



Fulwell 73 Limited

Website Privacy Notice

Fulwell 73 respects your privacy and is committed to protecting your personal information. We ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal information through your use of this website, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal information about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Who we are

Fulwell 73 Limited ('**Fulwell**') collects, uses and is responsible for certain personal information about you. When we do so we are regulated under the EU General Data Protection Regulation ('**GDPR**') which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws.

Our Head of HR is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Head of HR at privacy@fulwell73.com.

The data we collect about you

Personal information, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal information about you which we have grouped together follows:

Identity Data includes first name, last name, username or similar identifier, marital status, title, date of birth and gender.

Contact Data includes business address, email address and telephone numbers.



Technical Data includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

Usage Data includes information about how you use our website.

Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal information but is not considered personal information in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal information so that it can directly or indirectly identify you, we treat the combined data as personal information which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal information** about you (this includes details 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 data). Nor do we collect any information about criminal convictions and offences.

What happens if you fail to provide information

The provision of Identity and Contact Data is required from you to enable us to respond to your queries and to process script submissions. If you do not provide us with the necessary information, we will not be able to consider your script submissions or administer and respond to your queries.

How is your personal information collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity and Contact Data by corresponding with us by post, phone, email or otherwise. This includes personal information you provide when you:

- send us script submissions and Submission Release Forms;
- give us some feedback or send us queries to the contact details set out on the website;

[request marketing to be sent to you;]



- send us CVs and covering letters to apply for advertised roles or to register your interest with us;

(Please note that any personal information submitted for recruitment purposes will be processed in accordance with our **Recruitment Privacy Notice**.)

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal information by using cookies, server logs and other similar technologies. Please see our **Cookie Policy** for further details.

Third parties. We may receive Technical Data from analytics providers such as Google based outside the EU.

How we use your personal information

We will use your personal information in the following circumstances:

Where we need to perform the contract we are about to enter into or have entered into with you.

Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Where we need to comply with a legal or regulatory obligation.

Purposes for which we will use your personal information

We have set out below a description of all the ways we plan to use your personal information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. We may process your personal information for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us at privacy@fulwell73.com if you need any further details about the specific legal ground we are relying on, where more than one ground is set out below.



Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To consider your script submissions and store Submission Release Forms	(a) Identity (b) Contact	Performance of a contract with you
To administer and protect this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	Necessary for our legitimate interests (for network security)
To deliver relevant website content to you and measure or understand the effectiveness of the content we serve to you	(a) Usage (b) Technical	Necessary for our legitimate interests (to study how individuals use our website and content, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, content, marketing, user experience	(a) Technical (b) Usage	Necessary for our legitimate interests (to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

Marketing

We may use your Identity and Contact Data to send you marketing communications if you have requested information from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal information with any company outside Fulwell 73 for marketing purposes.

Opting out

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 or by contacting us at privacy@fulwell73.com at any time.



Where you opt out of receiving these marketing messages, this will not apply to personal information provided to us as a result of other interactions via the website.

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**.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Who we share your personal information with

We may have to share your personal information with the parties set out below for the purposes set out in the table above.

Service providers acting as processors who provide IT hosting and system administration services.

Professional advisers including lawyers, auditors and insurers who provide consultancy, legal and insurance services.

Other companies in the Fulwell 73 Group acting as joint controllers or processors.

Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal information in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.



We may also be required to share some personal information as required to comply with the law.

Transfers of your information outside the EEA

We do not transfer your personal information outside the European Economic Area ('EEA').

Your rights

Under the GDPR, you have a number of rights which may apply in certain circumstances. These include the right to:

- Access to your personal information and to certain other supplementary information that this privacy notice is already designed to address;
- Require us to correct any mistakes in your information which we hold;
- Require the erasure of personal information concerning you in certain situations;
- Receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations;
- Object at any time to processing of personal information concerning you for direct marketing;
- Object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you;
- Object in certain other situations to our continued processing of your personal information;
- Otherwise restrict our processing of your personal information in certain circumstances.

If you would like to unsubscribe from any email newsletter you can also click on the 'unsubscribe' button at the bottom of the email newsletter.

If you would like to exercise any of those rights, please email our Head of HR at privacy@fulwell73.com and let us have enough information to identify you. We may need to request specific information from you to help us confirm your identity. This is a security measure to ensure that personal information 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.

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

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 and keep you updated.



Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How long will you use my personal information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

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.

How to complain

We hope that we can resolve any query or concern you raise about our use of your personal information.

The GDPR also gives you the right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/>.

Changes to the privacy notice and your duty to inform us of changes



This version was last updated on **8th September 2020**. We may change this privacy notice from time to time, when we do we will inform you by updating this section and including a link to previous versions of our website privacy notice.

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