

Website Privacy Notice



1. Introduction

This privacy notice provides you with details of how we collect and process your personal data through your use of our site www.beings.com.

By providing us with your data, you warrant to us that you are over 13 years of age.

BEINGS DIGITAL LTD are the data controller and we are responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice).

We have appointed a Data Protection Officer who is in charge of privacy related matters for us. If you have any questions about this privacy notice, please contact the Data Protection Officer using the details set out below.

Contact Details

Our full details are:

Full name of legal entity: BEINGS DIGITAL LTD

Name and title of Data Protection Officer: Luke Dodgson – Digital Lead

Email address: luke.dodgson@beings.com

Postal address: Beings Digital Ltd, Unit 9 Sunfield Business Park, New Mill Road, Wokingham RG40 4QT, Berkshire

Details of our Representative: Magali Collin magali@beings.com

2. What Data Do We Collect About You, For What Purpose & On What Ground We Process It

Personal data means any information capable of identifying an individual. It does not include anonymised data.

We may process the following categories of personal data about you:

2.1. Clients & Potential Clients

2.1.1. **Communication Data** that includes any communication that you send to us whether that be through the contact form on our website, through email, social media messaging, social media posting, LinkedIn or any other communication that you send us. We may also require your social media login and/or other personal data in order to create internal logins for you with us. We process this data for the purposes of communicating with you, record keeping and in order to carry out our contractual obligations with you.

2.1.1.1. Our lawful ground for processing this information is initially consent. Please note that consent may be withdrawn at any time. Should you withdraw your consent, we will cease contacting you in line with data protection laws.

2.1.1.2. Once we have a contract in place, our legal basis for processing your data is legitimate interest.

2.1.1.3. Once we commence working together, we may need to use your personal data in order to comply with our obligations under our agreement with you and to send you communications relating to the services.

2.2. **Specific Client/Commercial Data** that includes data relating to any purchases of services such as your name, title, billing address, delivery address, email address, phone number, contact details, purchase details and your card details. We process this data to supply the services you have purchased and to keep records of such transactions.

2.2.1. Our lawful ground for this processing is the performance of a contract between you and us and/or taking steps at your request to enter into such a contract.

2.3. **User Data** that includes data about how you use our website and any online services. We process this data to operate our website and ensure relevant content is provided to you, to

ensure the security of our website, to maintain back-ups of our website and/or databases and to enable publication and administration of our website, other online services and business.

- 2.3.1. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business.

2.4. Employees & Potential Employees

2.4.1. Communication Data that includes any communication that you send to us whether that be through the contact form on our website, through email, social media messaging, social media posting, LinkedIn or other job boards or any other communication that you send us and may include, but is not limited to: CV, name, address, email address and any other data which may be contained on your CV. We process this data for the purposes of communicating with you, for interview purposes and for record keeping.

2.4.1.1. Our lawful ground for processing this information is initially consent. Please note that consent may be withdrawn at any time. Should you withdraw your consent, we will cease contacting you in line with data protection laws.

2.4.1.2. Once we have interviewed you, our legal basis for contacting you is legitimate interest.

2.4.1.3. Should you commence a role with us, our legal basis for contacting you will be either legitimate interest, contractual necessity or required by law depending on the communication.

2.4.2. Employee Information which includes information we may require to order to create your email address and grant you access to our internal systems. We will also be required to obtain a copy of your passport, proof of address and your financial information so that we can legally hire you.

2.4.2.1. Once we have interviewed you, our legal basis for processing your data is legitimate interest. We will keep the minimum data necessary in order to meet both our

legitimate interest obligations and to stay in line with the purpose for collection under data protection laws.

2.4.2.2. Once we commence working together, we will need to use your personal data in order to comply with our obligations under our agreement with you.

2.4.2.3. We will also have a legal obligation in order to retain some personal data relating to your employment with us such as financial information.

2.5. Contractors

2.5.1. Communication Data that includes any communication that you send to us whether that be through the contact form on our website, through email, social media messaging, social media posting, LinkedIn or other job boards or any other communication that you send us and may include, but is not limited to: CV, name, address, email address and any other data which may be contained on your CV. We process this data for the purposes of communicating with you, for interview purposes and for record keeping.

2.5.1.1. Our lawful ground for processing this information is initially consent. Please note that consent may be withdrawn at any time. Should you withdraw your consent, we will cease contacting you in line with data protection laws.

2.5.1.2. Once we have interviewed you, our legal basis for contacting you is legitimate interest.

2.5.1.3. Should you commence a role with us, our legal basis for contacting you will be either legitimate interest, contractual necessity or required by law depending on the communication.

2.5.1.4. We may contact you when a role has completed in order to let you know about another role. Our legal basis for contacting you for a new role is legitimate interest but should you no longer wish to receive communications from us you can request for us to stop at any time.

2.5.2. Contractor Information which includes information we may require to order to create your email address and grant you

access to our internal systems. We will also be required to obtain a copy of your passport, proof of address and your financial information so that we can legally assign you to a role. If you are working via a personal services company, we will also need to gather details of your company.

- 2.5.2.1.** Once we have interviewed you, our legal basis for processing your data is legitimate interest. We will keep the minimum data necessary in order to meet both our legitimate interest obligations and to stay in line with the purpose for collection under data protection laws.
- 2.5.2.2.** Once we commence working together, we will need to use your personal data in order to comply with our obligations under our agreement with you.
- 2.5.2.3.** We will also have a legal obligation in order to retain some personal data relating to your employment with us such as financial information.

2.6. Event Attendees

2.6.1. Communication Data that includes any communication that you send to us whether that be through the contact form on our website, through email, social media messaging, social media posting, one of our client websites or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance, or defense of legal claims.

- 2.6.1.1.** Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.
- 2.6.1.2.** Should you wish to attend an event, our legal basis for contacting you is under contract in order to send you a relevant details of the event in which you have booked.

2.7. Customer Data that includes data relating to any purchases of goods and/or services such as your name, title, billing address, delivery address email address, phone number, contact details, purchase details and your card details. We process this data to

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supply the goods and/or services you have purchased and to keep records of such transactions.

2.7.1. Our lawful ground for this processing is the performance of a contract between you and us or between you and our client and/or taking steps at your request to enter into such a contract.

2.7.2.

2.8. General

2.8.1. User Data that includes data about how you use our website and any online services together with any data that you post for publication on our website or through other online services. We process this data to operate our website and ensure relevant content is provided to you, to ensure the security of our website, to maintain back-ups of our website and/or databases and to enable publication and administration of our website, other online services and business.

2.8.1.1. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business.

2.8.2. Technical Data that includes data about your use of our website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data is from our analytics tracking system. We process this data to analyse your use of our website and other online services, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our advertising.

2.8.2.1. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business and to grow our business and to decide our marketing strategy.

2.8.3. Marketing Data that includes data about your preferences in receiving marketing from us and our third parties and your communication preferences. We process this data to enable

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you to partake in our promotions such as competitions, prize draws and free give-aways, to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this advertising.

2.8.3.1. Our lawful ground for this processing is our legitimate interests which in this case are to study how customers use our products/services, to develop them, to grow our business and to decide our marketing strategy.

2.8.4. We may use Customer Data, User Data, Technical Data and Marketing Data to deliver relevant website content and advertisements to you (including Facebook adverts or other display advertisements) and to measure or understand the effectiveness of the advertising we serve you. Our lawful ground for this processing is legitimate interests which is to grow our business. We may also use such data to send other marketing communications to you. Our lawful ground for this processing is either consent or legitimate interests (namely to grow our business).

2.9. Sensitive Data

We need to collect the following sensitive data about you in order to deliver the services/product:

- Racial or ethnic origin
- Data concerning health

We require your explicit consent for processing sensitive data, so when you submit your details, we will send you a further communication asking for you to confirm your consent to this processing.

Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide us with the requested data, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

We will only use your personal data for a purpose it was collected for or a reasonably compatible purpose if necessary. For more information on this please email us at privacy@beings.com. In case we need to use your details for an unrelated new purpose we will let

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you know and explain the legal grounds for processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

We do not carry out automated decision making or any type of automated profiling.

3. How We Collect Your Personal Data

We may collect data about you by you providing the data directly to us (for example by filling in forms on our site or by sending us emails). We may automatically collect certain data from you as you use our website by using cookies and similar technologies. Please see our [cookie policy](#) for more details about this.

We may receive data from third parties such as analytics providers such as Google based outside the EU, advertising networks such as Facebook based outside the EU, such as search information providers such as Google based outside the EU, providers of technical, payment and delivery services, such as data brokers or aggregators.

We may also receive data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

4. Marketing Communications

Our lawful ground of processing your personal data to send you marketing communications is either your consent or our legitimate interests (namely to grow our business).

Under the Privacy and Electronic Communications Regulations, we may send you marketing communications from us if (i) you made a purchase or asked for information from us about our services or (ii) you agreed to receive marketing communications and in each case you have not opted out of receiving such communications since. Under these regulations, if you are a limited company, we

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may send you marketing emails without your consent. However you can still opt out of receiving marketing emails from us at any time.

We will not share your personal data with any third party for their own marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you.

If you opt out of receiving marketing communications this opt-out does not apply to personal data provided as a result of other transactions, such as purchases, warranty registrations etc.

5. Disclosures of Your Personal Data

We may have to share your personal data with the parties set out below:

- 5.1. Service providers who provide IT and system administration services such as Google, Slido, Unity, Parsec and other internal systems.
- 5.2. Professional advisers including lawyers, bankers, auditors and insurers
- 5.3. Government bodies that require us to report processing activities.
- 5.4. Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

6. International Transfers

We share your personal data within our group of companies which involves transferring your data outside the UK and outside of the EEA.

We are subject to the provisions of the UK Data Protection Act and also the General Data Protection Regulations that protect your personal data. Where we transfer your data to third parties outside of the UK, we will ensure that certain

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safeguards are in place to ensure a similar degree of security for your personal data. As such:

- 6.1.** We may transfer your personal data to countries that the European Commission have approved as providing an adequate level of protection for personal data by; or
- 6.2.** If we use US-based providers that are part of EU-US Privacy Shield, we may transfer data to them, as they have equivalent safeguards in place; or
- 6.3.** Where we use certain service providers who are established outside of the EEA, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

7. Data Security

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions and they must keep it confidential.

We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

8. Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal,

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accounting, or reporting requirements.

When deciding what the correct time is to keep the data for we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers.

In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your Legal Rights

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at privacy@beings.com.

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email us at privacy@beings.com.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or refuse to comply with your request in these circumstances.

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We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

10. Third-Party Links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

11. Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [cookie policy](#).