

# OUR PRIVACY POLICY

Last updated May 29, 2020

We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us at [info@icebrokenproductions.co.uk](mailto:info@icebrokenproductions.co.uk).

We take your privacy very seriously. In this privacy policy, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy policy that you do not agree with, please discontinue use of our Sites and our services.

Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.

## 1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

In Short: We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when expressing an interest in obtaining information about us or our products and services, when participating in activities on the Services or otherwise contacting us.

The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make and the products and features you use. The personal information we collect can include the following:

Publicly Available Personal Information. We collect first name, maiden name, last name, and nickname; email addresses; business email; business phone number; and other similar data.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

## **2. HOW DO WE USE YOUR INFORMATION?**

In Short: We process your information for purposes based on legitimate business interests, the fulfilment of our contract with you, compliance with our legal obligations, and/or your consent.

We use personal information collected via our Services for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

To send administrative information to you. We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies.

Fulfil and manage your orders. We may use your information to fulfil and manage your orders, payments, returns, and exchanges made through the Services.

To deliver services to the user. We may use your information to provide you with the requested service.

To respond to user inquiries/offer support to users. We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Services.

## **3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?**

In Short: We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfill business obligations.

We may process or share data based on the following legal basis:

Consent: We may process your data if you have given us specific consent to use your personal information in a specific purpose.

**Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.

**Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.

**Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).

**Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

**Vendors, Consultants and Other Third-Party Service Providers.** We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the Services, which will enable them to collect data about how you interact with the Services over time. This information may be used to, among other things, analyse and track data, determine the popularity of certain content and better understand online activity. Unless described in this Policy, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.

**Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

#### **4. HOW LONG DO WE KEEP YOUR INFORMATION?**

In Short: We keep your information for as long as necessary to fulfil the purposes outlined in this privacy policy unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this policy will require us keeping your personal information for longer than 1 year.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

#### **5. HOW DO WE KEEP YOUR INFORMATION SAFE?**

In Short: We aim to protect your personal information through a system of organisational and technical security measures.

We have implemented appropriate technical and organisational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the services within a secure environment.

#### **6. DO WE COLLECT INFORMATION FROM MINORS?**

In Short: We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of

the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under age 18, please contact us at [info@icebrokenproductions.co.uk](mailto:info@icebrokenproductions.co.uk).

## **7. WHAT ARE YOUR PRIVACY RIGHTS?**

In Short: In some regions, such as the European Economic Area, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.

In some regions (like the European Economic Area), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please use the contact details provided below. We will consider and act upon any request in accordance with applicable data protection laws.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal.

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here:

[http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm).

## **8. CONTROLS FOR DO-NOT-TRACK FEATURES**

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ('DNT') feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored

and collected. No uniform technology standard for recognising and implementing DNT signals has been finalised. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy policy.

## **9. DO WE MAKE UPDATES TO THIS POLICY?**

In Short: Yes, we will update this policy as necessary to stay compliant with relevant laws.

We may update this privacy policy from time to time. The updated version will be indicated by an updated 'Revised' date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

## **10. HOW CAN YOU CONTACT US ABOUT THIS POLICY?**

If you have questions or comments about this policy, you may contact our Data Protection Officer (DPO), Alexander Brett, by email at [info@icebrokenproductions.co.uk](mailto:info@icebrokenproductions.co.uk) or by phone at 07869 577459