

Privacy Policy of Unlocked. Agency

Last updated: September 2026

1. Introduction

Unlocked. Agency ("Unlocked. Agency", "we", "us" or "our"), located at Hoofdstraat 43, 5481 AA Schijndel, the Netherlands, provides marketing, advertising, strategy, creative and related services.

In connection with our website, business activities and Services, we may collect and process personal data.

We consider the careful handling and protection of personal data to be important. We process personal data in accordance with applicable privacy legislation, including the General Data Protection Regulation ("GDPR").

This Privacy Policy explains what personal data we collect, why we collect it, how we use it, how long we retain it, with whom it may be shared and what rights you have in relation to your personal data.

This Privacy Policy applies to our website, communications with us and the Services provided directly by Unlocked. Agency.

2. Who is responsible for your personal data?

Unlocked. Agency is the controller of personal data that we collect and process for our own business purposes.

Unlocked. Agency

Hoofdstraat 43
5481 AA Schijndel
The Netherlands
Chamber of Commerce number: 88606708

For privacy related questions or requests, you may contact us using the contact details provided on our website.

Where Unlocked. Agency processes personal data solely on behalf of one of its Clients, the Client will generally be the controller and Unlocked. Agency will act as a processor. This is explained further in Article 12 of this Privacy Policy.

3. Personal data we may collect

Depending on how you interact with us and which Services are used, we may process the following categories of personal data:

Identification information

Such as:

- first name
- last name
- company name
- job title or position

Contact information

Such as:

- email address
- telephone number
- business address
- postal address

Financial and administrative information

Such as:

- billing information
- VAT number
- bank account information
- payment information
- invoices and payment status

Online and technical information

Such as:

- IP address
- browser information
- device information
- cookie identifiers
- website usage
- pages viewed
- interactions with our website
- referral information

Marketing and advertising information

Where applicable, we may collect information relating to interactions with our advertisements, campaigns and website.

This may include information about advertisements viewed or clicked, website visits and conversion information.

Account and access information

Where necessary to provide our Services, we may receive or process:

- account identifiers
- login details
- access permissions
- social media account information
- advertising account information

We will only use this information where necessary to provide the agreed Services.

Images and audiovisual material

We may process photographs, videos or other audiovisual material from which an individual can be identified where such material is voluntarily supplied to us or is necessary for the Services.

Communications

We may process information that you voluntarily provide when you:

- contact us
 - request information
 - schedule a meeting
 - submit a contact form
 - become a Client
 - communicate with us by email, telephone or another communication channel
 - provide feedback or opinions
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4. How we collect personal data

We may collect personal data directly from you, for example when you:

- contact us through our website
- send us an email
- schedule a meeting
- enter into an Agreement with us
- subscribe to marketing communications
- communicate with us through social media
- otherwise provide information to us

We may also receive personal data from:

- the company or organisation you work for
- our Clients
- business partners
- advertising and analytics platforms
- publicly available business sources
- service providers used in connection with our website and Services

Where we obtain personal data from sources other than directly from you, we process such information only where we have a valid legal basis to do so.

5. Why we process personal data

We may process personal data for the following purposes.

Providing our Services

We process information where necessary to:

- prepare and perform Agreements
- communicate with Clients
- manage projects
- provide marketing and advertising Services
- provide strategic advice
- manage advertising campaigns
- perform agreed website, creative or email marketing activities
- provide support

The legal basis for this processing is generally the performance of an Agreement or taking steps at your request before entering into an Agreement.

Communication and enquiries

We process personal data to:

- answer enquiries
- respond to contact requests
- schedule meetings
- provide requested information
- communicate about potential cooperation

Our legal basis may be our legitimate interest in conducting and developing our business or taking steps prior to entering into an Agreement.

Administration and invoicing

We process personal data to:

- prepare and send invoices
- process payments
- maintain our financial administration
- comply with accounting and tax obligations

The legal basis is the performance of our Agreement and compliance with legal obligations.

Marketing and business development

We may process business contact information to:

- contact potential Clients
- maintain relationships with existing or potential Clients
- inform you about relevant Services
- send marketing communications where permitted

Depending on the circumstances, this processing is based on consent or our legitimate interest in marketing and developing our business.

You may object to direct marketing at any time.

Email newsletters

Where you subscribe to our newsletter or other marketing emails for which consent is required, we process your contact information on the basis of your consent.

You may withdraw your consent at any time, for example by using the unsubscribe option included in the relevant communication.

Withdrawal of consent does not affect the lawfulness of processing carried out before consent was withdrawn.

Website analytics and optimisation

We may process website usage and technical information to:

- understand how visitors use our website
- improve the website
- analyse website performance
- identify technical problems
- improve our Services

Depending on the technology used, this processing may be based on our legitimate interests or your consent.

Advertising and remarketing

Where you have provided the required consent, we may use marketing and tracking technologies to:

- measure advertising performance
- understand conversions
- create audiences
- show relevant advertisements
- perform remarketing

This may include the use of advertising services such as Google Ads or similar advertising platforms.

Where consent is legally required, these technologies will only be activated after consent has been provided.

Security and fraud prevention

We may process technical and other information where necessary to:

- protect our systems
- prevent abuse
- prevent spam
- detect security incidents
- protect our website and Services

This processing is based on our legitimate interest in operating and protecting our business and Services securely.

6. Legal bases for processing

Depending on the circumstances, Unlocked. Agency processes personal data on one or more of the following legal bases:

Performance of an Agreement

Processing is necessary to enter into or perform an Agreement with you or your organisation.

Legal obligation

Processing is necessary to comply with legal obligations applicable to Unlocked. Agency, including tax and administrative obligations.

Legitimate interests

We may process personal data where this is necessary for our legitimate business interests and those interests are not overridden by your rights and freedoms.

These legitimate interests may include:

- operating and developing our business
- communicating with Clients and prospects
- improving our website and Services
- protecting our systems
- preventing fraud and abuse
- maintaining business relationships
- conducting appropriate business to business marketing

Consent

Where required, we process personal data on the basis of your consent.

You may withdraw your consent at any time.

7. Retention of personal data

We do not retain personal data for longer than necessary for the purpose for which it was collected, unless a longer retention period is required by law.

The applicable retention period depends on the type of information and the purpose for which it is processed.

In general:

Client and contractual information

Information necessary for the performance and administration of a Client relationship may be retained for the duration of the relationship and thereafter for as long as reasonably necessary for administrative, legal or evidential purposes.

Financial administration

Invoices and information forming part of our financial administration are generally retained for at least seven years where required under Dutch tax legislation.

Enquiries and prospective Clients

Information relating to enquiries and potential cooperation will not be retained longer than reasonably necessary for the purpose for which it was collected.

Marketing communications

Where personal data is processed for email marketing based on consent, we may retain the relevant information until you withdraw your consent or unsubscribe.

We may retain limited information afterwards where necessary to ensure that your marketing preferences continue to be respected.

Personal data processed on behalf of Clients

Where we act as a processor for a Client, the applicable retention period is generally determined by the Client and the applicable data processing agreement.

When personal data is no longer required, it will be deleted, anonymised or otherwise removed where reasonably possible, unless continued retention is required by law.

8. Your privacy rights

Subject to the conditions and limitations of the GDPR, you may have the following rights.

Right of access

You have the right to request information about the personal data we process about you and to request a copy of that data.

Right to rectification

You may ask us to correct inaccurate or incomplete personal data.

Right to erasure

In certain circumstances, you may request deletion of your personal data.

Right to restriction of processing

In certain circumstances, you may request that we temporarily restrict the processing of your personal data.

Right to data portability

Where applicable, you may request to receive personal data you have provided to us in a structured, commonly used and machine readable format.

Right to object

Where we process personal data on the basis of legitimate interests, you may have the right to object to such processing.

You have the right to object to processing for direct marketing purposes at any time.

Right to withdraw consent

Where processing is based on consent, you may withdraw that consent at any time.

Withdrawal does not affect the lawfulness of processing before consent was withdrawn.

Right to lodge a complaint

If you believe that we are processing your personal data unlawfully, you have the right to lodge a complaint with a competent supervisory authority.

In the Netherlands, the supervisory authority is the **Autoriteit Persoonsgegevens**.

You are welcome to contact us first so that we have the opportunity to address your concern.

We may ask you to provide reasonable information to verify your identity before processing a privacy request.

We will respond to requests within the time periods required by applicable law.

9. Sharing personal data with third parties

We do not sell personal data.

We may share personal data with third parties where this is necessary for the purposes described in this Privacy Policy.

These parties may include:

- hosting and website providers
- analytics providers
- advertising platforms
- email and communication providers
- CRM and project management providers
- payment and accounting providers
- IT and security providers
- professional advisers
- freelancers, contractors and other service providers involved in providing our Services
- government authorities where legally required

Where a third party processes personal data on our behalf as a processor, we will enter into appropriate contractual arrangements where required by the GDPR.

We may also disclose personal data if required by law, a court order or a competent government authority.

10. International transfers of personal data

Some of the service providers and platforms we use may process personal data outside the European Economic Area ("EEA").

Where personal data is transferred outside the EEA, we will take appropriate measures as required by applicable data protection legislation.

Depending on the recipient and destination, such measures may include:

- an adequacy decision adopted by the European Commission
- the EU US Data Privacy Framework where the relevant United States organisation participates in that framework
- Standard Contractual Clauses approved by the European Commission
- other legally permitted transfer mechanisms

Where required, we will take additional measures to ensure an appropriate level of protection for personal data.

11. Analytics

We may use analytics technologies to understand how visitors interact with our website.

This information may include:

- pages visited
- duration of visits
- interactions with website elements
- browser and device information
- approximate location information
- referral sources
- IP address or shortened or pseudonymised versions of an IP address

Where possible and appropriate, analytics information will be aggregated, pseudonymised or otherwise minimised.

Where analytics technologies require consent under applicable law, they will only be used after such consent has been provided.

12. Personal data processed on behalf of our Clients

As a marketing agency, Unlocked. Agency may process personal data on behalf of its Clients.

For example, this may occur when we assist Clients with:

- advertising campaigns
- lead generation
- email marketing
- CRM activities
- website optimisation
- analytics and tracking
- marketing automation
- audience management

In these situations, the Client generally determines why and how personal data is processed and therefore acts as the controller.

Unlocked. Agency generally acts as a processor and processes the personal data in accordance with the Client's instructions and the applicable data processing agreement.

If you wish to exercise privacy rights relating to personal data processed by Unlocked. Agency solely on behalf of one of our Clients, you should generally contact the relevant Client directly.

Where appropriate, we will assist our Client with responding to such requests in accordance with our contractual and legal obligations.

13. Cookies and similar technologies

Our website may use cookies and similar technologies.

Cookies are small files stored on or accessed through your device when you visit a website.

We may use the following categories of cookies.

Necessary cookies

These cookies are necessary for the proper functioning and security of the website.

They may be used, for example, for:

- basic website functionality
- security
- spam prevention
- remembering privacy preferences
- technical website functionality

Where legally permitted, these cookies may be placed without prior consent.

Analytics cookies

Analytics cookies help us understand how visitors use our website so that we can analyse and improve its performance.

Where consent is required for particular analytics technologies, these cookies will only be placed after you have provided consent.

Marketing and tracking cookies

Marketing and tracking technologies may be used to:

- measure advertising campaigns
- track conversions
- understand visitor behaviour
- create advertising audiences
- show personalised advertisements
- perform remarketing

Where required by law, marketing and tracking cookies will only be placed after you have provided consent.

At your first visit, you may be asked to choose which non essential cookies you wish to accept.

You can withdraw or change your consent at any time through the cookie settings available on our website, where implemented.

You can also configure your browser to block or delete cookies. Please note that blocking certain cookies may affect the functionality of the website.

14. IP addresses and server logs

When you use our website, certain technical information may automatically be recorded in server logs.

This information may include your IP address, browser information, date and time of access and requested pages.

We may process this information where necessary for:

- website operation
- security
- detecting abuse
- diagnosing technical problems
- maintaining system integrity

Server log information will not be used to identify individuals unless this is necessary for security, fraud prevention, legal compliance or another legitimate purpose.

15. Security

We take appropriate technical and organisational measures designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access.

Depending on the circumstances, such measures may include:

- access controls
- password protection
- multifactor authentication
- encrypted connections
- restricted access based on business need
- secure cloud based systems
- appropriate backup and security procedures
- periodic review of access rights and security measures

No method of electronic transmission or storage is completely secure. We therefore cannot guarantee absolute security, but we take reasonable measures appropriate to the nature and risks of the personal data we process.

16. Third party websites and services

Our website and Services may contain links to third party websites, platforms, applications, integrations or services.

This Privacy Policy does not apply to personal data processed independently by those third parties.

We are not responsible for the privacy practices of third parties acting as independent controllers.

We encourage you to review the privacy policies of any third party websites or services you use.

Where we use a third party as a processor on our behalf, our use of that party is subject to the requirements described elsewhere in this Privacy Policy.

17. Changes to this Privacy Policy

We may amend this Privacy Policy from time to time, for example where:

- our Services change
- our website changes
- we use new technologies or service providers
- legal requirements change

The most recent version will be made available through our website.

Where appropriate, the date at the top of this Privacy Policy will be updated to reflect the latest revision.

18. Contact

If you have questions about this Privacy Policy, the processing of your personal data or wish to exercise one of your privacy rights, you may contact:

Unlocked. Agency

Hoofdstraat 43

5481 AA Schijndel

The Netherlands

Chamber of Commerce number: 88606708

Email: **hello@unlocked-agency.com**