

# **Privacy Policy**

#### Introduction

At Bee Big Agency we respect your privacy and are committed to protecting your personal data. This privacy notice will inform you how we look after your personal data when you visit our website (regardless of where you visit from) and tell you about your privacy rights and how the law protects you. Our website is not intended for children, and we do not knowingly collect data relating to children.

#### Controller

Bee Big Agency is the controller and responsible for your personal data (collectively referred to as "BBA", "we", "us" or "our" in this privacy notice).

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please use the contact details set out below.

Full name of legal entity: Bee Big Agency Limited

Email address: hello@beebigagency.buzz

Postal address: 3 South Lane, Houghton, Arundel, West Sussex BN18 9LN

Telephone number: 07971 647618

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority 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.

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

This version was last updated on 05 March 2025

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.

## Third-party links

This website does not contain links to third-party websites, plug-ins and applications.

#### Our principles

We aim to protect any personal data we hold, to manage your personal data in a responsible way and to be transparent in our practices. Your trust is important to us. We have therefore committed ourselves to the following basic principles:

 You have no obligation to provide any personal data requested by us. However, if you choose not to, we may not be able to provide you with some services;

- We only collect and process your data for the purposes set out in this Privacy Statement or for specific purposes that we share with you and/or that you have consented to;
- We aim to collect, process and use as little personal data as possible;
- When we do collect your personal data, we aim to keep it as accurate and up to date as possible;
- If the personal data we collect is no longer needed for any purposes and we are not required by law to retain it, we will do what we can to delete, destroy or permanently de-identify it;
- Your personal data will not be shared, sold, rented or disclosed other than as described in this Privacy Statement.

## What personal data do we collect?

Personal data, 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 data about you when you apply for a role as a prospective candidate and/or engage us for services which we have grouped together 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 services you have purchased from us.
- Technical Data includes internet protocol (IP) address, login details, 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. This information is collected and tracked via Google Analytics, not stored on <u>beebigagency.buzz</u> website databases.
- Profile Data includes your username and password, purchases made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our website, products and services.

- Information relating to criminal convictions will usually be where such
  processing is necessary to carry out our obligations and provided we do so in line
  with our data protection policy
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data 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 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 notice.

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).

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 in to 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.

### How is your personal data collected?

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

- 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:
  - engage with us to provide services;
  - submit your details to us to apply for a position;
  - request marketing to be sent to you;
  - enter a competition, promotion or survey; or
  - give us some feedback.

We store this Personal Data on Wix.com which is our client relationship management tool. Wix.com is a cloud based provider and more information can be found about them on their website here.

 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 data by using cookies, server logs and other similar technologies.
- Third parties or publicly available sources. We may receive personal data about you from various third parties and public. Any carefully selected partners and service providers may process personal information about you on our behalf as described below:

### **Digital Marketing Service Providers**

We periodically appoint digital marketing agents to conduct marketing activity on our behalf, such activity may result in the compliant processing of personal information.

Identity and Contact Data from specialist third party recruitment consultants who assist in sourcing candidates using publicly available sources;

 Identity and Contact Data from publicly availably sources such as Companies House and the Electoral Register based inside the EU.

## Why do we collect and use your personal data?

We will only use your personal data when the law allows us to so we can provide you with the best possible service. Most commonly, we will use your personal data 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.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

When we collect and use your personal data for purposes mentioned above or for other purposes, we will inform you before or at the time of collection.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity	Performance of a contract with you
	(b) Contact	
To process and deliver services to you including:	(a) Identity	
<ul><li>(a) Manage payments,</li><li>fees and charges</li><li>(b) Manage the</li><li>recruitment process</li></ul>	(b) Contact	(a) Performance of a contract with you
	(c) Financial	(b) Necessary for our legitimate
	(d) Transaction	interests (to recover debts due
(c) Collect and recover money owed to us	(e) Marketing and Communications	to us)
To manage our relationship with you	(a) Identity	(a) Performance of a contract with you
which will include:	(b) Contact	(b) Necessary to comply with a legal obligation
(a) Notifying you about changes to our terms or	(c) Profile	(c) Necessary for our legitimate
privacy policy	(d) Marketing and	interests (to keep our records updated and to study how customers use our products/services)
(b) Asking you to leave a review or take a survey	Communications	
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity	(a) Performance of a contract with you
	(b) Contact	
	(c) Profile	(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
	(d) Usage	
	(e) Marketing and Communications	
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support,	(a) Identity	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a
	(b) Contact	
	(c) Technical	

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
reporting and hosting of data)		business reorganisation or group restructuring exercise)
		(b) Necessary to comply with a legal obligation
To deliver relevant website content to you and measure or understand the effectiveness of the marketing communications we send	(a) Identity	
	(b) Contact	Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy)
	(c) Profile	
	(d) Usage	
	(e) Marketing and Communications	
	(f) Technical	
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
	(a) Identity	
To make suggestions and recommendations to you about services that may be of interest to you	(b) Contact	Necessary for our legitimate interests (to develop our services and grow our business)
	(c) Technical	
	(d) Usage	
	(e) Profile	

# Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

### 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 services 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 data with any company outside the BBA group of companies 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 any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a purchasing a service, service experience or other transactions.

### **Legitimate Interest**

We may process your personal information for our legitimate business interests e.g. direct marketing/data analytics/enhancing, modifying or improving our services/identifying usage trends/determining the effectiveness of promotional campaigns and advertising.

"Legitimate Interests" means the interests of our company in conducting and managing our business to enable us to give you the best service. For example, we have an interest in making sure our marketing is relevant for you, so we may process your information to send you marketing that is tailored to your interests.

When we process your personal information for our legitimate interests, we make sure to consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. Our legitimate business interests do not automatically override your interests – we will not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

### Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above:

• External Third Parties as set out in the Glossary; and

• 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 notice.

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.

### 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.

### Data retention – How long will you use my personal data for?

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, accounting, or reporting requirements.

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 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. Please see 'the right to erasure of your personal data' below for further information.

In some circumstances we may 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.

### Glossary

### Lawful basis

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

#### **External Third Parties**

- Service providers acting as processors based in the UK who provide IT (including website) and system administration services.
- Professional advisers and recruitment support advisors acting as processors or joint controllers including associates, lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

### Your rights

Where we process your personal data, you are entitled to a number of rights and can exercise these rights at any point. We have provided an overview of these rights below together with what this entails for you. We can be contacted at: hello@beebigagency.buzz

### The right to access your personal data and correction

You have the right to request access to your personal data (commonly known as a 'data subject access request'). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. You also have the right to

request correction of the personal data we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. We can be contacted at: hello@beebigagency.buzz

### The right to data portability

Your personal data is portable. This means it can be moved, copied or transmitted electronically. However, this right only applies where:

- a) the processing is based on your consent;
- b) the processing takes place for the performance of a contract;
- c) the processing takes place by automated means;

If you wish to exercise your right to data portability, we can be contacted at: hello@beebigagency.buzz

The right to erasure of your personal data

You have right to request that we erase your data if:

- a) your personal data is no longer necessary in relation to the purposes for which we collected it; or
- b) you withdraw the consent that you had previously given us to process your personal data, and there is no other legal ground to process that personal data; or
- c) you object to us processing your personal data for direct marketing purposes; or
- d) you object to us processing your personal data for BBA's legitimate interests (such as improving overall user experience on websites);
- e) the personal data is not being processed lawfully; or
- f) your personal data needs to be deleted to comply with the law.

If you wish to delete the personal data we hold about you, please let us know and we will take reasonable steps to respond to your request in accordance with legal requirements. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

If the personal data we collect is no longer needed for any purposes and we are not required by law to retain it, we will do what we can to delete, destroy or permanently deidentify it.

The right to restriction of processing

You have the right to restrict the processing of your personal data if:

- a) you do not believe the personal data we have about you is accurate; or
- b) the personal data is not being processed lawfully, but instead of deleting the personal data, you would prefer us to restrict processing instead; or
- c) we no longer need your personal data for the purposes we collected it, but you require the data in order to establish, exercise or defend legal claims; or
- d) you have objected to the processing of your personal data and are awaiting verification on whether your interests related to that objection outweigh the legitimate grounds for processing your data.

If you wish to restrict our processing of your personal data, please let us know and we will take reasonable steps to respond to your request in accordance with legal requirements.

## The right to object

You have the right to object to the processing of your personal data at any time where we relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

The right to lodge a complaint with a supervisory authority

You have the right to lodge a complaint directly with supervisory authority about how we process personal data.

The right to withdraw consent at any time

You have the right to withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

## Cookies and other technologies

### What are cookies?

Cookies are small files saved to the user's computer's hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience within this website.

#### What do we use cookies for?

We may use cookies to remember personal settings you have chosen at our website. In no other context do we use cookies to collect information that identifies you personally. Most of the cookies we set are automatically deleted from your computer when you leave our website or shortly afterwards.

We use anonymous session cookies (short-term cookies that disappear when you close your browser) to help you navigate the website and make the most of the features.

This website uses tracking software to monitor its visitors to better understand how they use it. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to your computer's hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information.

Should users wish to deny the use and saving of cookies from this website onto their computer's hard drive, they should take necessary steps within their web browser's security settings to block all cookies from this website and its external serving vendors.

### How to contact us

If you have any questions, comments or complaints regarding this Privacy Statement or the processing of your personal data, please contact us via: hello@beebigagency.buzz