

## **INTRODUCTION**

Infinity Incorporated Ltd is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect, use and store personal information about you during and after your business relationship with us, in accordance with the General Data Protection Regulation (EU 2016/679) (GDPR).

Infinity Incorporated Ltd is a "data controller". This means that we are responsible for deciding how we hold and use and store personal information about you. We are required under the GDPR to notify you of the information contained in this privacy notice.

We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using your personal information.

## **DATA PROTECTION PRINCIPLES**

We will comply with all relevant data protection law (including the GDPR). This requires that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

## **THE KIND OF INFORMATION WE HOLD ABOUT YOU**

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

There are also "special categories" of sensitive personal data which require a higher level of protection.

We may collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, address, telephone numbers, personal/business email addresses and IP address.
- Payment card information when you purchase our products or services All payment card processing is undertaken by a third party. We use Sagepay. Their privacy policy can be viewed here <https://www.sagepay.co.uk/policies/privacy-policy>
- Order details – products that you have ordered or quotes
- CCTV footage
- Information about your use of our information and communications systems.

## **HOW YOUR PERSONAL INFORMATION IS COLLECTED**

We typically collect personal information about you via our website ([www.creativeemporiumonline.co.uk](http://www.creativeemporiumonline.co.uk)), cookies, enquiry and quotation forms and login pages when using one of our LINK websites (for clients who have their own bespoke merchandise/clothing website). We may sometimes collect additional information from third parties including data providers.

## **HOW WE WILL USE INFORMATION ABOUT YOU**

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

1. Where we need to perform the contract we have entered into with you.
2. Where we need to process the orders that you have placed with us
3. Where we need to administer your account with us.
4. Where we seek your views on the products and services that we provide.
5. Where we need to notify you of changes to our products and services.
6. Where we send you information about other products or services that you have specifically requested from us.
7. Where we need to comply with a legal or regulatory obligation.
8. We may need to process a job application or respond to an enquiry about a possible job with us.
9. 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.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest or for official purposes.

## **SITUATIONS IN WHICH WE WILL USE YOUR PERSONAL INFORMATION**

We need all the categories of information detailed in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal and regulatory obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

- Administering the contract we have entered into with you and providing our products and services to you
- Business management and planning, including accounting and auditing
- Making arrangements for the termination of our contracting relationship.
- Dealing with legal disputes involving you, or any disputes that may arise under the contract that we have with you or the way in which we provide our products and services to you.
- To prevent fraud
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

## **IF YOU FAIL TO PROVIDE PERSONAL INFORMATION**

If you fail to provide certain personal information when requested by us, we may not be able to perform the contract we have entered into with you (such as providing you with our services or guarantees), or we may be prevented from complying with our legal obligations (such as financial and tax reporting and insurance maintenance).

## **CHOICES YOU HAVE WITH YOUR PERSONAL INFORMATION**

You have a choice about whether or not you wish to receive information from us. If you do not want to receive direct marketing communications from us about the work we do and our exciting products and services, then you can select your choices by ticking the relevant boxes situated on the registration/enquiry form on our website.

We will not contact you for marketing purposes by email, phone or text message unless you have given your prior consent. We will not contact you for marketing purposes by post if you have indicated that you do not wish to be contacted. You can change your marketing preferences at any time by contacting us by email: [info@creativeemporium.co.uk](mailto:info@creativeemporium.co.uk)

## **CHANGE OF PURPOSE**

We will only use your personal information 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 we need to use your personal information for an unrelated purpose, we will notify you in writing and we will explain the legal basis which allows us to do so.

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

## **HOW WE USE SENSITIVE PERSONAL INFORMATION**

"Special categories" of sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information.

We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations and in line with our Data Protection policy.
3. Where it is needed in the public interest and in line with our Data Protection policy.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

## **DO WE NEED YOUR CONSENT?**

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights [in the field of [providing contracted services/products to you]. In limited circumstances, we may approach you for your written consent to allow us to process sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

## **COOKIES**

Like many other websites, [www.creativeemporiumonline.co.uk](http://www.creativeemporiumonline.co.uk) (needs to be changed per site) website uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, we use cookies to [store your country preference]. This helps us to improve our website and deliver a better more personalised service.

It is possible to switch off cookies by setting your browser preferences. For more information on how to switch off cookies on your computer, visit [our full cookies policy]. Turning cookies off may result in a loss of functionality when using our website.

## **DATA SHARING**

We may have to share your data with third parties (listed out in the next section), including third-party service providers [and other entities in the group]. We require third parties to respect the security of your data and to treat it in accordance with the law and we will have a contract in place with each of these third parties to ensure the protection of your personal information.

### **Why might you share my personal information with third parties?**

We may share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

### **Which third-party service providers process my personal information?**

"Third parties" includes third-party service providers (including contractors and designated agents) [and other entities within our group]. The following activities are carried out by third-party service providers:

- Payroll
- Pension
- Administration
- Benefits provision and administration
- HR services
- IT services

### **How secure is my information with third-party service providers and other entities in our group?**

All our third-party service providers [and other entities in the group] are required to take appropriate security measures to protect your personal information in line with our policies and this is supported by a contractual agreement with clear obligations on the third parties. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our written instructions.

### **When might you share my personal information with other entities in the group?**

We will share your personal information with other entities in our group [as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data

### **What about other third parties?**

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

## **DATA SECURITY**

We have put in place appropriate technical and security measures to protect the security of your personal information. Details of these measures are available upon request. Third parties will only process your personal information on our written instructions and where they have agreed to treat the information confidentially and to keep it secure as part of their contractual arrangement with us.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, workers, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures are available upon request.

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

## **DATA RETENTION**

### **How long will you use my information for?**

We will only retain your personal information 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. Details of retention periods for different aspects of your personal information are available in our retention policy and are available upon request. 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 information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a customer of the company we will retain and securely destroy your personal information in accordance with our data retention policy or current applicable laws and regulations.

## **RIGHTS OF ACCESS, CORRECTION, ERASURE AND RESTRICTION**

### **Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

## **Your rights in connection with personal information**

### **Under certain circumstances, by law you have the right to:**

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information 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.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact your Manager in writing.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

### **What we may need from you**

We may need to request specific information, such as a certified copy of your passport, from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### **Right to withdraw consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our [Data Protection Officer/Advisor/Manager] in writing. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

### **Right to complain**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

### **DATA PROTECTION OFFICER**

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact [info@creativeemporium.co.uk](mailto:info@creativeemporium.co.uk)

### **CHANGES TO THIS PRIVACY NOTICE**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact [info@creativeemporium.co.uk](mailto:info@creativeemporium.co.uk)