

Privacy Policy

1. Who We Are

[Business Name] ("we", "us", "our") is the data controller responsible for your personal data collected through our Audience Blueprint service.

2. What Data We Collect

We collect personal data when you apply for an Audience Blueprint. The data we collect includes:

- a) Application Data: i. Name ii. Email address iii. Business name iv. Industry v. Target audience information vi. Offer details vii. Price point
- b) Transaction Data: i. Payment confirmation ii. Purchase history
- c) Technical Data: i. IP address ii. Browser type
- d) We do not collect special category data (such as health, race, ethnicity, religious beliefs, or political opinions).

3. How We Use Your Data

- a) To provide the Blueprint service: i. Review and process your application ii. Create and deliver your customized Blueprint iii. Process payment iv. Communicate with you about your application and delivery
- b) Legal and administrative requirements: i. Maintain tax and financial records as required by HMRC ii. Comply with legal obligations
- c) Business communications: i. Send you information about additional services or exclusive offers (existing customers only, with the ability to opt out at any time)
- d) You can opt out of receiving business communications at any time by clicking "unsubscribe" in any email or by contacting us directly.

4. Who We Share Your Data With

- a) We use the following service providers to operate our business: i. Tally.so (Belgium, EU): Application forms and data collection ii. Google Workspace (USA): Email communication and document delivery iii. Stripe (USA): Payment processing iv. Webflow (USA): Website hosting v. Notion (USA): Internal business operations and record-keeping.
- b) We do not sell your personal data to third parties. c) In certain circumstances, we may share your data with: i. Professional advisors (accountants, lawyers) bound by confidentiality obligations ii. Public authorities if legally required

5. International Transfers

- a) Some of our service providers are based outside the UK:
- b) EU locations (Tally): Covered by UK adequacy regulations, meaning your data receives the same level of protection as in the UK.
- c) USA locations (Google, Stripe, Webflow, Notion): These providers are certified under the EU-U.S. Data Privacy Framework and its UK Extension, ensuring adequate protection of your data. You can verify their certification status at <https://www.dataprivacyframework.gov/list>

6. How Long We Keep Your Data

We retain your personal data for the following periods:

- a) Unsuccessful applications (no payment made): Deleted within 30 days of application review.
- b) Customer transaction and delivery records: Retained for 6 years from the date of your final transaction, in accordance with HMRC tax requirements.
- c) Email correspondence: Retained for 3 years from the date of last contact to maintain customer service records.
- d) Cancelled or refunded projects: Financial records retained for 6 years from the date of cancellation to comply with tax regulations.
- e) After these periods, your data is securely deleted unless we have a legal obligation to retain it longer.

7. Your Rights

Under UK data protection law, you have the right to:

- a) Under UK data protection law, you have the right to:
 - i. Access your personal data - request what information we hold about you
 - ii. Correct inaccurate data - ask us to update incorrect information
 - iii. Delete your data - request erasure (subject to legal retention requirements - we must keep financial and tax records for 6 years under HMRC regulations)
 - iv. Object to processing - object to processing based on legitimate interests
 - v. Restrict processing - request that we limit how we use your data
 - vi. Data portability - receive your data in a usable format
 - vii. Withdraw consent - withdraw consent at any time (where consent is the lawful basis)
 - b) To exercise any of these rights, contact us at theteam@nichered.com. We will respond within one month.
 - c) Automated Decision-Making We do not use automated decision-making or profiling when reviewing applications or providing services. All applications are reviewed manually.
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8. Data Security

- a) We protect your data using: i. Two-factor authentication on all business accounts ii. Encrypted data transmission (HTTPS/TLS) for all web forms and communications iii. Access restricted to authorized personnel only on a need-to-know basis iv. Secure cloud-based storage with reputable providers v. Regular review of our service providers' security practices.
- b) While we take security very seriously and implement industry-standard measures to protect your data, no method of transmission over the internet is 100% secure. Any data sent to us is at your own risk, though we take all reasonable steps to protect it.
- c) Data Breaches: If we discover a data breach that affects your personal data, we will: i. Assess the impact of the breach ii. Notify you and the ICO if required by law iii. Investigate the cause iv. Take steps to prevent future breaches

9. Cookies

- a) Our website does not use analytics, advertising, or tracking cookies.
- b) Our application forms are hosted by Tally.so, which may use essential functional cookies for the forms to work properly. For information about Tally's cookie usage, see their privacy policy at <https://tally.so/help/privacy-policy>
- c) You can control cookies through your browser settings, though disabling cookies may prevent the application form from functioning correctly.

10. COMPLAINTS

- a) If you are unhappy with how we handle your data, please contact us first so we can resolve the issue.
- b) You also have the right to complain to the Information Commissioner's Office (ICO): i. Website: ico.org.uk/make-a-complaint ii. Phone: 0303 123 1113

11. Changes to This Policy

- a) We may update this privacy policy from time to time. Any changes will be posted on this page with an updated revision date.
- b) By continuing to use our services after changes are made, you agree to the updated privacy policy.

12. Contact Us

If you have any questions about this privacy policy or how we handle your data, contact us at: theteam@nichered.com

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