

COOKING VINYL GROUP PRIVACY NOTICE

This Privacy Notice sets out the basis on which we will process the personally identifying information (“Personal Data”) that we collect and receive from and about users of our website - www.cookingvinyl.com - (“the Site”) and customers who subscribe to our newsletters.

Our Privacy commitments

- We will only collect, keep, use and share Personal Data for legitimate business purposes that we explain below or if we are legally required to do so.
- We will be clear and open with you on what Personal Data we collect and how it will be processed.
- For as long as we maintain records of your Personal Data, we will keep it up to date and protect it with appropriate safety measures.

Website Visitors

Data Collection

We collect the following Personal Data about you if you visit our Site: site referrals, browsing pattern, browser type, location, general interests, gender, age. The data transmitted from your browser includes your IP address, the date and time of the visit, the pages accessed, the access status/HTTP status code, your browser, your operating system and interface, as well as the language and version of the browser software. Our legal basis for collecting and processing this Personal Data is our legitimate interest in operating the Site, providing you with access to the pages you wish to access, understanding the interests of our potential customers and providing you with relevant information about our services.

Data Uses

We use this Personal Data:

- To provide you with bespoke website content (for example by analysing our site visitors’ age ranges).
- To gain insight into your behaviour and preferences (for example by analysing the website pages you visit).
- To create bespoke marketing messages (for example by analysing the click through on our Site).
- To retarget our website visitors with relevant marketing messages (for example by using cookies hosted on our Site).
- To collect site statistics.

For more information on cookies please see our Cookie Statement at www.cookingvinyl.com/cookie-policy

Mailing List Subscribers

We collect the following Personal Data about you if you sign up to subscribe to our newsletters: first name, last name, email address, age, country of residence. Our legal basis for collecting and processing this Personal Data is our legitimate interest in providing you with relevant information about us and our artists.

Data Uses

We use this Personal Data:

- To find out more about our digital community (for example by analysing the age ranges and countries of residence of our followers)

Social Media Followers

Data Collection

We receive the following Personal Data about you if you follow one of our social media accounts: your account name, gender, general interests, location, age. Our legal basis for collecting and processing this data is our legitimate interest in providing social media and marketing content that is of interest to our followers on social media.

Data Uses

We use this Personal Data:

- To provide you with bespoke social media content (for example by analysing your general interests).
- To create targeted advertising across all our social media channels (for example by analysing responses to posts and existing advertisements).
- To find out more about our digital community (for example by analysing the age ranges of our followers).

The Site, our newsletters and other communications from us may, from time to time, contain links to and from the websites and social media sites of our artists. If you follow a link to any of these websites or social media sites, please note that these websites and social media sites have their own privacy policies and that we do not accept any responsibility or liability for these policies.

Data Processors

We use third party processors to collect, export, process and store Personal Data on our behalf. The processors we use currently and their respective privacy statements are the following:

- 1 CRM Tool: Mailchimp (<https://mailchimp.com/legal/privacy/>), Mad Mimi (<https://uk.godaddy.com/Agreements/Privacy.aspx>)
- 2 Cloud Storage: Google Drive (<https://cloud.google.com/security/compliance/eu-data-protection/>)
- 3 Social Media Platform: Twitter, Facebook, Instagram, Google, YouTube
- 4 Web Management Tools: Google Analytics (<https://www.google.com/policies/privacy/>)

International Data Transfers

We use data processors located outside the European Economic Area only after taking such steps as are required to ensure that Personal Data they process on our behalf receives protection equivalent to that provided in the EEA. Our processors are either certified as compliant with the EU-U.S. Privacy Shield Framework where they are located in the USA or have entered into an agreement with us containing the model clauses approved by the European Commission as providing contractual protection equivalent to that provided by the data protection regulations applicable in the EEA. To learn more about the Privacy Shield Framework, please visit <http://www.privacyshield.gov>.

Data Security

- We maintain technical and physical safeguards that are designed to protect the security and integrity of your Personal Data, and to guard it against accidental or unauthorised access, use, alteration or disclosure to unauthorised third parties. These measures include device encryption, firewalls and virus checking procedures.
- Where we keep Personal Data files on local devices these devices are protected and accessible only to authorised Cooking Vinyl Group employees.
- We regularly review our security systems to ensure that your Personal Data remains safe and secure.

Duration of Storage

We will maintain records of your Personal Data for as long as:

- You remain a registered subscriber to our mailing list.
- You remain a user of our Site.
- It is necessary for us to provide our services to you.

If you have not opened any email communication from us or in any other way interacted with us for 26 months we will regard you as an inactive subscriber and delete your details from our records except where retention is necessary to enable us to enforce our legal rights or to protect the rights, property or safety of our employees.

Data Sale & Data Sharing

We will not sell your Personal Data nor will we share your Personal Data with any third party except as stated below or elsewhere in this Privacy Notice or as required to operate the Site, provide our services to you and administer your account.

We will share your Personal Data with social media sites to enable them to provide marketing messages that you have agreed to receive from them. The social media sites we share your Personal Data with as at the date of this Privacy Notice and their respective privacy statements are:

- Facebook (<https://www.facebook.com/privacy/explanation/>)
- Instagram (https://help.instagram.com/519522125107875?helpref=page_content)

Your rights in relation to Personal Data

- You can update your subscription preferences or unsubscribe from our marketing communications at any time by following the link in the footer of the last email you received from us or by sending your request to our Data Privacy officer.
- You have the right to update and correct the Personal Data that we hold about you.
- You have the right to request from us the Personal Data that we hold about you, to request restriction of the processing of that data and to request that we delete that data. Where allowed by applicable law there may be an administrative charge for supply of copies of your Personal Data and we may also require you to provide us with appropriate identification before we comply with this request.
- You have the right to object to the continued processing of your personal data.
- You may also have the right to data portability.

If you have a complaint about the way in which we use your Personal Data you have the right to complain to the Information Commissioner (www.ico.gov.uk).

Changes to our Privacy Notice

We will update this Privacy Notice from time to time to reflect changes in our business. All such changes will be posted to the Site and if we consider it to be appropriate we will notify subscribers of any material changes by email.

Contacting us

Cooking Vinyl Limited is the Data Controller in respect of any Personal Data that you submit to us or that we collect from or about you.

We are a limited company registered in England and Wales (registered no. 02045353) with its registered office at 12-13 Swainson Road, London W3 7XB.

If you would like to know what information we hold about you or if you have any other queries or complaints in relation to this Privacy Notice or our Site our contact details are as follows:

- The Data Privacy Officer, Cooking Vinyl Limited, 12-13 Swainson Road, London W3 7XB
- DataPrivacy@cookingvinyl.com
- 020 8600 9206

Date: 25th May 2018