



STARSCREAM COMMUNICATIONS LIMITED DATA PRIVACY POLICY

Introduction

Welcome to Starscream Communications Limited's privacy policy.

Starscream Communications Limited ("**Starscream**" or "**We**") respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you. Please use the Glossary at the end of this policy to understand the meaning of some of the terms used.

1. Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how Starscream Communications Limited collects and processes any personal information that you provide through this website as well any information you may provide through the use of our services and through your communications with us (**Data**).

This website is not intended for children, and we do not knowingly collect Data relating to children.

We are the controller and responsible for your Data. If you have any questions on this policy, including any requests to exercise your legal rights, please contact Rosie Gray using the details set out below:

Full name of legal entity: Starscream Communications Limited

Email address: rosie@starscreamcommunications.co.uk

Postal address:

Unit 23
Tileyard Studios
Tileyard Road
London N7 9AH

It is important that you read this privacy policy so that you are fully aware of how and why we are using your Data. 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.

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

We keep our privacy policy under regular review. This version was last updated in January 2022.

STARSCREAM

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

2. The Data we collect about you

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 Data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username, job title, or similar identifier.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Demographic Data** includes postcode, preferences and interests.
- **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, 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.
- **Usage Data** includes information about how you use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

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

If you fail to provide Data

Where we need to collect 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 service you have with us, but we will notify you if this is the case at the time.

3. How is your 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 Data you provide when you:
 - use our services;

STARSCREAM

- complete surveys that we use for research purposes (although you are not obliged to respond to them);
- subscribe to our publications;
- elect to receive marketing communications from us;
- enter a competition or promotion; or
- give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this Data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [cookie policy](#) for further details.
- **Third parties or publicly available sources.** We will receive Data about you from various third parties and public sources as set out below:
 - Technical Data from the following parties:
 - (i) analytics providers such as Google, based outside the UK;
 - (ii) advertising networks such as Google based outside the UK; LinkedIn and Twitter based inside the UK; and
 - (iii) search information providers such as Google, based outside the UK.
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services.

This 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.

4. How we use your Data

We will only use your Data when the law allows us to and in order to provide you with the best possible service and experience of our website and our services. Most commonly, we will use your Data in the following circumstances:

- Where we have your consent to take part in research.
- 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 obligation.

Purposes for which we will use your Data

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

STARScream

Note that we may process your 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 grounds, we are relying on to process your 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 client	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to fulfil the contracts for our clients)
To process and deliver your service including: (a) Manage payments, fees, and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: a) Notifying you about changes to our terms or privacy policy; and b) Keeping you informed about the research that we are conducting.	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation
To enable you to complete a survey or other market research	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to carry out research)

STARSCREAM

To administer and protect our business and this website (including troubleshooting, Data analysis, testing, system maintenance, support, reporting and hosting of Data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security and to prevent fraud) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	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)
To use Data analytics to improve our website, services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our services and grow our business)

Marketing

We strive to provide you with choices regarding certain Data uses, particularly around marketing and research.

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. Similarly, we may use such Data to decide if you would be a suitable participant in our market research. You may opt-out of any contact from us at any time.

For the delivery of direct marketing to you via e-mail, we'll need your consent, whether via an opt-in or soft-opt-in:

- soft opt-in consent is a specific type of consent which applies when you have previously engaged with us (for example, you contact us to ask us for more details about a particular product/service, and we are marketing similar products/services). Under "soft opt-in" consent, we will take your consent as given unless you opt-out.

STARSCREAM

- for other types of e-marketing, we are required to obtain your explicit consent; that is, you need to take positive and affirmative action when consenting by, for example, checking a tick box that we'll provide.

if you are not satisfied about our approach to marketing, you have the right to withdraw consent at any time. To find out how to withdraw your consent, see the section headed "Your rights" below.

We will get your express opt-in consent before we share your Data with any third party for marketing purposes.

You can third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you.

Change of purpose

We will only use your 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 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 Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your Data

We may share your Data with the parties set out below for the purposes set out in the table *Purposes for which we will use your Data* above.

- Internal Third Parties as set out in the *Glossary*.
- External Third Parties as set out in the *Glossary*.
- Specific third parties listed in the table *Purposes for which we will use your Data* above.
- 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 Data in the same way as set out in this privacy policy.

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

6. International transfers

Many of our external third parties are based outside the UK so their processing of your Data will involve a transfer of Data outside the UK. It may also be processed by staff operating outside the EU who work for us or for one of our suppliers. We will only transfer Data outside the EEA where it is compliant with Data Protection Laws and the means of transfer provides adequate safeguards in relation to your Data, e.g. by way of data transfer agreement or incorporating the current standard contractual clauses adopted by the European Commission.

STARSCREAM

To ensure that your Data receives an adequate level of protection, we have put in place appropriate safeguards and procedures with the third parties we share your Data with. This ensures your Data is treated by those third parties in a way that is consistent with the Data Protection Laws.

Please contact us if you want further information on the specific mechanism used by us when transferring your Data out of the UK.

7. Data security

Unfortunately, the transmission of information via the internet is not completely secure. Although we will take reasonable steps to protect your Data, we cannot guarantee the security of your Data transmitted to our site; any transmission is at your own risk.

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

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

8. Data retention

How long will you use my Data for?

We will only retain your 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 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 Data, we consider the amount, nature and sensitivity of the Data, the potential risk of harm from unauthorised use or disclosure of your Data, the purposes for which we process your Data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting, or other requirements.

In some circumstances you can ask us to delete your Data: see [your legal rights](#) below for further information.

In some circumstances we will anonymise your 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.

9. Your legal rights

Under certain circumstances, you have rights under Data Protection Laws in relation to your Data. If you wish to exercise any of the rights set out below, please contact us at rosie@starscreamcommunications.co.uk.



STARSCREAM

Request access to your Data (commonly known as a "Data subject access request"). This enables you to receive a copy of the Data we hold about you and to check that we are lawfully processing it.

Request correction of the Data that 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.

Request erasure of your Data. This enables you to ask us to delete or remove Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Data to comply with local law. 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.

Object to processing of your Data where we are 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 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.

Request restriction of processing of your Data. This enables you to ask us to suspend the processing of your Data in the following scenarios:

- If you want us to establish the Data's accuracy.
- Where our use of the Data is unlawful, but you do not want us to erase it.
- Where you need us to hold the Data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your Data, but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your Data to you or to a third party. We will provide to you, or a third party you have chosen, your Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your 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 products or services to you. We will advise you if this is the case at the time you withdraw your consent.



STARSCREAM

No fee usually required

You will not have to pay a fee to access your 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.

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 Data (or to exercise any of your other rights). This is a security measure to ensure that 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.

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.

10. Glossary

Data Protection Laws means all applicable legislation in force from time to time in the United Kingdom applicable to data protection and privacy including, but not limited to, the UK GDPR; the Data Protection Act 2018 (and regulations made thereunder); and the Privacy and Electronic Communications Regulations 2003 as amended.

LAWFUL BASIS

Consent means when you freely provide a specific, informed and unambiguous indication of your wishes through a written statement or clear affirmative action, inter alia, to being contacted by our marketing teams, or being asked to participate in a market research project which would be collected on our behalf by us.

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 Data for our legitimate interests. We do not use your 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 obligation means processing your Data where it is necessary for compliance with a legal obligation that we are subject to.



STARScream

THIRD PARTIES

External Third Parties

- Service providers acting as processors who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors, and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstance.