#### **Creative MGMT Ltd Customer Privacy Notice**

This privacy notice tells you what to expect us to do with your personal information. It is applicable to anyone we come in contact with while carrying out our business, be it clients, suppliers or users of our website.

- Contact details
- What information we collect, use, and why
- · Lawful bases and data protection rights
- · Where we get personal information from
- How long we keep information
- · Who we share information with
- · Sharing information outside the UK
- How to complain

#### **Contact details**

Email: claudia@creative-mgmt.co.uk

# What information we collect, use, and why

We collect or use the following information to provide services (graphic design, sound recording, music marketing and publishing, A&R):

- **Contact details**: information that allows us to identify and contact you directly such as your name, address, email address and telephone number and work and/or home address.
- Website user information (including user journeys and cookie tracking)

## Where we get personal information from

- · Directly from you
- On our website: provides us with information about how you use it and devices you use to connect to our website

#### Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- Your right of access You have the right to ask us for copies of your personal information. You can request
  other information such as details about where we get personal information from and who we share
  personal information with. There are some exemptions which means you may not receive all the
  information you ask for.
- Your right to rectification You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete.
- Your right to erasure You have the right to ask us to delete your personal information.
- Your right to restriction of processing You have the right to ask us to limit how we can use your personal information.
- Your right to object to processing You have the right to object to the processing of your personal data.
- Your right to data portability You have the right to ask that we transfer the personal information you gave us to another organisation, or to you.
- Your right to withdraw consent When we use consent as our lawful basis you have the right to withdraw your consent at any time.

If you make a request, we must respond to you without undue delay and in any event within one month. To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

# Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to provide services and goods are:

• Contract – we have to collect or use the information so we can enter into or carry out a contract with you.

All of your data protection rights may apply except the right to object.

• Legitimate business interests - we have a legitimate interest to improve the services we provide. The personal information of how you use the website is used for the purposes of data analytics to help us improve our online services.

# Other uses we will make of your data

#### Cookies/Use of our website

Our website uses cookies to distinguish you from other users. This helps us to provide you with a better experience while you browse and also allows us to improve our site.

We use this information:

- to look after our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site and make sure that content is presented in the best way for you and for your computer;

To manage the cookies and similar technologies used (tracking pixels, web beacons, etc.) and related consents, we use the consent tool «Real Cookie Banner». Details on how «Real Cookie Banner» works can be found at https://devowl.io/rcb/data-processing/

# How long we keep information

We understand our legal duty to retain accurate data and only retain personal data for as long as we need it, and as long as you're happy for us to have it. We remove data that we no longer have a legitimate business interest in keeping.

# Who we share information with

We do not share your personal information with external parties except for the purposes of fulfilling our contracts with you or where required by law. For example, we collect and use client contact information to provide services but do not share this information with third parties unless it is necessary to fulfill the terms of our services. We only collect personal information from artists with their explicit consent, which is shared with external parties, including record label/music distributors, for the purpose of facilitating sound publishing/digital recording deals and other opportunities.

### Sharing information outside the UK

We transfer personal information outside of the UK, particularly to record companie/music distributors in the US, based on explicit consent provided by the artist. We ensure that all necessary safeguards are in place to protect the personal data, in compliance with UK data protection law. If you would like more information on the safeguards we have in place, please contact us using the information provided.

## How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK5 9AF

Helpline number: 1113 123 0303

Website: https://www.ico.org.uk/make-a-complaint

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