



DIGITAL CONTENT AGENCY

## KOOK CONTENT

### PRIVACY POLICY

#### 1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors and service users; in this policy we explain how we will handle your personal data.
- 1.2 We will ask you to consent to our use of cookies in accordance with the terms of this policy when you first visit our website.

#### 2. Credit

- 2.1 This document was created using a template from SEQ Legal (<http://www.seqlegal.com>).

#### 3. How we use your personal data

- 3.1 In this Section 3 we have set out:
  - (a) the general categories of personal data that we may process;
  - (b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
  - (c) the purposes for which we may process personal data; and
  - (d) the legal bases of the processing.
- 3.7 We may process information contained in any enquiry you submit to us regarding products and/or services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant products and/or services to you. The legal basis for this processing is consent.
- 3.10 We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.
- 3.13 Please do not supply any other person's personal data to us, unless we prompt you to do so.

#### 4. Providing your personal data to others

- 4.1 We will not disclose your personal data to any third parties.

4.6 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject.

## 5. International transfers of your personal data

5.1 In this Section 5, we provide information about the circumstances in which your personal data may be transferred to [countries outside the European Economic Area (EEA)].

5.3 The hosting facilities for our website are situated in the United States of America. The European Commission has made an "adequacy decision" with respect to [the data protection laws of each of these countries. Transfers to each of these countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission.

5.5 You acknowledge that [personal data that you submit for publication through our website or services] may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

## 6. Retaining and deleting personal data

6.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

6.3 We will retain and delete your personal data as follows:

(a) **correspondence data** will be retained for *1 year* following *correspondence date*, at the end of which period it will be deleted from our systems.

6.4 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:

(a) the period of retention of **enquiry data** will be determined based on your consent.

6.5 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## 7. Amendments

7.1 We may update this policy from time to time by publishing a new version on our website.

- 7.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 7.3 We may notify you of changes to this policy by email.

## **8. Your rights**

- 8.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:
  - (a) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).
- 8.2 We may withhold personal information that you request to the extent permitted by law.
- 8.3 You may instruct us at any time not to process your personal information for marketing purposes.
- 8.4 In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

## **9. About cookies**

- 9.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 9.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 9.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

## **11. Cookies used by our service providers**

- 11.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

## **12. Managing cookies**

- 12.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to

version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

12.2 Blocking all cookies will have a negative impact upon the usability of many websites.

12.3 If you block cookies, you will not be able to use all the features on our website.

### **13. Our details**

13.1 This website is owned and operated by Kook Content

13.4 You can contact us:

- (a) using our website contact form;
- (b) by email, using [info@kookcontent.co.uk](mailto:info@kookcontent.co.uk)