

Privacy Policy

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Privacy Statement Summary:

At SevenSix Agency Limited ("We" or "Us" or "our") we take the protection of your personal data seriously. This Privacy Policy explains how your information is collected, used, and disclosed by us. As a Data Controller, we determine the purposes and means of processing your personal data, whether you are a website visitor, service user, influencer, writer on our blog, client, or partner.

Who will use my data?	SevenSix Agency Limited
Who are we?	SevenSix Agency Limited is an influencer marketing agency with focus on diversity and inclusion. The agency provides consultancy services to brands and influencers, centred around representation in advertising and how to create purpose-led campaigns that generate a positive impact. It runs an influencer partnerships and management division with the sole goal of amplifying the visibility and work of some of the globe's most exciting yet overlooked content creators and their unique perspectives.
What for?	As an Influencer Marketing & Talent Management Agency with a focus on Inclusive Marketing, we process data for a number of reasons. The main reason is to provide our clients and influencers with personalised, relevant, and valuable services.
	We process information such as social media following and engagement metrics, contact information, demographic data, etc. to match influencers with brands and campaigns that align with their interests and audience. This helps us to ensure that our influencers are well-suited to the campaigns they are working on and that our clients are reaching the right audience.
	Additionally, we process data to comply with legal and regulatory requirements, to protect our clients and influencers interests, and to keep our records up to date.
	As per our legal obligations, we may need to send details to relevant authorities or any other organisation that requires them by law.
How do we collect your personal data?	We collect personal data in several ways, all of which are transparent and lawful.
	The most common way we collect personal data is when you provide it to us directly, for example by filling out a form on our website, or by providing your contact information during a phone call, on email or during a meeting.

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We also collect data through our interactions with you, such as through your use of our website, your participation in our campaigns or events, or by tracking your browsing habits. We may collect it through various means, such as:

- If you create a free account on our website as an influencer
- If you contact us as a client and decide to use our services
- If you enter your details in our "Contact us" form
- If you send use direct message through our social media platforms (Facebook, Twitter, Linkedin, Instagram)
- If you enter your information as a freelance writer on our "Send us your pitch" form
- Or based on the information collected by cookies and similar technologies when you visit our website

We may also collect data from third parties, such as social media platforms, or publicly available sources. In these cases, we make sure that we have the right to collect this information and that it is used for lawful and legitimate purposes.

We always make sure that we have obtained your explicit consent before collecting any personal data and that the data is relevant and necessary for the intended purpose. We always inform you about the data processing and your rights, and we keep the data secure.

What will happen if I contact you?

If you contact us, we will use the personal information you provide to respond to your inquiry, to provide you with any information or assistance you request, to send you updates about our services or to invite you to participate in events, and to keep a record of your contact and other information, always treating your personal information in accordance with our Privacy Policy and applicable laws and regulations.

We will keep a record of your contact information and any other information you provide to us in order to respond to your inquiry, to improve our services and to comply with legal and regulatory requirements.

If you prefer not to receive marketing communications from us, you can opt-out at any time by following the instructions in the communication or by contacting us directly.

The data we collect is used by SevenSix Agency Limited to provide our services to you. We may share your data with other companies / organisations / people as required to provide our services or operate our

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company; however, unless required to do so by law, we will not otherwise share, sell, or distribute any of the information you provide to us without your consent.

We may use your information in order to process and complete transactions, and to send related information, including transaction confirmations and invoices.

What data will be stored?

At SevenSix Agency, our purpose for collecting personal information from individuals is deeply rooted in inclusivity. We understand that every individual brings a unique perspective, experience, and set of needs to the table. By collecting personal information, we aim to share an environment where everyone feels valued, heard, and represented.

One aspect of our inclusivity approach involves providing our services and offerings to meet the diverse needs of our clients and partners. Personal information allows us to understand the specific preferences, interests, and requirements of each individual, enabling us to provide customised solutions that resonate on a personal level.

We respect the principles of processing personal information under the GDPR, so we always prioritise transparency. We aim to inform you about the purpose and types of data we collect through most of our forms. Typically, the personal information we gather via our forms includes the following:

- First name
- Last name
- Email
- Gender Identity
- Age
- Country of residence
- City of Residence
- Languages spoken
- Heritage
- Sexual Orientation (Optional)
- Medical condition (Optional)
- Social media account (Instagram, Facebook, Twitter, Linkedin, Pinterest, YouTube, TikTok)

If you contact us via our "contact us" form, we may collect information such as:

- First Name
- Last Name
- Email
- Company name

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If you choose to create a free account via our Influencers Network form, we may collect information such as:

- First Name
- Last Name
- Email
- Gender Identity
- Age
- Country of residence
- City of Residence
- Languages spoken
- Heritage
- Sexual Orientation (Optional)
- Medical condition (Optional)
- Social media account (Instagram, Facebook, Twitter, Linkedin, Pinterest, YouTube, TikTok)

If you choose to Join us as a CAP Creator on TikTok Shop, we may collect information such as:

- First Name
- Last Name
- Address
- Age
- Shoe size
- Top size
- Bottom size
- Dress size
- Food allergies

If you choose to send us your pitch as a freelancer or writer on our blog, we may collect information such as:

- First Name
- Last Name
- Email
- Gender Identity
- Country (Are you based in the UK or not)
- Biography (The text may contain sensitive information if the author chooses to include it voluntarily)

If you choose to use our services as an influencer, brand or agency, we may collect information such as:

- Contact details (name, last name, email address, physical information)
- Company information

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- Financial information (information about payments made between us and you as a client)
- Publicly available Information (information about articles that you've published)
- Social Media
- Any other information that you choose to share with us

If you become one of our signed talents, we may publish your photo and contact details on our Talent section on our website in order to get contacted by our clients and brands.

While visiting our website, we may collect information relating to your browsing activity, obtained using our cookies and similar technology.

When working with influencers, we may collect data such as their contact information, social media following, and engagement metrics. This data is collected in order to help us match influencers with brands and campaigns that align with interests and audience, which ultimately benefits the influencer by providing them with relevant and engaging opportunities.

We may collect sensitive data, like sexual orientation, gender identity and medical conditions from influencers. Where we collect sensitive data we always strive to ensure that the processing of data is done in a transparent, fair, and lawful manner. This includes obtaining the individual's consent before any data collection and processing is done, and providing them with clear information about the purpose of the data processing and the rights they have. We also ensure that the data is kept secure and that the individual can access, rectify, or delete their personal data at any time.

We will never use your data other than to provide our services, in order to operate and develop our company, and we assure you that we've met our obligations in accordance with the GDPR. The opt-out option is always available.

What data will be shared?

We will not share your data with any third parties other than as described here, to fulfil our obligations to you, operate and develop our company, and to protect our interests. We will only share any data that is particularly relevant to our process in order to provide the services that we offer. We may share your information with regulators or legal bodies that request it.

We will not share your data with any third parties other than as required to fulfil our contracts and as described here. We will only share any data that is particularly relevant to our process in order to provide the services that we offer.

As per our legal obligations, we may need to send details to relevant authorities or any other organisation that requires them by law.

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Who do we share data with?

We only share your data with trusted and relevant companies which ensure an adequate level of protection and where there is an appropriate agreement in place, which includes obligations in relation to the confidentiality, security, and lawful processing of any personal data shared with them.

We may share your data with third party vendors, consultants, and other service providers in order to perform tasks on our behalf. These third parties are website analytics companies, payment processing providers, CRM services providers, email service providers.

The third parties to whom we may provide your data are:

- Other organisations within SevenSix Agency Limited, where such disclosure is necessary to provide you with our services or to manage our business (e.g. the purposes of recruitment)
- Customers where required for specific business purposes, such as additional vetting procedures
- Banks and payment providers to authorise and complete payments.
- Credit reference agencies and organisations working to prevent fraud in financial services
- SevenSix Agency Limited third-party providers including information technology suppliers and infrastructure support services, law firms and other third party suppliers/partner organisations
- Service providers which assist in sending drafting and sending requested news and job alerts
- Third parties which perform the pre-employment checks, including relevant vetting services
- Professional advisors (e.g. legal advisors, insurance organisations and auditors)
- Government, regulatory and law enforcement bodies where we are required in order to comply with our legal obligations, to exercise our legal rights and for prevention, detection and investigation of crime

For example, we may share your personal data with trusted companies such as:

- PayPal and Stripe Payment services
- Slack, Whatsapp and Zoom Office communication services
- Typeform Content creation services
- Notion Workspace management

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	We may transfer your personal information to third parties in connection with a reorganisation, restructuring, merger, acquisition, sale or transfer of assets, or changing services suppliers provided that the receiving party agrees to treat your personal information in a manner consistent with this Privacy Policy.
How long?	Your data will be stored only for as long as strictly necessary to provide our services to our clients, to meet our obligations to you, and to meet our legal obligations.
	For more information, please contact us about our Data Retention Policy.
Who can access my data?	We will never sell, share, or otherwise distribute your data to any other third party other than as described here.
	We will share your information with any regulator or legal body that requests it as well as any parties relevant to the application process.
	We ensure access is restricted to only those persons authorised by us to access your data.
	Access to your data is strictly controlled. For more information, please contact us about our Information Security Policy
How is my data kept secure?	We will store your data on secure servers. We use industry standard security protocols/technology to secure your data.
	Where data is transferred from the UK and/or EU to other countries we will take all appropriate precautions to protect your data, including establishing DPA/SCCs and completing risk assessments.

About This Privacy Policy

This policy sets out how we will collect, store and process the information that you provide to us, information we collect as a result of our interaction, the information we collect about you from other sources, or information we service about you by using the information we hold.

The General Data Protection Regulation (GDPR) describes how organisations must collect, handle, process, and store personal information. These rules apply regardless of whether data

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is stored electronically, on paper or on other materials. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully. GDPR is underpinned by eight important principles. These say that personal data must:

- Be processed fairly and lawfully
- Be obtained only for specific, lawful purposes
- Be adequate, relevant, and not excessive
- Be accurate and kept up to date
- Not be held for any longer than is necessary
- Processed in accordance with the rights of the data subjects
- Be protected in appropriate ways
- Not be transferred outside the UK, unless that country or territory also ensures an adequate level of protection

We take these responsibilities seriously; this document describes our approach to data protection.

This policy helps to protect us from data security risks, including:

- Breaches of confidentiality. For instance, information being given out inappropriately.
- Failing to offer choice. For instance, all individuals should be free to choose how the company uses data relating to them.
- Reputational damage. For instance, the company could suffer if hackers successfully gained access to sensitive data.
- Any other risks inherent in the collection, storage, or processing of your data

Who We Are And How To Contact Us

SevenSix Agency Limited is registered in the UK and is registered with the Information Commissioner's Office. The Data Protection Lead is Charlotte Stavrou. You can contact us in any of the following ways:

Charlotte Stavrou
charlotte@sevensixagency.com
SevenSix Agency Limited

167-169 Great Portland Street, 5th Floor, London, England, W1W 5PF

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Who this privacy policy applies to

This policy relates to data subjects of SevenSix Agency Limited including clients, customers, suppliers, partners, employees, influencers, writers and all other individuals that choose to share their personal data with us. Processing of your data is required in order to offer you our services and to run our company. It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the GDPR. This can include:

- Names of Individuals
- Contact details
- Postal addresses
- Email Addresses
- Telephone numbers
- Gender Identity
- Age
- Country of residence
- Sexual Orientation
- Medical information
- Financial information
- Criminal convictions or pending legal actions against you
- Any other information relating to individuals as required to provide our services and to run and develop our company

What this policy applies to

This section describes the lawful basis for processing your data and applies to the information about yourself that you choose to provide us with or that you allow us to collect. This includes:

- The Information you provide when you contact us
- When you contact us in order to discuss using our services
- Information we collect about how you use the website
- Information relating to services we offer to you and other transactions including financial and other personal information required to complete these transactions

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- Information that is given and stored as part of our ongoing relationship
- Information we collect as a result of our interaction,
- The information we collect about you from other sources,
- or information we service about you by using the information we hold.

We collect sensitive data, like sexual orientation, gender identity and medical conditions from influencers. Where we collect sensitive data, we always strive to ensure that the processing of data is done in a transparent, fair, and lawful manner. This includes obtaining the individual's consent before any data collection and processing is done and providing them with clear information about the purpose of the data processing and the rights they have. We also ensure that the data is kept secure and that the individual can access, rectify, or delete their personal data at any time.

How your information will be used

We will only use your personal data for the purposes for which we collected it and as you would reasonably expect your data to be processed and only where there is a lawful basis for such processing, for example:

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new customer	(a) Identity, (b) Contact	(a)Performance of a contract with you (b) Consent (c) In our legitimate interest
To process and deliver the products and services you request including digital signages, and to manage payments, fees and charges.	(a) Identity,(b) Contact,(c) Financial,(d) Transaction,(e) Marketing andCommunications	(a) Performance of a contract with you,(b) Necessary for our legitimate interests to recover debts owed to us(b) Consent
To manage our ongoing relationship with you which will include notifying you	(a) Identity, (b) Contact, (c) Profile,	(a) Performance of a contract with you,(b) Necessary to comply with a legal

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about changes to our terms, services or privacy policy, to maintain our records	(d) Marketing and Communications	obligation, (c) Necessary for our legitimate interests to keep our records updated and to study how customers use our services (d) Consent
To administer and protect our business and our site (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, to prevent fraud and in the context of a business reorganisation or group restructuring exercise, (b) Necessary to comply with a legal obligation (c) Consent
To use data analytics to improve our website, services, marketing, customer relationships and experiences	(a) Technical, (b) Usage	(a)Necessary for our legitimate interests to define types of customers for our services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy (b) Consent
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity,(b) Contact,(c) Technical,(d) Usage, (e) Profile	(a)Necessary for our legitimate interests to develop our services and grow our business (b) Consent

We will use your data for the purpose it was collected and where we have your consent or an appropriate lawful basis may use your personal information to provide you with marketing information about services, promotions and offers that may be of interest to you. This document explains how you can change whether to receive this information. Please note that, even if you choose not to receive this information, we may still use your personal information to provide you with important services communications, including communications in relation to any services we provide to you.

You will only receive marketing communications from us if you have:

• Requested information from us

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- If you provided us with your details and ticked the box at the point of entry of your details for us to send you marketing communications
- You have not opted out of receiving marketing
- Where we have an appropriate lawful basis

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

How to change your preferences

We operate in line with the GDPR data protection guidelines. We respect your rights and will respond to any request for access to personal information and requests to delete, rectify, transfer, data and to stop processing. We will also advise you on how to complain to the relevant authorities. Where possible any requests or objections should be made in writing to the Data Controller, or you can visit our website, call, or email us to contact us to exercise your rights, make a complaint, or change your preferences at any time.

Opting out at a later date

Where you give your consent for us to process your data, for example when you agree to us sending you marketing information or where you agree to us processing financial data, you can contact us to amend or withdraw your consent at any time. You can also choose to object to processing and request deletion of your data. We respect all user rights as defined in GDPR. If you have any comments or wish to complain please contact us.

How we store and process your data

Your data will be collected, stored and processed securely, where we transfer your data internationally, we will ensure we take appropriate precautions to protect this data. Your data will be stored only for as long as strictly necessary to ensure we have records of services and other interactions. For more information, please contact us about our Data Retention Policy.

We will only use your personal 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 find out more about how the processing for the new purpose is compatible with the original purpose, please email us. If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

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We may be legally obliged to disclose your personal information without your knowledge to the extent that we are required to do so by law; in connection with any ongoing or prospective legal proceedings; in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk); to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

Our obligations

We are a Data Controller. In relation to the information that you provide to us, we are legally responsible for how that information is handled. We will comply with the GDPR in the way we use and share your personal data.

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You will not have to pay a fee to access your personal 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 may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal 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.

We aim to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of

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requests. In this case, we will notify you and keep you updated.

Third Parties

We may have to share your personal data with selected third parties in order to meet our obligations to you and for the purposes described in this document:

- Service providers who provide IT and system administration services.
- Third parties including data processors, suppliers, service providers, equipment providers, and other third parties as required to run and grow our business
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, credit scoring, banking, legal, fraud protection, insurance and accounting services.
- Other technology companies providing tracking, analytics, and advertising companies
- Social media companies
- Companies in our Group of companies
- Partners and other organisations involved in the provision of our services to you and as required to operate our company
- Government organisation, regulators, other legal authorities and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.
- Other companies as required to meet our obligations to you and run our business

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

Security

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 those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

Where required under GDPR will report any breaches or potential breaches to the appropriate authorities within 24 hours and to anyone affected by a breach within 72 hours. If you have any queries or concerns about your data usage, please contact us.

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Our 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 notice of every website you visit.

Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

As well as your ability to accept or reject cookies, we also require your permission to store cookies on your machine, which is why when you visit our site, you are presented with the ability to accept our terms of use, including the storage of cookies on your machine.

Contacting us, exercising your information rights and Complaints

If you have any questions or comments about this Privacy Policy, wish to exercise your information rights in connection with the personal data you have shared with us or wish to complain, please contact: Charlotte Stavrou at charlotte@sevensixagency.com. We aim to process data protection requests within 30 days, SAR responses are usually free, but we reserve the right to charge for excessive or unfounded requests. We fully comply with Data Protection legislation and will assist in any investigation or request made by the appropriate authorities.

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If you remain dissatisfied, then you ha authority. You can find the list at:		
https://ec.europa.eu/justice/article-29	9/structure/data-protect	ion-authorities/index_en.htm
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