

rebellion

GDPR: Data privacy notice for Clients and Suppliers from Rebellion London Limited

Introduction

This privacy policy explains how Rebellion London Limited uses any personal information we collect about you when you use our website or contact us by phone, email or other correspondence. This policy outlines what information we collect, how it is stored and what it is used for. It is our policy not to use any personal information for any purpose other than which it is intended to conduct our business and provide you with creative, consultancy and design services.

This policy and the provisions of the General Data Protection Regulations (GDPR) are designed to protect individual's information. Business contacts and information are considered to be in the public domain and therefore not covered. The GDPR is in force from 25th May 2018.

Rebellion London Limited ("We") are committed to protecting and respecting your privacy. This policy together with our terms of business any other documents referred to herein, sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

1. Definitions

Data controller – A controller determines the purposes and means of processing personal data.

Data processor – A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person

Categories of data: Personal data and special categories of personal data

Personal data – The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories personal data – The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

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.

Third party – means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

Rebellion London Limited is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: Rebellion London Limited, 31 New Inn Yard, London, EC2A 3EY, United Kingdom.

For all data matters email gdpr@rebellion.london

3. The purpose(s) of processing your personal data

We use your personal data for the following purposes:

- a) To liaise on a day to day basis with our client point of contacts
- b) To enable us to administer account matters in relation to ongoing projects and contracts
- c) To enable us to provide creative, consulting, digital and design services to our clients
- d) To respond to requests from clients and briefs supplied to us
- e) To administer our finance, accounting and invoicing systems
- f) The supply of any services you request. This may include passing details to third party suppliers with whom we have negotiated or placed an order on your behalf and within the terms of any active non-disclosure agreement, or those appointed by you whom we have been asked to work with on your behalf
- g) To meet our legal and regulatory obligations
- h) Website usage information is collected using cookies.

With the exception of any external organisations listed below we will not sell or share any personally identifiable information collected by us to any third party:

- a. HM Revenue & Customs (as required by Law)
- b. QuickBooks
- c. Harvest (project management and timesheet logging software)
- d. Microsoft Office (including Outlook email software)
- e. Google Apps (including Gmail systems for email)
- f. Dropbox (secure, business cloud-based solution for file sharing and delivery internally).

We will retain all given information on the following basis:

All information required to administer our accounts system, including bank account details, are stored online with Santander (bank) and QuickBooks who have their own compliance processes to ensure the security of personal data. Software from providers including Google, Dropbox, Harvest – all of which are accessed securely by our team only and have their own compliance processes to ensure the security of personal data.

We do not collect personal information to use for in email marketing.

All other contact details and information may be retained indefinitely either on a local or cloud-based storage drive, or in paper form stored in locked cabinets or similar, as such time as a client ceases to retain our services or a contact wishes to no longer receive any contact from Rebellion London Limited.

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use to the website and to compile statistical reports on website activity.

4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data; Personal data; Client contact names, business telephone numbers and emails only

5. What is our legal basis for processing your personal data?

Our lawful basis for processing your general personal data:

- a. We may enter your details into our third party accounting service provided by QuickBooks and our nominated accountancy professional advisors.
- b. We hold information from suppliers in the interest of our clients to be able to provide services to them. We may also pass client information to a supplier in the discharge of our contracted obligation which we will notify to the client.

6. Sharing your personal data

- a. Your personal data will be treated as strictly confidential, and will be shared only with third parties responsible to enable the function of our business such as our accountant or HMRC.
- b. We keep your personal data for no longer than reasonably necessary in order to keep historical project information and/or related costs or matters of dispute arising from projects we have delivered. Once we cease a client/supplier relationship we will destroy all personal information after a period of 12 months. We may retain minimal information for historical accounting purposes.

7. Providing us with your personal data

We require your personal data as it is a requirement necessary to enter into a contract and allow us to perform our duties under reasonable client/supplier terms.

8. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

We do not transfer personal data outside the EEA.

9. Automated Decision Making

We do not use any form of automated decision making via a third party or software.

10. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

11. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on our website and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

12. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact our Data Protection Officer by emailing gdpr@rebellion.london

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioners Office on 03031231113 or via <https://ico.org.uk/global/contact-us/email/> or write to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.