

## **PRIVACY POLICY**

### **OUR PRIVACY POLICY**

Neon Creations Ltd honours the rights of its customers, employees and other users' including website visitors' right to privacy and data protection. Neon Creations Ltd is fully committed to complying with the provisions of all applicable Data Protection legislation and regulations such as Data Protection Act and EU GDPR. This Privacy Policy ("Policy") describes how Neon Creations Ltd collects, uses, shares, and retains personally identifiable information provided by users of this website. The Policy is effective as of 24<sup>th</sup> May 2018. The policy will be continuously assessed against new technologies, business practices, regulatory changes and the evolving needs of Neon Creations Ltd.

#### **Data Controller**

The data controller for all personal data collected via this website, emails, phone calls, and face to face meetings is Neon Creations Ltd with its registered office at 140 Quarry Pond Road, Worsley, Manchester, M28 0YG. This means that we are responsible for deciding what data we collect and how we hold and use your personal data. We will implement appropriate data security measures for protecting the data from unauthorised access and loss, as laid out in the Security section of this Policy.

#### **Data Collection**

Neon Creations Ltd collects and maintains a variety of personally identifiable information, including names, email addresses, phone numbers, payment information, social media profiles, and business/private addresses. Neon Creations Ltd collects information directly from individuals. The information could be collected through e-mails, phone calls, online registration forms, event registration forms and face to face meetings. Neon Creations Ltd does not collect personal data about individuals except when there is a legitimate business requirement or when such information is provided on a voluntary basis.

#### **Cookies**

'Cookies' are used on all websites. We use 'cookies' to enhance visitors experience, to enable the site to work more efficiently and to track traffic through the site. All information is collected anonymously.

We use Google Analytics 'cookies' to help analyse how visitors use the site. They collect information and visitor behaviour in an anonymous form. This information is transmitted to Google and is used by Neon Creations Ltd in a statistical form.

If you use this website we assume you are happy to allow us to use 'cookies' for these purposes. You can delete 'cookies' by going into your browser settings or alternatively, you can use the website anonymously depending on the search engine you are using, for example, 'In Cognito' using Apple Mac.

### **Purpose of Processing**

The personal data collected is used by Neon Creations Ltd to give you information in relation to Neon Creations' website, products, customer administration, account management with existing customers, to process and respond to queries received, and to send marketing communications on Neon Creations' behalf or on behalf of Neon Creations' patrons and strategic partners. Neon Creations Ltd may perform statistical analyses of user behaviour and characteristics to measure interest in and the use of various sections of the website.

If you choose to opt out of promotional/marketing emails, this will not stop all communication from us, if the communication is in the legitimate interest of the business, for example (but not exclusively), technical/maintenance information regarding your purchase.

### **Data retention**

The personal data collected is stored in Neon Creations' CRM system and other appropriate data management systems, both paper based and electronic. Personally identifiable information will not be disclosed to any third party except if permission has first been obtained from the users. The data will not be transferred to any agency located outside the EU. At regular intervals, we will:

- review the length of time we keep your personal data for
- consider the purpose or purposes for which we hold your personal data for in deciding whether (and for how long) to retain it
- securely delete information that is no longer needed for that purpose or those purposes
- update, archive or securely delete information if it goes out of date.

## **Security**

Neon Creations Ltd uses reasonable measures to safeguard personally identifiable information. The implemented measures will be appropriate to the type of information maintained and compliance with all relevant legislation governing protection of personal information. Measures are implemented to preserve the confidentiality, integrity and availability of the personal information. 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 only those employees, contractors or agents who have a legitimate business need to have access to that data. The employees, contractors or agents will process your personal data in accordance with our instructions. They will be subject to a duty of confidentiality and due care with respect to handling the personal data. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so. Neon Creations' employees are trained on data security and information protection. Relevant areas of Neon Creations' website will employ Secure Socket Layer ("SSL") or Transport Layer Security ("TLS") encryption technology to enhance data privacy and help prevent loss, misuse, or alteration of the information collected and retained by Neon Creations Ltd.

## **Links to Third-Party Sites**

Where appropriate and only for the legitimate business needs of Neon Creations Ltd, Neon Creations Ltd may provide links to third-party web sites, or advertisements which contain links to third-party sites. These links are provided as a service to website users. The linked third-party websites are operated by independent entities that have their own privacy policies. This Privacy Policy does not apply to such other websites or to the use that those entities make of your information. Neon Creations Ltd has no control over the content displayed on such sites, nor over the measures, if any, that are taken by such sites to protect the privacy of your information. Neon Creations' website may also serve third party advertisements, or other content that contains their own cookies or tracking technologies. Neon Creations Ltd does not control the use of those technologies.

## **Opt-Out**

Neon Creations Ltd is a supplier of goods, and for its legitimate business interests, must maintain contact information on its clients to communicate

information relevant to their purchase. Neon Creations Ltd also occasionally sends promotional material promoting its products, examples of previous work, technical information, and other relevant offerings. If you do not wish to receive marketing material, you may opt out. Every marketing e-mail will include an 'unsubscribe' link at the bottom. You may also notify Neon Creations Ltd in writing as set out below.

### **Social media**

We may use third party provided tools such as Hootsuite to manage our social media interactions. If you send us a private or direct message via social media the message may be stored by Hootsuite. Like other personal data, these direct messages will not be shared with any other organisations.

### **Access, Review and Correction**

The General Data Protection Regulations gives you the right to access your personal data held by us ("subject access request"). If you have an established business relationship with Neon Creations Ltd, you may request from us a list of the categories of personal information held about you. Subject access requests must be made in writing to the details below. We will endeavour to respond to the request within a reasonable period and in any event within one month as required by the relevant provisions in the GDPR.

It is important that the personal data we hold about you is accurate and current. We will take all reasonable measures to ensure that the personal data we hold about you is accurate. We have also implemented procedures to enable you to review and correct your personal information, should there be any changes to your circumstances or errors in the gathered data. When you make a request to access or review the personal data we hold about you, we will request you to verify your identity before the request can be fulfilled.

### **Privacy Rights**

In addition to the rights of access, review and correction, you have the right to object to your personal data being processed for any particular purpose, or to request that we stop using your information. If you wish to exercise these rights, please e-mail [gdpr@neoncreations.co.uk](mailto:gdpr@neoncreations.co.uk) or send a letter marked "Data Protection" to Neon Creations' offices at Unit H6 Swan Business Centre, 4 Higher Swan Lane, Bolton, BL3 3AQ. If you have further concerns about how we use your personal data, you also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the data protection authority for the UK. Please visit <https://ico.org.uk/> for more details on your data protection rights and how to contact them.

This privacy policy was last updated on 24<sup>th</sup> May, 2018.