

# Privacy Notice

This is the privacy notice of Focus Studio (Midlands) Limited, company registration number 07639753 (“we”, “our”, “us”).

Our address is 19 Waterloo Rd, Smethwick, B66 4JX.

## Introduction

This privacy notice informs you about how we process information that could identify you (known as ‘personal information’), your privacy rights in relation to such information and how the law protects you.

In the context of the law and this notice, ‘process’ means collect, store, transfer, use or otherwise act on information.

We are committed to protecting your privacy. We undertake to preserve the confidentiality of all information you provide to us.

Our policy complies with the Data Protection Act 2018 (Act) accordingly incorporating the EU General Data Protection Regulation (GDPR).

## 1. Data we process

The information we process about you includes information you have directly provided to us and data we have collated about you as a result of monitoring how you use our website.

When you buy from us, we ask you to provide personal information so as to be able to provide you with products or services. We categorise this information as follows:

- ‘Identity Information’, such as your first and last names
- ‘Contact Information’, such as your email address, your telephone number and your postal address
- ‘Transaction Information’ that includes the details of products and services you have bought from us and payments made to us
- ‘Payment Information’ that includes the information about your method of payment, such as your debit card number
- records of communication between us including messages sent through our website, email messages and telephone conversations

- 'Marketing Preferences' that tell us what types of marketing you would like to receive

By using our website, we process:

- 'Technical Information' about the hardware and the software you use to access our website, including your internet protocol (IP) address, your browser type and version and your device's operating system
- 'Usage Information', including the frequency you use our website and the pages of our website that you visit

## **2. Aggregated anonymised information**

We may aggregate anonymous information such as statistical or demographic information for any purpose. Anonymous information is information that does not identify you as an individual. Aggregated information may be derived from your personal information but is not considered personal information in law because it does not reveal your identity.

If we combine or connect aggregated information with your personal information so that it can identify you in any way, we treat the combined information as personal information and it will be used in accordance with this privacy notice.

## **3. Special personal information**

Special personal information is information about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric information.

We do not collect any special personal information about you.

## **2. If you do not provide personal information we need**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform that contract. In that case, we may have to stop providing a service to you. If so, we will notify you of this at the time.

## **The bases on which we process information about you**

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant then we shall immediately stop processing your data.

If the basis changes then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

### **3. Information we process because we have a contractual obligation with you**

When you buy a product or service from us a contract is formed between you and us.

In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information in any category.

We use it in order to fulfil our contract with you.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

### **4. Information we process with your consent**

Through certain actions when otherwise there is no contractual relationship between us we may ask you to provide your consent to us to process personal information.

For example, we ask you to agree to our use of non-essential cookies when you access our website.

We continue to process your information on this basis until you withdraw your consent, or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us. However, if you do so, you may not be able to use our website or our services further.

## **5. Information we process for the purposes of legitimate interests**

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having given careful consideration to:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so

For example, we may process your data on this basis for the purposes of:

- improving our services
- responding with appropriate and personalised replies to communication that you have initiated
- preventing fraudulent use of our services
- exercising our legal rights, including to detect and prevent fraud and to protect our intellectual property
- insuring against or obtaining professional advice that is required to manage risk within our business
- protecting your interests where we believe we have a duty to do so

## **6. Information we process because we have a legal obligation**

Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

This may include your personal information.

## **Specific uses of information you provide to us**

### **7. Information relating to your method of payment**

Payment Information is not taken by us on our website or transferred to us.

At the point of payment, you are transferred to a secure page on the website of our payment service provider or the payment page of our partner, Fujifilm. That page may be branded to look like a page on our website, but it is not controlled by us.

### **8. Communicating with us**

When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need.

We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high-quality service.

### **9. Cookies**

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit a website that uses them. They allow information gathered on one web page to be stored until it is needed for use at a later date.

They are commonly used to provide you with a personalised experience while you browse a website, for example, allowing your preferences to be remembered.

They can also provide core functionality such as security, network management, and accessibility; record how you interact with the website so that the owner can understand how to improve the experience of other visitors; and serve you advertisements that are relevant to your browsing history.

Some cookies may last for a defined period of time, such as one visit (known as a session), one day or until you close your browser. Others last indefinitely until you delete them.

Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use. Your web browser may support a plug-in or add-on that helps you manage which cookies you wish to allow to operate.

The law requires you to give explicit consent for use of any cookies that are not strictly necessary for the operation of a website.

This website is hosted by Wix, which uses cookies for a number of different reasons including for security purposes; for monitoring the performance of this website; and for providing a good experience for visitors. You can read more about how Wix uses cookies at <https://support.wix.com/en/article/cookies-and-your-wix-site>

## **10. Personal identifiers from your browsing activity**

Requests by your web browser to the servers for web pages and other content on this website are recorded.

This information is Technical Information, recorded for security purposes.

Theoretically, if combined with other information known about you from previous visits, the data possibly could be used to identify you personally. However, we do not use it in such a way.

## **11. Information sharing with business partners**

Some of our services are provided by third party businesses, such as Fujifilm, with whom we partner.

When we refer you to these business partners, we may disclose some personal information about you to them to improve the efficiency of our service or their service. We do so either because there exists or could reasonably exist a contractual obligation for us to do so, or because you have provided your consent.

You may provide a partner with additional personal information which you have not provided to us. Some of this information may be passed to us if there is a basis on which we may process it.

We encourage you to read the privacy policy of any partner whom you use.

## **Other matters**

### **12. Your rights**

The law requires us to tell you about your rights and our obligations to you in regard to the processing and control of your personal information.

We do this now, by requesting that you read the information provided at <http://www.knowyourprivacyrights.org>

### **13. Data may be processed outside the European Union**

Our business is based in the UK.

Our website hosting provider, Wix, is based in Israel. Israel is considered by the European Commission to offer an adequate level of protection for the personal information of EU Member State residents.

Your personal information may be stored through Wix's data storage, databases and the general Wix applications. Data is stored on secure servers behind a firewall.

Your data may be maintained, processed and stored by Wix and their authorised affiliates and service providers in the United States of America, in Europe (including in Lithuania, Germany and Ukraine), in Israel, and in other jurisdictions as necessary for the proper delivery of their services and/or as may be required by law.

Wix affiliates and service providers that store or process your data on Wix's behalf are each contractually committed to keep it protected and secured, in accordance with industry standards and regardless of any lesser legal requirements which may apply in their legal jurisdiction.

Wix's full privacy policy can be viewed at: <https://www.wix.com/about/privacy>

### **14. Control over your own information**

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

At any time you may contact us to request that we provide you with the personal information we hold about you.

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

## **15. Use of our website by children**

If you are under 18, you may use our website only with consent from a parent or guardian.

We collect data about all users of and visitors regardless of age, and we anticipate that some of those users and visitors will be children.

We do not sell products or provide services for purchase by children, nor do we market to children.

## **16. Encryption of data sent between us**

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us.

Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

## **17. Complaining**

If you are not happy with our privacy policy, or if you have any complaint, then you should tell us.

When we receive a complaint, we record all the information you have given to us. We use that information to resolve your complaint.



If the complaint relates to content we have posted on our website or a social media account, then if we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate.

If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.

If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office (ICO). This can be done at <https://ico.org.uk/make-a-complaint/>. We would, however, appreciate the opportunity to talk to you about your concern before you approach the ICO.

## **18. Retention period for personal data**

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- to provide you with the services you have requested
- to comply with other law, including for the period demanded by our tax authorities
- to support a claim or defence in court

## **19. Compliance with the law**

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you.

## **20. Review of this privacy policy**

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please contact us.