

## General Data Protection Regulations

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Prepared on Tuesday, May 22, 2018

**Anim8 Productions Ltd**  
9, Kestrel Close, Watford, Herts, WD25 9AL

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# GDPR Policy

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## Introduction

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**Data protection and your privacy matter to us at Anim8 Productions Ltd. This document outlines our obligations under the new GDPR Act, and ensures that we treat your personal data with the utmost respect.**

The EU General Data Protection Regulation (GDPR) act reinforces the 1995 EU Data Protection Directive, strengthening the rights that individuals have regarding personal data.

We are committed to taking every step necessary to protecting your data, and have taken measures to ensure that privacy and security protections are built into the service(s) we provide to you.

This policy (together with our standard terms of use and any other documents referred to on it) outlines when and why we collect personal data, how we use it, and the conditions under which we may disclose it to others. It governs the manner in which Anim8 Productions Ltd ("we") collects, uses, maintains and discloses information we collect about individuals ("you"), and applies to all products and services that are offered by Anim8 Productions Ltd

Should you wish to discuss any part of our GDPR Statement with us, our details are at the bottom of this document.

**Anim8 Productions Ltd**

# Privacy - You Right to be Informed

An important part of the GDPR is the Right to be Informed about what information we have. The following data types are stored and used by Anim8 Productions Ltd as part of our normal business activities:

Data Type	Details	
<div style="border: 1px solid black; padding: 2px;">Email Addresses</div>	Purpose	<div style="border: 1px solid black; padding: 2px;">Customer Identification,</div>
	Retention Period	2 years
	Basis for Processing	Legitimate Interest
	Source	<div style="border: 1px solid black; padding: 2px;">Website, Social Media</div> Website Social Media Third-Party Data Existing Customer Business Card
Telephone Numbers	Purpose	Customer Identification, Marketing
	Retention Period	2 years
	Basis for Processing	<div style="border: 1px solid black; padding: 2px;">Legitimate Interest</div> Legitimate Interests Consent Contract Legal Obligations Vital Interests Public Task
	Source	<div style="border: 1px solid black; padding: 2px;">Website, Social Media</div> Website Social Media Third-Party Data Existing Customer Business Card
<div style="border: 1px solid black; padding: 2px;">Personal Addresses</div>	Purpose	Customer Identification, Marketing
	Retention Period	2 years
	Basis for Processing	<div style="border: 1px solid black; padding: 2px;">Legitimate Interest</div> Legitimate Interests Consent Contract Legal Obligations Vital Interests Public Task
	Source	<div style="border: 1px solid black; padding: 2px;">Website, Social Media</div> Website Social Media Third-Party Data

Existing Customer  
Business Card

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# Lawful Basis

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## Data

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### Lawful Reasons for Processing

CliqTo Ltd has a legitimate need to process and store your personal data. It is in our legitimate interest to provide you with the best possible service we can, to ensure that we meet your expectations, and if necessary, for marketing purposes. If you are not happy about this, in certain circumstances you have the right to object and/or the right to restrict processing.

- The individual has given clear consent for us to process their personal data for a specific purpose, e.g. fulfilling an order
- The processing is necessary for a contract we have with the individual
- It is necessary in order to comply with the law (not including contractual obligations)
- The processing is necessary for legitimate interests such as marketing, fraud prevention or IT security

### Whose Data do we Collect?

CliqTo Ltd needs to gather and use certain individuals in order to fulfill our obligations as an organisation. This policy describes how this personal data must be collected, handled and stored to meet our data protection obligations - and to comply with the law.

We only ask for information about you that helps us to help you, and we don't ask for any information that has no specific purpose.

We store information about:

- Customers
- Suppliers
- Business Contacts
- Contractors

### Personal Data Types

We store the following personal data about our staff and/or customers:

- Email Address
- Telephone Number
- Address
- Postcode
- Job Title
- Other (please state below)

### Sensitive Personal Information

CliqTo Ltd does not store any sensitive personal data about our staff or our customers.

### Criminal Offence Data

CliqTo Ltd does not store any criminal offence data about any individual.

## **The Ways we Collect Data**

CliqTo Ltd collects a limited amount of personal data to enable us to fulfil our contractual duties to you or to other organisations. Additional items of information may be needed to help us keep our relationship with you working smoothly.

In the event that you access our website, read an email, or click on a link in an email we send to you, we may also collect certain data automatically or through providing it to us, including data such as your IP address and cookies, the latter of which make your interaction with our website(s) smoother and more intuitive, providing you with a better, more customised experience.

We collect this information from the following sources:

- Directly from the individual
- From our website (including cookies)
- From individuals emailing us
- From the use of social media channels such as Facebook or Twitter

## **Third-Party Data**

CliqTo Ltd does not purchase or use data that has originated from a third-party source.

## **Sharing of Personal Data**

CliqTo Ltd does not share any personal data with any other organisation.

## **Children's Data**

CliqTo Ltd does not process any personal data of children under the age of 16.

## **Use of Data for Specific Purposes**

We may use the personal data you supply for our purposes where we deem it necessary in our legitimate interests.

We will need your consent for some of the activities that may not be covered by our legitimate interests, for example the collection of data via cookies and the delivery of direct marketing through digital channels such as email subscriptions. Where we need to obtain consent we do so in an open, transparent and clear way so that you know exactly what you are signing up for, why we need your information and how will intend to use it.

If you are not happy with the way we collect your personal data, you have several rights which you can exercise at any time. Please see the section on 'Your Rights' in this document.

We may use your personal information to help us to exercise or defend any legal claims that may arise.

Below are the ways that we may use and process your personal data, although please note that this list is not exhaustive.

- For carrying out our obligations and contracts with us and our customers
- To comply with our legal obligations, including crime, tax or duties
- For marketing purposes
- To send details of promotions, offers and events
- To communicate with individuals in the course of our business
- To enable us to develop and market other services and products
- To carry out satisfaction surveys and testimonial requests
- To conduct online training
- To facilitate our payroll and invoicing procedures

## Data Transfer

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### Data Portability

CliqTo Ltd does not transfer data out of the European Economic Area (EEA).

## Automated Decision-Making

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CliqTo Ltd does not profile any of our customers or staff for the purpose of marketing or advertising purposes.

## Consent

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### Explicit Consent

Information about individual's personal or sensitive information has been freely given by the data subject. We also take the following measures to ensure that we obtain explicit consent before using or storing their information:

- Consent was freely given at the point of purchase
- Consent was clearly distinguishable in an assessable, distinguishable manner
- We can demonstrate that the individual gave their consent
- Individuals have the ability to withdraw their consent at any time.

## Website Data Collection

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CliqTo Ltd may collect a limited amount of data from our website users which we use to help us to improve your experience when using our website, and help us to manage the services we provide.

We may also use data from your use of our websites to enhance other aspects of our communications (including marketing) with you. Any communications to and from CliqTo Ltd and you may be reviewed and monitored as part of internal or external investigations or for legal reasons as required to under law.

The data we collect may consist of the following information:

- IP Addresses
- Name
- Contact Details (including Email Address)

# Data Protection by Design

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- We integrate privacy and data protection compliance from the start of new projects

# Individual Rights

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## Right to Rectification

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- We have systems in place to identify and respond to rectification requests
- We have a policy in place for how to record requests we receive
- We understand that in certain cases we may refuse requests
- We respond to requests for rectification without undue delay, and within 1 month of receipt
- We may extend the time limit to respond to complex requests
- We have procedures in place to inform individuals if we rectify any data we have shared with them

## Right to Erasure

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- We have a policy for how to record requests we receive
- We are able to recognise a request for erasure, and understand when the right applies
- We may refuse a request, and will provide details to individuals when we do so
- We respond to a request for erasure without undue delay, and within 1 month of receipt
- We may extend the time limit to respond to more complex requests
- We place particular emphasis on the right to erasure if it relates to data collected from children
- We inform recipients if we erase any data we have shared with them
- We have appropriate methods in place to erase information

## Right to be Informed

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### Privacy Statement

You can request to see our Privacy Statement at any time, which outlines our obligations under the GDPR regulations. Our Privacy Statement includes the following:

- Name and contact details for our organisation
- Purposes of the processing
- Categories of personal data obtained (if not obtained from the individual)
- Recipients or categories of recipients of the personal data
- Details of transfers of the personal data to any third countries or international organisations (if app)
- Retention periods for the personal data
- Rights available to individuals in respect of the processing
- The right to withdraw consent (if app)
- Right to lodge a complaint with a supervisory authority
- The source of the personal data (if not from the individual)
- Whether individuals are under a statutory or contractual obligation to provide the personal data (if app, and if the data is collected from the individual)
- Details of the existence of automated decision-making (e.g. profiling)

## Right to Restrict Processing

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- We know how to recognise a request for restriction, and understand when the right applies
- We have a policy in place for how to record requests we receive
- We may refuse a request, and will provide details to individuals when we do so
- We respond to a request for erasure without undue delay, and within 1 month of receipt
- We may extend the time limit to respond to more complex requests
- We have systems in place to indicate that further processing has been restricted
- We have systems in place to inform any recipients if we restrict any data we have shared with them
- We inform individuals before we lift restriction on processing

## Right to Access

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- Individuals have the right to access their personal data
- A copy of the data can be provided free of charge
- We may charge a reasonable fee to comply with requests for further copies of the same information
- We will provide the information without delay, within one month of receipt of the request
- We may extend the period of compliance by an additional two months where requests are complex or numerous
- We may charge a reasonable fee if a request is manifestly unfounded or excessive
- We provide information in a commonly used electronic format
- We verify the identity of the person making the request using 'reasonable means'

## Right to Data Portability

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- We know how to recognise a request for data portability and we understand when the right applies
- We have a policy for how to record requests we receive verbally
- We understand when we can refuse a request and are aware of the information we need to provide to individuals when we do so
- We can transmit personal data in structured, commonly used and machine readable formats
- We use secure methods to transmit personal data
- We have processes in place to ensure that we respond to a request for data portability without undue delay and within one month of receipt
- We are aware of the circumstances when we can extend the time limit to respond to a request

## Right to Object

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- We will stop processing personal data upon receiving personal data
- If there are legitimate grounds which override the interests, rights and freedoms of the individual, we may refuse
- If the processing is for the establishment, exercise or defence of legal claims, we may

refuse

- We inform individuals of their right to object at the point of first communication
- We stop processing data for direct marketing right away, and without charge
- Personal data may be in the interest of a public interest task, and we may not be required to comply
- We offer a way for individuals to object online through our website

## Informing Us

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### Getting in Touch

As part of the GDPR obligations, you have various rights in relation to the personal data we store about you. We will seek to deal with any requests without undue delay, and in accordance with the requirements of the GDPR and applicable laws.

We may keep a record on file about your communications to us in order to help us to resolve further issues that may arise.

You also have the right to lodge a complaint with a supervisory authority. In the UK, this is the Information Commissioner's Office. They can be contacted in the following ways:

Phone: 0303 123 1113

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

## Informing Us

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### Getting in Touch

Post: ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

You are able to get in touch with us to exercise their legal rights about the personal information that CliqTo Ltd stores about them. They can do this in the following way(s):

- By writing to us at our registered address
- By emailing us

## Getting in touch with us

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You can exercise your rights at any time by getting in touch with us at the following address:

**Anim8 Productions Ltd**

9, Kestrel Close, Watford, Herts, WD25 9AL

Email: [neil@neilben.com](mailto:neil@neilben.com)

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# Security

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- We review our information security policies and measures at regular intervals
- We make improvements to our security policies wherever necessary
- We understand the requirements of confidentiality, integrity and availability for the personal data we process
- We can restore access to personal data in the event of the loss of data

## Security Measures

CliqTo Ltd has implemented adequate security measures to protect personal information from unlawful access, theft, disclosure or loss.

If you suspect an loss, unauthorised access or misuse of your personal information we hold about you, please let us know immediately. Our details can be found on this document.

The following measures have been implemented:

- Server maintenance
- Software version updates
- Data integrity and resilience
- Restoration of data in a timely manner

## Data Anonymisation

## CCTV and Cameras

CliqTo Ltd does not store personally-identifiable video or images from CCTV cameras, body cameras, unmanned aerial systems or other systems that capture information of identifiable individuals or information relating to individuals.

## Wifi and Remote Access

# Storage

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## Storage Location

- Emails
- Documents
- Databases
- Photographic

If CliqTo Ltd has no meaningful contact with you (or, our partners) for a total period of time as outlined below, we will delete the personal data we store about you from our systems, unless we have reason to believe that laws require CliqTo Ltd to retain it, including any anticipated legal action.

We delete personal data from our systems after the following period of inactivity:

- We delete personal data from our systems after a set period time of 'inactivity'
- We delete personal data from our systems after (please state below):

# Data Breaches

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## Breach Identification

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- We have allocated responsibility for managing breaches to a dedicated person or team

### Data Breach Procedures

CliqTo Ltd has procedures in place to report a breach of data security to the regulator within 72 hours of becoming aware of any breach. We undertake the following procedures:

- Breaches are investigated at the earliest opportunity
- We notify individuals if there is a significant risk to their rights and freedoms

# Accountability

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## Contracts

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## Documentation

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- We conduct regular reviews of the personal data we process, updating documentation accordingly
- We undertake information audits to find out what data we hold
- We review our policies, procedures, contracts and agreements to address retention, security and data sharing
- We record the location of personal data
- We maintain records of any personal data breaches
- We document our processing activities in electronic form

### Our Accountable Practices

- We adopt and implement data protection policies where proportionate
- We implement appropriate security measures to protect data
- We record and report personal data breaches to the appropriate authorities
- We review and update our accountability measures at appropriate intervals

## Data Protection Officers

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- Our DPO contact details are as follows (please state below)

## Anim8 Productions Ltd

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Prepared on Tuesday, May 22, 2018

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### Disclaimer

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