



**LOOP**

## PRIVACY POLICY

**Who we are:** We are Loop (a company registered in England and Wales), whose registered office is at 40A Elm Grove, London, N8 9AH – also referred to in this policy as 'we', 'us' and 'Loop'.

**Our values and what this policy is for:** We value your privacy and want to be accountable and fair to you as well as transparent with you in the way that we collect and use your personal information for legitimate business interests. We also want you to know your rights in relation to your information

In line with these values, this privacy policy tells you what to expect when we collect and use personal information about you.

**Who this policy applies to:** This policy applies to:

- Visitors to our website
- Business and contacts

Depending on our relationship with the individual, we will collect and use your information in different ways.

**Your rights to object:** You have various rights in respect of our use of your personal information. Two of the fundamental rights to be aware of are that you may:

- ask us to stop using your personal information for legitimate business purposes. If you exercise this right, we will stop using your personal information for this purpose;
- ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our, or another person's, legitimate interest.



### **Personal data collected from you:**

For the purposes of applicable data protection law (including, the General Data Protection Regulation 2016/ 679 (the "GDPR"), we are a 'data controller' of your personal data.

The following categories of personal data will be collected about you in connection with your interaction with us about the work we do and the clients we represent, including but not limited to identifying your name, occupation and contact via an industry database or subscription; direct enquiries through the contact form on the company website [www.loopvip.co.uk](http://www.loopvip.co.uk); sharing of business cards/work contact information in meetings or at industry events; via introductions from third parties; identifying companies and contacts via social media platforms and search engines.

- Personal Identification Information: such as, your name.
- Contact Information: such as, your email address, postal address, postcode and telephone number;
- Preference Information: such as, information about areas you cover or interests in your line of work.
- Your marketing preferences, including any consents you have given us.

In addition, if you contact us by phone, email or otherwise, we may keep a record of that correspondence on file for as long as that information is necessary.



## THE DETAIL

### **1. How we obtain your personal information**

1.1 You may provide us with your personal information voluntarily. However, we may also receive information about you from third parties such as databases and public websites, which we refer to as "third party sources" or "suppliers" throughout this policy.

1.2 You may give us personal data about yourself in the course of interactions with our staff (for instance if you give them your business card), when you fill in a form on our website or when you contact us by phone, e-mail or other means. If you contact us, we may keep a record of that correspondence

### **2. Visitors to our website**

(a) What personal information we collect about you

We collect and use technical information created and recorded automatically when you visit our website. This includes: The Internet Protocol (IP) address used to connect your computer to the internet address; the website address and country from which you access information; the files requested; browser type and version; browser plug-in types and versions; operating system; and platform. We use this personal information to administer our website, to measure the efficiency of our systems and to undertake an analysis of the locations from which people access our webpages;

(b) How we use your personal information

We will collect, use and store the personal information listed above for the following reasons:

- (i) to allow you to access and use our website;
- (ii) for improvement and maintenance of our website and to provide technical support for our website; and

#### 2.2 Business contacts

(a) We collect and use the following information about you:

- (i) your name;
- (ii) your business postal address;
- (iii) your business email address;
- (iv) your telephone number;
- (v) any information provided by you when you correspond with us.

(b) How we use your personal information



We will collect, use and safely store the personal information listed above for the purposes of contacting you in the normal course of doing business with you and/or your employer, dealing with any enquiries from you and also, for business development and marketing purposes.

2.3 Whatever our relationship with you is, we may also collect, use and store your personal information for the following additional reasons:

(a) to deal with any enquiries or issues you have about how we collect, store and use your personal information, or any requests made by you for a copy of the information we hold about you.

(b) for internal corporate reporting, business administration, ensuring adequate insurance coverage for our business, ensuring the security of company facilities, research and development, and to identify and implement business efficiencies. We may process your personal information for these purposes where it is in our legitimate interests to do so;

(c) to comply with any procedures, laws and regulations which apply to us – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others to comply, as well as where we are legally required to do so; and

(d) to establish, exercise or defend our legal rights – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others, as well as where we are legally required to do so.

## 2.4 Further processing

We will not use your personal information in any way that is incompatible with the purposes set out in this section 2.

## **3. Legal basis for use of your personal information**

3.1 We consider that the legal bases for using your personal information as set out in this privacy policy are as follows:

(a) our use of your personal information is necessary to perform our obligations under any contract with you (for example, to comply with the terms of use of our website which you accept by browsing our website); or

(b) our use of your personal information is necessary for complying with our legal obligations (for example, if you contact us requesting access to personal data we hold about you); or



(c) where use of your personal information is necessary for our legitimate interests or the legitimate interests of others. Our legitimate interests are to:

- (i) run, grow and develop our business;
- (ii) carry out marketing, market research and business development;
- (iii) provide services to our client.
- (iv) track and ensure our databases are accurate and relevant.
- (v) carry out internal group administrative purposes.

3.2 If we rely on our (or another person's) legitimate interests for using your personal information, we will undertake a balancing test to ensure that our (or the other person's) legitimate interests are not outweighed by your interests or fundamental rights and freedoms which require protection of the personal information.

#### **4. How long we store your personal information**

4.1 We keep your personal information for no longer than necessary for the purposes for which the personal information is processed. The length of time we retain personal information for depends on the purposes for which we collect and use it and/or as required to comply with applicable laws and to establish, exercise or defend our legal rights.

4.2 Where you send in CV and cover letters for jobs/placements, we retain the personal information provided for 2 years.

#### **5. Your rights**

5.1 You have certain rights in relation to your personal information. If you would like further information in relation to these or would like to exercise any of them, please contact us via email at [info@loopvip.co.uk](mailto:info@loopvip.co.uk) at any time. You have the following rights:

(a) Right of access. You have a right of access to any personal information we hold about you. You can ask us for a copy of your personal information; confirmation whether your personal information is being used by us; details about how and why it is being used.

(b) Right to update your information. You have a right to request an update to any of your personal information which is out of date or incorrect.

(c) Right to request deletion of your information. You have a right to ask us to delete any personal information which we are holding about you in certain specific circumstances.



(d) Right to restrict use of your information: You have a right to ask us to restrict the way that we process your personal information in certain specific circumstances.

(e) Right to stop marketing: You have a right to ask us to stop using your personal information for direct marketing purposes. If you exercise this right, we will stop using your personal information for this purpose.

(g) Right to object. You have a right to ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our or another person's legitimate interest.

5.2 We will consider all such requests and provide our response within a reasonable period (and in any event within one month of your request unless we tell you we are entitled to a longer period allowed by applicable law). Please note, however, that certain personal information may be exempt from such requests in certain circumstances, for example if we need to keep using the information to comply with our own legal obligations or to establish, exercise or defend legal claims.

5.3 If an exception applies, we will tell you this when responding to your request. We may request you provide us with information necessary to confirm your identity before responding to any request you make.

## **6. Risks and how we keep your personal information secure**

6.1 The main risk of our processing of your personal information is if it is lost, stolen or misused. This could lead to your personal information being in the hands of someone else who may use it fraudulently or make public information that you would prefer to keep private.

6.2 For this reason, we are committed to protecting your personal information from loss, theft and misuse. We take all reasonable precautions to safeguard the confidentiality of your personal information, including through use of appropriate organisational and technical measures.

Organisational measures include, implementing internal policies and ensuring confidentiality obligations are imposed on our employees. Technical measures include requiring passwords for access to our systems.

6.3 In the course of provision of your personal information to us, your personal information may be transferred over the internet. Although we make every effort to protect the personal information which you provide to us, the transmission of information over the internet is not completely secure. As such, you acknowledge and accept that we cannot guarantee the security of your personal information transmitted online and that any such transmission is at your own risk. Once we have received your personal information, we will



use strict procedures and security features to prevent unauthorised access to it.

## **7. Changes to our privacy policy**

We may update our privacy policy from time to time. Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you in other ways (such as a prominent announcement on our website). Please check back frequently to see any updates or changes to our privacy policy.

## **8. Further questions and how to make a complaint**

8.1 If you have any queries or complaints about our collection, use or storage of your personal information, or if you wish to exercise any of your rights in relation to your personal information, please contact [tim@beaumontlondon.com](mailto:tim@beaumontlondon.com). We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your personal information.

8.2 In accordance with Article 77 of the General Data Protection Regulation, you may also make a complaint to the Information Commissioner's Office, or the data protection regulator in the country where you usually live or work, or where an alleged infringement of the General Data Protection Regulation has taken place. Alternatively, you may seek a remedy through the courts if you believe your rights have been breached.

The practices described in this privacy policy statement are current as of May 2018.



### **Actions for saving data**

- The way we collect and save data needs to be logged – initialled and dated by the person inputting the information. This applies but is not limited to each individual database and contact sheet the company uses for legitimate day-to-day business including but limited to Client Documents and Contacts, Company Contacts, Fashion, Beauty and Brand Databases, Guest Lists, Seeding documents and New Business Databases.
- We include a disclaimer in our email signature hyperlinking our privacy policy to the company website for all new correspondence.

### **How we manage data**

- We can track data entries easily and be transparent with individuals wanting to know how their data is stored,
- We make it easy for individuals to withdraw their data at any time, and publicise how to do so (made clear in our policy)
- We act on withdrawals as soon as we can and alert any other colleagues this may affect.
- We do not hold onto data for longer than is necessary i.e.
  - old databases that have been exported and saved for over two years.
  - old pitch lists for existing and previous clients that have been exported and saved for over two years.