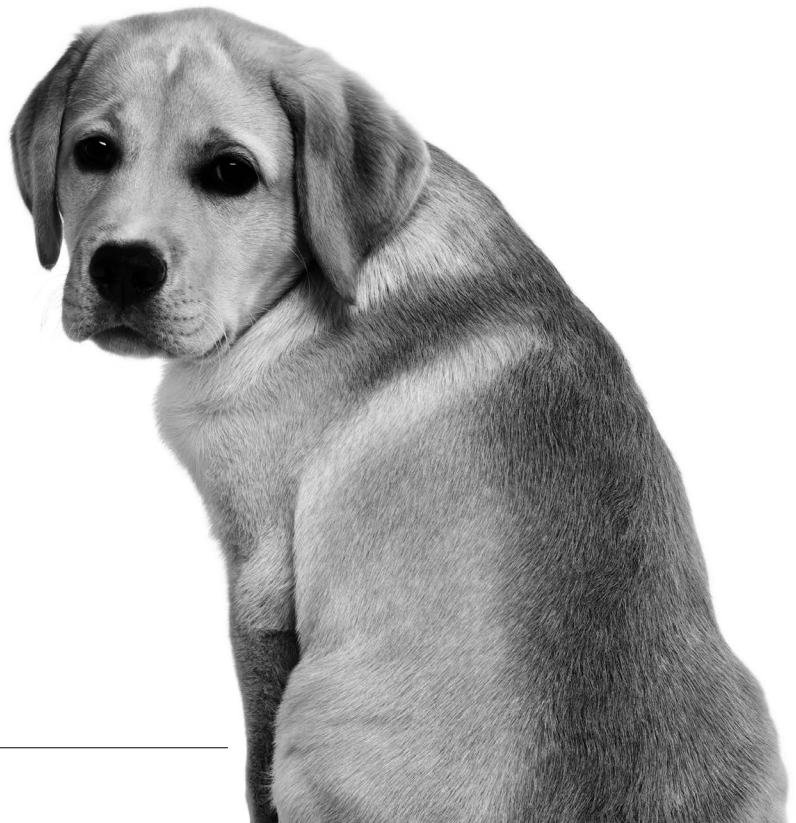
3	Management commitment
4	Our fundamental principles
5	Privacy notice Principle clarification
6	Who we are and what this notice covers Information we collect Information you provide to us Information we collect automatically Information we collect from other sources
7	How we use information Sharing of personal data How we share Personal Data Security Retention Data destruction/erasure Your choices
8	Your rights Other things you should know Complaints Contact details

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# Management commitment

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The Management at Friend Studio Limited is committed to ensuring that all personal data is handled responsibly, lawfully and securely. As such, your privacy is critically important to us and the senior management team are responsible for ensuring that the fundamental principles below are applied by all staff dealing with personal data.



# Our fundamental principles

- 1 We ensure that your data is **processed lawfully**, fairly and in a transparent manner
- 2 We only collect your data for specified, explicit and **legitimate purposes**
- 3 We only gather your data **if it is adequate, relevant and limited** to what is necessary
- 4 We make sure that wherever possible, **your data is accurate and properly maintained**
- 5 We only keep your data for **as long as necessary**
- 6 We ensure that **your data is protected** and handled securely



# Below is Friend's privacy notice, which incorporates and clarifies these principles

## Personal Data

Personal data means any information relating to an identified or identifiable natural person (known as the 'data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

## Data Subject

The "Data Subject" is the individual that the personal data relates to and identifies

## Data Controller

Controller means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

## Data Processor

Processor means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

## Processing

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

## Filing System

Filing System means any structured set of personal data which are accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis.

## Consent

Consent of the Data Subject means any freely given, specific, informed and unambiguous indication of the Data Subject's wishes by which, he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

## Legitimate Interest

Legitimate Interest is a designation for the use of personal data where that data is controlled and/or processed by the company or processed by a 3rd party contractor of the company, except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject, which require protection of Personal Data, in particular where the Data Subject is a child.

## Special Category

Special Category data is personal data which reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health, sex life or sexual orientation.

## Data Breach

Personal Data Breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise processed.

# Who we are and what this notice covers

## Friend Studio Limited

(Registered in England 150 4250 53) is a Design agency based in London.

Undertaking content strategy, design, branding, project management and production to produce end-to-end stakeholder communication solutions for Private and Public sector clients.

Our service incorporates all aspects of stakeholder communications from strategy through to implementation in both digital and printed formats.

This policy document aims to outline our approach to the obtaining, handling, retention, disposal and data protection throughout the life cycle of our interaction with your data, for us and our partners (where applicable) and your choices and rights within each of these.

## This Privacy Notice applies to information that we collect about you when:

- Having personal interactions via various forms of electronic messaging, voice and video communication or face to face.
- Communication of relevant marketing information that you have either consented to or otherwise expect from us as part of an established relationship.
- Out of contractual necessity such as in the delivery of products or services or the employment of our staff
- From 3rd parties with whom you have agreed for them to share your data with us.

Throughout this Privacy Notice we'll refer to our other products and services collectively as 'Services'.

[Below we] explain how we collect, use, and share information about you, along with the choices that you have with respect to that information.

Please note that this Privacy Notice does not apply to any of our products or services that have a separate Privacy Notice. These will be presented to you as appropriate should these products or services relate to you.

If you have any questions about this Privacy Notice, please contact us as described in the Contact Section below.

## Information we collect

We only hold information about you if we have a reason to do so—for example, to provide our Services, to communicate with you, or to make our Services better.

We collect information in three ways: if and when you provide information to us, automatically through operating our Services, and from outside sources.

## Information you provide to us

We hold information that you provide to us. The amount and type of information depends on the context and how we use the information. Here are some examples:

- **Basic Information:** We ask for basic information from you in order to set up your record. For example, to create a project we require a contact name, email address, and telephone number.
- **Business Account Information:** If you have a business account with us we will require certain information in order to fulfil our obligations to you. This information will include contact details such as email, phone number and mailing address for individuals associated with your account as well as account preferences and service history in order to provide you with the best service possible.
- **Transaction and Billing Information:** If you buy something from us, you will provide additional personal and payment information that is required to process the transaction and your payment, such as your name, payment information, and contact information.
- **Communication Purposes:** You may also provide us information when you respond to surveys or communicate with our team about a service we provide.

## Information we collect automatically

We also collect some information automatically:

**Log Information:** We collect information that web browsers, mobile devices, and servers typically make available, such as geography, browser type, device type and the date and time of access. We collect log information when you use our website in order to assess its effectiveness.

**Usage Information:** We collect information about your usage of our website. For example, we collect information about the actions that users perform, such as which pages are visited and the duration they are viewed. We use this information to get insights on how people use our website so we can make it better.

**Information from Cookies:** A cookie is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. Client-side cookies are used to verify the login status of customers using products or services linked directly with our website. Usage of a cookie is in no way linked to any personally identifiable information while on our site. If a user rejects the cookie, they may still use our website; however, the user may not be able to access all areas of our website.

## Information we collect from other sources

We may also obtain information from third party services about individuals who are not yet our users, which we may use, for example, for marketing purposes.

# Who we are and what this notice covers continued

## How we use information

We use information about you as mentioned above and as follows:

- To communicate with you about services and events offered by Friend that we think will be of interest to you, solicit your feedback, or keep you up to date with relevant case studies, industry trends and thought leadership.

## Sharing of Personal Data

### How we share Personal Data

We do not sell private personal information.

We share your Personal Data in the limited circumstances spelled out below and with appropriate safeguards on your privacy:

**Employees, and Independent Contractors:** We may disclose information about you to our employees, and individuals who are our independent contractors that need to know the information in order to help us provide our Services or to process the information on our behalf. We require our employees, and independent contractors to follow this Privacy Notice for personal information that we share with them.

We may also request your consent to process limited elements of your data in specific ways. Where we require this consent, it will be presented to you in a way that allows you to have a clear understanding of what you are consenting to and enable you to agree to this in a clear and positive way.

**Sharing with Third Parties:** We may share information about you with third party vendors who need to know information about you in order to provide their services to us. This group includes vendors that help us provide our Services to you (like print and mailing providers). We require vendors to agree to privacy commitments in order to share information with them which becomes part of our contract with them and is in our Terms and Conditions – third party vendors and Clients agree to ensure that lawful grounds have been established and that all notices and consents are in place for any Personal Data that they ask Friend Studio to process on their behalf.

**As Required by Law:** We may disclose information about you in response to a subpoena, summons, court order, or other governmental request.

**To Protect Rights and Property:** We may disclose information about you when we believe in good faith that disclosure is reasonably necessary to protect the property or rights of Friend Studio, third parties, or the public at large. For example, if we have a good faith belief that there is an imminent danger of death or serious physical injury, we may disclose information related to this without delay.

**Business Sale or Transfers:** In connection with any merger, sale of company assets, or acquisition of all or a portion of our business by another company, or in the unlikely event that Friend Studio goes out of business or enters bankruptcy, user information would likely be one of the assets that is transferred or acquired by a third party. If any of these events were to happen, the new business owner(s) would be responsible for ensuring that all personal data to which this privacy notice relates, is handled in accordance with this privacy notice.

**Sale or Transfer:** If we're discussing selling or transferring part or all of a business, we may share information about you to prospective purchasers - but only so they can evaluate that business. If we are reorganised or sold to another organisation, we may transfer information we hold about you to them, so they can continue to provide the services to you.

## Security

We employ a range of security controls throughout our organisation to ensure that we look after your personal data and protect it from loss, corruption or unauthorised access. Our Information and Personal Data Security Policy which outlines our commitment to protecting your data can be supplied on request.

## Retention

We only retain data for as long as is necessary to satisfy the following requirements:

**Legal:** We are required to meet legal obligations in terms of retention periods for some data, such as financial records and information. (7 years for any document relating to financial transactions).

**Contractual:** Your data will be retained for the duration of your contract, as required by us to fulfil our contractual obligations. Following the end of the contract term we retain your information and a period of 18 months for marketing and business analysis purposes.

**Marketing:** Where data is held for marketing purposes then we hold this for 18 Months of inactivity prior to destruction.

**Business Analysis:** Where data is held for business analysis purposes, data is limited to only that necessary to perform the analysis. We retain business analysis data for 18 Months.

## Data destruction/erasure

We always aim to keep the amount of personal data we hold to a minimum and so, unless we have received a specific request from you to erase any of your data before the retention periods expire, we will either destroy or return to you any data that has reached the end of its retention period.

## Your choices

You have several choices available when it comes to information about you:

### Limit the Information that You Provide:

Please keep in mind that if you do not provide certain information, some features of our Services may not be available (contact us for more information).

### Opt-Out of Electronic Communications:

You may opt out of receiving promotional messages from us. Just follow the instructions in those messages. You may still receive messages as part of the fulfilment of our contractual obligations or legal notices, if you also decide to opt out of these this could result in a significant reduction of service you obtain from us in the fulfilment of these obligations.

# Who we are and what this notice covers continued

## Your rights

When it comes to personal data you have defined rights regarding how your data is collected, processed and shared. These rights are explained below:

**The right of access:** You have the right to request that we show you what personal data of yours we hold and process.

**The right to erasure:** In specific circumstances, you have the right to request that any data we hold on you be erased. This includes where:

- Your Personal Data is no longer necessary in relation to the purpose for which it was originally collected/processed.
- You withdraw consent.
- You object to the processing and there is no overriding legitimate interest for continuing the processing.

**The right to object:** There are cases where we may process some of your data in order to help us assess and improve our business. This type of processing may not be supported by a contractual requirement or your consent but would have been carefully assessed to ensure that we have a clear legitimate interest in doing so that does not adversely affect you as an individual.

In these instances, we make you aware of these activities along with your right to object to this kind of processing should you wish.

**The right to rectification:** If you become aware that any data we hold is incorrect you have the right to request that this data be corrected.

**The right to data portability:** You have the right to request that we provide you with an electronic copy of any data you have given to us as part of a contractual relationship or following your consent. This also includes any data about you that has been generated automatically as part of these agreements.

**The right to restrict processing:** In some situations, you may require us to restrict processing, such as following an objection or if data accuracy is in question. Where you exercise your right to restrict processing we shall not recommence processing without first notifying you.

## Other things you should know

### Transfer of information outside of the UK/EEA

From time to time, we may transfer your personal information to our suppliers or service providers based outside of the UK/EEA for the purposes described in this Privacy Notice. If we do this, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

1. We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: [Adequacy of the protection of personal data in non-EU countries](#).
2. Where personal data transfers to the UK from the EU, in line with the [EU-UK Trade and Cooperation Agreement \(TCA\) dated 24th December 2020](#), and until the date on which an adequacy decisions in relation to the UK are agreed, the transfer shall be permitted and shall not be considered as a transfer to a third country under EU law.
3. Where we use suppliers and service providers based in the US, we will only transfer data to them if they prove they abide by, and process EU Data in compliance with the SCCs (Standard Contractual Clauses) For more information [Standard Contractual Clauses \(SCCs\)](#).

### Data Protection Registration

Friend is registered with the Information Commissioner's Office (ICO). This means we are contractually committed to delivering our services in compliance with the Data Protection Act (DPA).

ICO Registration Number: ZA376959

## Complaints

If you have any complaints about the way in which your personal data is being handled, then please contact us using the contact details below.

To contact Friend about your personal data, you may contact the data processing office (DPO) at:

Friend Studio Limited  
11a Branch Place, London N1 5PH

### Addressed to our Data Protection Officer

Or call on 020 7749 2800

Or email directly at  
dataprotection@friendstudio.com

Alternatively, in the event that you feel we have not responded to you in a timely fashion or have not fully responded or complied with your requests you may also contact the national supervisory authority to register a complaint, their details can be found at <https://ico.org.uk>.

**This Privacy Notice was last reviewed on the 31/01/2021.**



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# Thank you

