



Privacy Policy

1. Purpose of this policy

This privacy policy aims to give you information on how we collect and process your personal data. It is intended to cover all data collection activities we undertake such as when we make contact with clients, potential clients and when you use our website.

It is important that you read this privacy policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you. This privacy policy supplements the other policies and notices and is not intended to override them.

Data controller

4Deal Studios Ltd, incorporated and registered in England and Wales with company number 14388068 whose registered office is at Forfar House, 97 Balham Park Road, London SW12 8EB, is the controller and responsible for your personal data ("**we**", "**us**" or "**our**" in this privacy policy).

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us at info@4dealstudios.com.

2. Information we collect

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (that is 'anonymous data').

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data**, which includes first name, last name or used name.
- **Contact Data**, which includes email address and phone number.
- **Social Media Data**, which includes usage and analytics.
- **Usage Data**, which includes information about the times and dates of login to our website as well as click, mouse movements and key presses and other information about how you use our website.
- **Marketing and Communications Data**, which includes your preferences in receiving marketing and your communication preferences.

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.

We do not 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). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to create a digital tombstone for your business).

3. How is data collected

We use different methods to collect data from and about you including through:

- **Information you give us.** This is information about you that you give us by corresponding with us by phone, e-mail or otherwise.
- **Information we collect about you through your use of our website.** We may 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 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, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page.
- **Information we receive from other sources.** We may receive personal data about you from various third parties including for example, social media platforms or third-party individuals.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal information:

- to carry out our obligations arising from any contracts entered into between you and us or to take steps at your request before entering into any contracts;
- to comply with any legal obligations to which we are subject; or
- where it is necessary for our or a third party's legitimate interests, including for the purposes of preventing fraud but except where such interests are overridden by your interests or fundamental rights and freedoms.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of the ways we plan to use your personal data and which of the legal bases we rely on to do so.

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	Type of data	Lawful basis for processing including basis of legitimate interest
To provide the digital tombstone services to you	Identity and contact data	Performance of a contract with you
To enter into a contract with you in relation to the provision of services	Identity and contact data	Performance of a contract with you
To manage our relationship with you which will include notifying you about changes to our terms or privacy policy	Identity, contact, and marketing data	(a) Performance of a contract with you (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 services)
To use data analytics to improve our website, services, marketing, customer relationships and experiences	Usage data Social Media Data	Necessary for our legitimate interests (to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	Identity, contact, usage, and marketing data	Necessary for our legitimate interests (to develop our services and grow our business)

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

5. Disclosure of your information

We may have to share your personal information with the third parties set out below, or any other third parties notified to you, for the purposes set out in section 4 above:

- Our suppliers of frames and our delivery couriers.
- Our IT, host and support services suppliers.
- Professional advisers including lawyers, bankers, auditors and insurers based in the UK.
- Regulators and other authorities who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer or move parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

We do not transfer your personal data outside the UK.

7. Where your personal data is held

Your personal data may be held at our offices or third parties like Wix.com or confidential Google drives, as well as on our electronic systems.

8. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We also 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.

However, the transmission of information via the internet is never completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted via internet; any transmission is at your own risk.

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.

9. Retention

We will only retain your personal information for as long as is legally necessary to carry out the purpose for which it was collected, 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.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

10. Your rights

Under certain circumstances, you have rights under the data protection laws in relation to your data.

If you wish to exercise any of the rights above, please contact us.

- **Request access** to your personal data (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 local 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; and (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 services to you. We will advise you if this is the case at the time you withdraw your consent.

11. Concerns

If you have any complaints relating to our privacy policy or our use of your personal data, please contact us.

You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.