

# Privacy Notice

This notice applies to all websites & applications (including Forum) developed and delivered by 448 Studio. 448 Studio is a registered company incorporated in Scotland under company number SC560399 and has a registered office at Barclays Eagle Labs, Beco Building, 58 Kingston Street, Glasgow, G5 8BP. All significant decisions about data processing and policy implementation will be made using UK GDPR (General Data Protection Regulation). This notice is set out to help you understand the types of data that we collect from you, and/or your business, and how that data is used and managed.

## Commitment

448 Studio are committed to protecting the privacy and security of your personal data. We continually monitor compliance through implementing policies & procedures to safeguard data and by setting regular reviews to manage these policies and procedures.

## Data Controller

In accordance with ICO requirements of Data Controllers 448 Studio is registered with the Information Commissioners Office (ZB171646). 448 Studio provides products and services to universities & the public sector, including academic support programs, training workshops, consultancy & Forum Software. 448 Studio will have several roles such as Data Controller, Joint Controller & Processor. This will be defined by contractual agreements.

## About Us

448 Studio's core mission is to share knowledge and empower people to learn how to use social and digital media effectively. We offer social media workshops, training, consultancy & Forum software that supports the public sector and higher education. We work with research and academic groups to ensure they have all the tools and confidence to share their research and knowledge effectively.

## Information we collect.

### *Website & Forum*

#### **Personal information you disclose to us.**

We collect personal information that you voluntarily provide to us when you register on the Website, express an interest in obtaining information about us or our products and Services, when you participate in activities on the Website (such as by posting messages in our online forums or entering competitions, contests or giveaways) or otherwise when you contact us.

The personal information that we collect depends on the context of your interactions with us and the Website, the choices you make and the products and features you use. The personal information we collect may include the following:

**Personal Information Provided by You.** We collect names; phone numbers; email addresses; mailing addresses; job titles; usernames; passwords; contact preferences; contact or authentication data; billing addresses; debit/credit card numbers; personal picture; company/organisation; and other similar information.

**Payment Data.** 448 will only collect residual data collect data necessary to process your payment if you make purchases or make donations such as transaction number amount. All payment data is stored by Stripe. Your card information is collected and processed through Stripe directly from our websites and platforms. You will find their privacy notice link(s) here: <https://stripe.com/privacy>.

#### **Information automatically collected.**

Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our website.

We automatically collect certain information when you visit, use or navigate the Website. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our website and other technical information. This information is primarily

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needed to maintain the security and operation of our website, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

The information we collect includes:

- **Log and Usage Data.** Log and usage data is service-related, diagnostic, usage and performance information our servers automatically collect when you access or use our Website and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type and settings and information about your activity in the Website (such as the date/time stamps associated with your usage, pages and files viewed, searches and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps') and hardware settings).
- **Device Data.** We collect device data such as information about your computer, phone, tablet or other device you use to access the Website. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model Internet service provider and/or mobile carrier, operating system, and system configuration information.
- **Location Data.** We collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Website. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. Note however, if you choose to opt out, you may not be able to use certain aspects of the Services.

'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. example, we use cookies to store your country preference. This helps us to improve our website and deliver a better, more personalised service. It is possible to switch off cookies by setting your browser preferences. Turning cookies off may result in a loss of functionality when using our websites.

If you would like to opt-out of Google Analytics monitoring your behaviour on our website, please use this link (<https://tools.google.com/dlpage/gaoptout/>)

## 3<sup>rd</sup> Parties

Our websites & information we share around events & involving stakeholders may contain links to other websites run by other organisations. For example, we use a 3<sup>rd</sup> party payment service provider for ticket purchases. When you sign up to an event you will be directed to the payment providers website and once your transaction has been completed, you will be returned to 448 Studio's website. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website. In addition, if you linked to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

## Social Media

448 Studio can be found on social media platforms such as Facebook, Instagram, Twitter and LinkedIn, Eventbrite & Meetup. These platforms are an important part of our business efforts, so you may be presented with retargeting ads & emails in future following a visit to our website. We may target ads at audiences that we believe match the profile of our target audience and would therefore be interested in our services. We may tag or mention you when we are carrying out business promotion /collaborations.

These platforms are run by commercial companies and 448 Studio is not the Data Controller or Data Processor of your social/professional media profile. You should contact these social media platforms directly if you have concerns over how your personal data is being used and stored by them.

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## **Seminars & Workshops**

We collect and process the following information:

<ul style="list-style-type: none"><li>● First Name &amp; Surname</li><li>● Email Address</li><li>● University</li><li>● Academic Objectives</li><li>● Academic Achievements</li><li>● Event attendance</li></ul>	<ul style="list-style-type: none"><li>● IP Address</li><li>● In event location</li><li>● Statistical B2B Communication</li><li>● News</li><li>● Videos</li></ul>
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## **Donations**

When you make a donation to us, we need to collect some of your personal information. This is done through our on-line donation portal on Forumm. We'll always collect, use, and store your data responsibly, and make sure your data is protected. The information we collect when you donate is name, contact details and payment details. This information is then passed on to our payment platform for donations, which is hosted by Stripe ([Privacy Notice](#)). When you use our secure online payment function you will be directed to Stripe, who will receive your financial information to process the transaction. We will not directly store your financial details as needed for these transactions. We will provide your personal information to Stripe only to the extent necessary for the purpose of processing your payment.

We do not share your data with third parties for marketing purposes, however we will share your details with universities we collaborate with or are working on behalf of and in circumstances where the university is the data controller. Our lawful basis for processing your data in these circumstances is contractual.

## **How we use your information**

We process your information for purposes based on legitimate business interests, the fulfilment of our contract with you, compliance with our legal obligations, and/or your consent.

We use personal information collected via our website for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

### **We use the information we collect or receive:**

- To facilitate account creation and logon process. If you choose to link your account with us to a third-party account (such as your Google or Facebook account), we use the information you allowed us to collect from those third parties to facilitate account creation and logon process for the performance of the contract.
- To post testimonials. We post testimonials on our website that may contain personal information. Prior to posting a testimonial, we will obtain your consent to use your name and the content of the testimonial. If you wish to update, or delete your testimonial, please contact us at [hello@forumm.to](mailto:hello@forumm.to) and be sure to include your name, testimonial location, and contact information.
- Request feedback. We may use your information to request feedback and to contact you about your use of our website.
- To enable user-to-user communications. We may use your information in order to enable user-to-user communications with each user's consent.
- To manage user accounts. We may use your information for the purposes of managing our account and keeping it in working order.
- To send administrative information to you. We may use your personal information to send you product, service, and new feature information and/or information about changes to our terms, conditions, and policies.
- To protect our Services. We may use your information as part of our efforts to keep our website safe and secure (for example, for fraud monitoring and prevention).
- To enforce our terms, conditions, and policies for business purposes, to comply with legal and regulatory requirements or in connection with our contract.

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- To respond to legal requests and prevent harm. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- Fulfil and manage your orders. We may use your information to fulfil and manage your orders, payments, returns, and exchanges made through the website.
- Administer prize draws and competitions. We may use your information to administer prize draws and competitions when you elect to participate in our competitions.
- To deliver and facilitate delivery of services to the user. We may use your information to provide you with the requested service.
- To respond to user enquiries/offer support to users. We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Services.\
- To send you marketing and promotional communications. We and/or our third-party marketing partners may use the personal information you send to us for our marketing purposes if this is in accordance with your marketing preferences. For example, when expressing an interest in obtaining information about us or our website, subscribing to marketing or otherwise contacting us, we will collect personal information from you. You can opt-out of our marketing emails at any time.
- Deliver targeted advertising to you. We may use your information to develop and display personalised content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness.
- For other business purposes. We may use your information for other business purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our website, products, marketing, and your experience. We may use and store this information in aggregated and anonymised form so that it is not associated with individual end users and does not include personal information. We will not use identifiable personal information without your consent.

## Who are our Stakeholders?

Clients, Universities, Associates, Delegates, Supporting Organisations, Suppliers, Statutory & Regulatory Bodies

## International

448 Studio has global reach delivering services to individuals from around the world who are undertaking further education in the academic sector. These Colleges & Universities may not be in the same country that they reside. 448 workshop events are online and in person Attendees may be from countries from around the world. Due to this It is likely we will transfer, store, and process your information in countries other than your own.

Our servers are located in United Kingdom, Ireland, and United States. If you are accessing our website from outside United Kingdom, Ireland, and United States, please be aware that your information may be transferred to, stored, and processed by us in our facilities and by those third parties with whom we may share your personal information worldwide, and other countries. We will take all necessary measures to protect your personal information in accordance with this privacy notice and applicable law.

All significant decisions about data processing and policy implementation will be made using UK GDPR & EU GDPR. We take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

## Lawful Basis

We apply the GDPR principles to all personal & Sensitive data that we hold or process.

- 1) Processed lawfully, fairly and in a transparent manner in relation to individuals.
- 2) Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be incompatible with the initial purposes.

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- 3) Adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.
- 4) Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased, or rectified without delay.
- 5) Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals.
- 6) Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

Under the General Data Protection Regulation (The GDPR) we rely on consent for processing your personal information. Individual consent is provided by you when browsing our websites and when registering & attending events virtually or in person. Some of our business-to-business events use contractual basis and Legitimate basis depending on the job role and relationship you have with 448 Studio.

## Sharing Information

We use third party hosting for this website and associated data processing is carried out only to provide you with user friendly functionality.

We will share names, email addresses, pictures, job roles and organisational information as part of business-to-business networking events & with organisations & contractors commissioned to assist & co-ordinate these events.

Pre & post event/online seminar management will include grouped online communications such as meeting invites in meeting chats and document sharing. Others attending may see your name email address and may see conversation responses and questions you may ask.

Where an Organisation has commissioned us to host an online seminar or event, your registration & attendance information & any feedback you provide will be shared with this Organisation.

As part of our virtual event experience, we may operate external online random name pickers for our competition prize draws which involve adding your name for entry.

We use contractors & associates to manage various business processes, we will share your information with them to carry out this function.

We may be required to transfer your information to a third party as part of a sale of some or all our business assets to third party as part of any business restructuring or reorganisation.

We may also be required to disclose or share your personal data to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our supporters and customers. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

## Children

We do not anticipate providing services directly to children, however we do understand that if this change occurs, we will make provisions to verify age. We will also make further provisions to gain parental or guardian consent for data processing activity where required.

## Protecting your personal information

448 Studio will continue to look for new ways to protect data. However, in the event of a data breach we will notify the ICO (Information Commissioners Office) within 72 hours of becoming aware of the breach. Where we do not yet have all the relevant details, we will notify you when we expect to have

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the results of the investigation. We use the ICO guidance framework on managing a security breach to guide us.

## Your data protection rights.

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances.

**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, in certain circumstances.

**Your right to object to automated decision making** – You have the right not to be subject to the use of entirely automated decisions which produce legal effects or significantly affect individuals.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at [hello@forumm.to](mailto:hello@forumm.to) or

**Barclays Eagle Labs,**

**Beco Building**

**58 Kingston Street**

**Glasgow**

**G5 8BP**

if you wish to make a request.

## Regulatory Information

Further information around your rights can be found at <https://ico.org.uk/your-data-matters>

The ICO's address:

**Information Commissioner's Office**

**Wycliffe House**

**Water Lane**

**Wilmslow**

**Cheshire**

**SK9 5AF**