
PRIVACY STATEMENT

BACKGROUND:

Make Marketing Magic understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone we work with or provide services to and only collect and use your personal data as described in this Privacy Statement. Any personal data We collect will only be used as permitted by law.

Please read this Privacy Statement carefully and ensure that you understand it. Your acceptance of this Privacy Statement is requested when you enter into any contractual relationship with us.

1. Information About Us

We are Make Marketing Magic Ltd, a limited company registered in the United Kingdom and registered with Companies House under company number 12270127.

Our registered office is: Suite A, 4-6 Canfield Place, London, United Kingdom, NW6 3BT

Data Protection Officer: Geoff Sutton

Email address: info@makemarketingmagic.com

Postal address: Suite A, 4-6 Canfield Place, London, United Kingdom, NW6 3BT

2. What Does This Policy Cover?

This Privacy Statement applies to any information shared between Us and you to facilitate the delivery of any services by Us to you pursuant to a written contract for services or through your use of Our website. This Privacy Statement does not apply to third-party websites, including those referred to by Us on our website or email communications.

3. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about a person that enables them to be identified. Personal data covers obvious information such as a name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

4. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which We will always work to uphold:

- a) The right to be informed about Our collection and use of personal data. This Privacy Statement should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in

Part 11.

- b) The right to access the personal data We hold about you or any representative of your organisation. Part 9 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that We hold. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about Our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data We hold about you changes, please keep us informed as long as We have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about Our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves however, so please contact us first, using the details in Part 11.

5. What Personal Data Do You Collect and How?

We may collect the following information about you:

- Information when you create an account: we will collect information such as your email address and telephone number, name, address and your account details such as log-in credentials;
- Financial Information: If you enter into a contract with Us, we will collect your bank details for financial settlement;
- Analytics Information: We may collect information such as your IP address, traffic and location data and information about your use of Our website;
- If you send us an email, We may collect your name, your email address, and any

other information which you choose to give us.

The lawful basis under the Data Protection Legislation that allows us to use such information is article 6(1)(f) of the GDPR which allows us to process personal data when it is necessary for the purposes of Our legitimate interests, in this case, the delivery of services to you pursuant to a contract. If you contact us as described above, you will be required to consent to Our use of your personal data to contact you. In this case, Our lawful basis for using your personal data will be article 6(1)(a) of the GDPR, which allows us to use your personal data with your consent for a particular purpose or purposes.

6. How Do You Use My Personal Data?

All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 7, below.

Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:

- a) Providing and managing your Account;
- b) Providing and managing your access to Our Site;
- c) Personalising and tailoring your experience on Our Site;
- d) Supplying Our products to you (please note that We require your personal data in order to enter into a contract with you);
- e) Personalising and tailoring Our products for you;
- f) Replying to emails from you;
- g) Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by selecting the 'unsubscribe' option on the emails);
- h) Market research; and
- i) Analysing your use of Our Site and gathering feedback to enable Us to continually improve Our Site and your user experience.

With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email with information, news and offers on Our products and services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.

7. How and Where Do You Store My Data?

We will only store your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the Data Protection Legislation, the

GDPR, and/or to equivalent standards by law.

Personal data security is essential to us, and to protect personal data, We take the following measures:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality; and
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so.

8. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions:

We may sometimes contract with third parties to supply products and services to you on Our behalf. These may include payment processing, search engine facilities, advertising, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.

We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.

If We sell, transfer, or merge parts of Our business or assets, your personal data may be transferred to a third party. Any new owner of Our business may continue to use your personal data in the same way that We have used it, as specified in this Privacy Statement (i.e. to communicate with you).

In some limited circumstances, We may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

9. How Can I Access My Personal Data?

If you want to know what personal data We have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover Our administrative costs in responding.

We will respond to your subject access request within 20 days, in any case, not more than

one month of receiving it. Normally, We aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date We receive your request. You will be kept fully informed of Our progress.

10. Our Use of Cookies

Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our products. In addition, Our Site uses analytics services provided by Google which also use Cookies. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling Us to better understand how people use Our Site. For more details, please refer to Our Cookie Policy.

11. How Do I Contact You?

To contact **Us** about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Geoff Sutton

Email address: info@makemarketingmagic.com

Postal Address: Suite A, 4-6 Canfield Place, London, United Kingdom, NW6 3BT

12. Changes to this Privacy Statement

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if We change Our business in a way that affects personal data protection and any updates will be communicated to you.