

PRIVACY NOTICE

Who are we?

We are Creative Network Consulting Limited, registered in England & Wales, with company number 07695745 and with registered office at 57 Southwark Street, London, England, SE1 1RU.

This Privacy Notice sets out the basis on which we may collect, use, disclose and/or otherwise process your personal data in connection with and/or for the purposes of our operations. Please read this Privacy Notice carefully as it sets out how we use your personal data and the rights you have relating to that use.

Creative Network Consulting Limited is the “controller” of your personal data, which means we are responsible for your personal data and determining how it is used. In this Privacy Notice Creative Network Consulting Limited is collectively referred to as “Creative ITC”, “we”, “us” or “our”.

If you have any questions about this Privacy Notice, please contact us using the details set out below.

Contact details:

- Name of Data Protection Officer: Rachael Haywood
- Email address: dataprotection@creative-itc.com
- Postal address: The Techno Centre, Coventry University Technology Park, Puma Way, Coventry, CV1 2TT
- Telephone: +44 (0)2076 822 820

Purpose of this Privacy Notice.

To comply with applicable data protection laws, including the UK GDPR and Data Protection Act 2018 (the “Data Protection Legislation”), Creative ITC must ensure that individuals are fully aware of the way their personal data is processed, why and how it’s being used, and how long it will be kept. The purpose of this Privacy Notice is therefore to make it easier for you to understand how we use and protect your personal data, and how you can get in touch with us if you need to.

Please note that we have a separate Recruitment Privacy Notice, which can be found here:

<https://www.creative-itc.com/recruitment-privacy-notice/>.

Personal data we collect about you.

Personal data is any information about an individual from which that person can be identified. It does not include data where the identity of an individual has been removed (anonymous data). We may collect, use, store, transfer and otherwise process different kinds of personal data about you, as set out below.

- **Information you give us.** This is information about you that you give us by filling in “contact us” forms on our website (www.creative-itc.com, www.creative-group.tech or www.vdipod.com, giving us information via our chat box, or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our site (if registration is necessary), join any of our mailing lists, or if you report a problem with our site. The information you give us may include your name, address, e-mail address and phone number, personal description, or any other data which identifies you.
- **Information we collect about you.** With regard to each of your visits to our site 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, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
 - Information about your visit, including the full URL, clickstream to, through and from our site (including date and time), products/services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page and any phone number used to call our customer service (+44) (0) 845 533 2186.

Information we receive from other sources. This includes professional details (name, job title, business email) that we purchase or license from a third-party provider for marketing purposes. This also includes information we receive about you if you use any of the other websites we operate or the other services we or our affiliates provide. In this case we (or our affiliate) will have informed you when we collected such data for what purpose we will share it.

- We do not knowingly 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).

Cookies

We may receive information from cookies and/or other tracking technologies. Cookies are pieces of data your browser stores and sends back to us when making requests. We use this information to improve your experience, understand user activity and improve the quality of our services. Please see our [Cookie Notice](#) for more information about how we use cookies. Please note that we don't use cookies on our www.creative-group.tech website.

How do we use your personal data?

We collect, use, store and transfer your personal data for a number of different purposes. By law we are required to have a lawful basis for processing your personal data. We process your information on the following legal bases:

- You have consented for us to do so for a specific purpose.
- 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.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email, or for the use of non-necessary cookies on our website. You have the right to withdraw consent to marketing at any time by contacting us.

In the table below, we have set out a description of all the ways we may use your personal data, 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 data for more than one lawful ground depending on the specific purpose for which we are using your data. 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	Lawful basis for processing including basis of legitimate interest
To respond to any enquiry you make through the “get in touch” form of our website, or through our website chat box, or any other enquiry you make (whether by email, telephone, social media or otherwise), including requests for information or requests for proposals.	Necessary for our legitimate interests (to respond to your enquiry).
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy notice.	(a) Performance of a contract with you.

(b) Asking you to leave a review or take a survey.	(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 products/services).
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise). (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.	(a) 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). (b) Consent.
To make suggestions and recommendations to you about goods or services that may be of interest to you.	Necessary for our legitimate interests (to develop our products/services and grow our business)

Who do we share your personal data with?

We may disclose your personal information to the third parties set out below:

- In cases where we sell or negotiate to sell Creative ITC to a buyer or prospective buyer, in which case personal data held by us about our clients will be one of the transferred assets. This would also be the case for any proposed or actual merger, joint venture or other type of acquisition or business combination of all or any portion of Creative ITC assets, or transfer of all or a portion of Creative ITC's business to another company.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or to protect the rights, property, or safety of Creative ITC's customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- To professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance, accounting or other similar services.

Marketing

We may use your personal data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and, in each case, you have not opted out of receiving that marketing.

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

International Transfers

We may share your personal data with Creative affiliates based outside of the EEA. This will involve transferring your data outside the European Economic Area (EEA).

We will always ensure adequate protection for the transfer of data to countries outside the EEA and outside the United Kingdom, for example by entering into EU standard contractual clauses and required additional safeguards with the recipient.

You may request more information about the safeguards that we have put in place in respect of international transfers of personal data by contacting us at dataprotection@creative-itc.com.

How do we keep your personal data safe?

All information you provide to us is stored on our secure servers. Unfortunately, the transmission of information via the internet is not completely secure, and although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site - any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

How long do we keep your personal data?

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.

For further information about retention periods, or to view our retention policy, please contact us at: dataprotection@creative-itc.com.

Your rights

Under the Data Protection Legislation, you have rights in respect of your personal data, and these depend on the reason why we are processing your information. These rights are the rights to:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with applicable law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to 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.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is

unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. 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 products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Please contact us at dataprotection@creative-itc.com (or by using any other of the contact methods detailed at page 1 of this Privacy Notice) if you'd like to exercise any of the rights set out above.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

How to complain

We take our responsibilities in relation to personal data very seriously, so please contact us at dataprotection@creative-itc.com (or by using any other of the contact methods detailed at page 1 of this Privacy Notice) if you have any queries or concerns about how we are processing your personal data.

You can also contact the Information Commissioners Office at www.ico.org.uk, by writing to them at Wycliffe House Water Lane, Wilmslow, Cheshire, SK9 5AF or by phone on 0303 1231113 for further information or advice, or if we have not addressed your concerns and you would like to make a complaint.