



View Films Limited Privacy Policy

View Films Limited - Data Protection and Privacy Policy

Last updated: [27] January 2022

We, View Films Limited (CN:07485433) with a registered address at Index House, St. George's Lane, Ascot, England, SL5 7ET (herein referred to as "**View Films**", "**us**", "**we**" and "**our**" in this privacy policy) are committed to protecting and respecting your privacy. Any information you provide us will be properly protected and under no circumstances will it be sold or rented to a third party.



1. Controller

View Films Limited is the controller and responsible for your personal data.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

2. Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our DPO in the following ways:

Full name of legal entity: View Films Limited (CN:07485433)

Email address data@viewfilms.com

Postal address: Index House, St George's Lane, Ascot, SL5 7ET

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

3. Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

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

4. Third-party links

Our 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 policy of every website you visit.

5. Information we may collect from you

At all times our aim is to hold the minimum amount of personal data in support of our legitimate business interests.



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

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, 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.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also collect personal information about your interactions and transactions with us, including any actions through monitoring and recording any contact we have with you by telephone, email or online for purposes including security, dispute resolution and training.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **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 data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** 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.

If you fail to provide personal data

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 the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

6. How we may collect your personal data

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

- **Access our website**

We use Secure Sockets Layer (SSL) certificates on our website that encrypts the transmission of data to and from your browser. While we use strong encryption, both when your information is moving to or from our web services and also whilst your information is held by us, unfortunately the transmission of information via the internet can never be completely secure.

Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

This website is built using Cloudflare. You can learn more about their privacy [here](#).

- **Correspond with us by phone**

When you call us we may collect Calling Line Identification (CLI) information. We use this information to help improve efficiency and effectiveness. You have the right to withhold your number before placing a call to us. We reserve the right to record calls for data protection and training purposes.

- **Correspond with us by email**

We use Google Workspace, to process emails. These services use encryption to protect data in transit and at rest. Data in transit is protected using HTTPS, which is activated by default for all users.



Our email services encrypt customer content stored at rest, without any action required from customers, using one or more encryption mechanisms. If your email service does not support TLS, you should be aware that any emails we send or receive may not be protected in transit.

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

Access to our email is protected by a 2-step verification process and our system warns us if an unidentified device tries to access a particular inbox.

- **Correspond with us by social media**

If you send us a private or direct message via social media the message will be stored for a reasonable period of time. It will not be shared with any organisations other than the inherent involuntary sharing of such data with the social media platforms in question due to the personal data being stored on their own servers.

- **Opting in to receive our e-newsletter**

We use double opt in on our email lists. This means that once you enter your details an email confirmation is sent to you for you to confirm your subscription request. We gather statistics around email opening and clicks using industry standard technologies including clear gifs to help us monitor and improve our e-newsletter. Out of respect for our users privacy we provide a way to opt-out of these communications via the unsubscribe mechanism at the bottom of each email.

7. Automated technologies or interactions and third parties or public sources.

As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

When someone visits this site, we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone.

We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.



We may have access to geolocation data as indicated by your IP address. We collect and process IP addresses of all devices where some of our services are made available on such as our live chat. Collecting and processing your geo-location data refers to mobile devices as well as computers.

We may use your information collected from the website to personalise your repeat visits to our website. You can choose to accept or decline cookies.

8. Cookies

Most web browsers automatically accept cookies, but you can modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website. For further information visit www.aboutcookies.org or www.allaboutcookies.org.

9. How we use your information

As part of our ongoing legitimate business interest, we will only use this information for the provision of services requested and marketing purposes. We may provide you with information about other goods and services that we believe you may be interested in and if you are an existing customer are similar to those that you have already purchased or enquired about.

We will also notify you about changes to our goods and service(s). We respect your right to opt-out of our marketing communications via an opt-out button and the ongoing maintenance of an email marketing suppression list. In addition to our legitimate business interest, we also consider that customers and contacts have opted into our marketing communications when one or more of the following have occurred:

- volunteering your information in our newsletter subscribe form;
- by ticking a checkbox on another form on our website to opt-in to our marketing communications;
- if you completed an offline form and you have ticked the box indicating they would like to be contacted with more information;
- if you have completed a form from a third party, such as Facebook, as a result of an advert;
- if you gave us your business card and we verbally explained how we would like to stay in touch;
- if you connected via LinkedIn and we explained how we would like to stay in touch;
- if we provided you with a service; or



- by verbal permission within a telephone call with us.

The security of your data such as subscriber lists and campaign content is incredibly important to us. We have put in place both hardware and software protection in order to protect your personal data, access to your account and the information it contains from unauthorised third parties.

10. Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

11. Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing. You have a right at any time to stop us from contacting you for marketing purposes by contacting us to opt out.

12. Disclosures of your personal data

We may share your personal data with certain third parties as referred to below for the purposes already mentioned in this privacy policy:

Such external Third Parties include AccountedFor Ltd. Sage, Dext, NatWest, Monday, MailChimp, Google, Vimeo, WeTransfer, Rev. Microsoft, Zoom and OneTrust that we use as services providers (acting as processors and in connection with our services offered via our website) whether as a plug-in or similar application or not, based principally in the EEA, the US and Canada which provide a range of services to us enabling our business to operate. These include accounting, banking, workflow collaboration services, email, communications platforms and cloud storage services that we use in relation to our business and the services we provide. We may also share limited personal data with freelancers, venues and actors in relation to our performance of services offered such as for video shoots.

Also, to 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 data in the same way as set out in this privacy policy.



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

13. International transfers

As referred to in section 12 above, several of our external third parties are based outside the UK so their processing of your personal data will, in limited circumstances, involve a transfer of data outside the UK (as well as the EU).

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data. This will include countries in the EEA. For further details please contact us at data@viewfilms.com
- Where we use certain service providers as referred to in section 12 above, we may use specific contracts approved for use in the UK which give personal data the same or substantially similar protection to that which it has in the UK under the usage terms we have with such service providers. In some limited cases, these may not provide you with full recourse - for example you should be aware that the US offers levels of protection below those of the UK, EEA countries and Canada and that the service provider may not offer further guarantee to address that deficit, so it is possible that government agencies can access your personal data through the transmission without you having any legal recourse. For further details please contact us at data@viewfilms.com

14. Change of purpose

We will only use your personal data 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 you wish to



get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data 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 data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

15. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

16. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data



and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see *your legal rights* at Part 9 below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

17. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see the glossary terms for the defined term below, to find out more about these rights:

- **Request access** to your personal data;
- **Request correction** of your personal data;
- **Request erasure** of your personal data;
- **Object to processing** of your personal data;
- **Request restriction** of your personal data;
- **Request transfer** of your personal data; and
- **Withdraw consent.**

If you wish to exercise any of these rights set out above, please contact us.



18. No fee usually required

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. Alternatively, we could refuse to comply with your request in these circumstances.

19. What we may need from you

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.

20. Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could 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.