



Privacy Policy

Privacy Statement Summary:

This Privacy Policy ("Policy") explains how your information is collected, used and disclosed by Trunk ("We" or "Us" or "our"). This policy applies where we are acting as a Data Controller with respect to the personal data of our website visitors and service user, in other words, where we determine the purposes and means of the processing of that personal data.

We are committed to safeguarding the privacy of our website visitors and service users. We will never sell, share, or use your personal information other than as described here.

By using our website and agreeing to this Policy, you consent to our use of cookies in accordance with the terms of this Policy.

Who will use my data?	Trunk
What for?	We will store and process your data in order to allow us to provide our products and services. This includes the following services: - Brand strategy; - Creatives; - Web Design UX and app; - SEO; - PPC; - Social Media; - PR; - Content Production If you contact us, we may also send you information that we think you will be interested in. This may include a range of related products and services. We will also send any relevant details to authorities such as HMRC and any other organisation that requires them by law.
What will happen if I contact you?	If you contact us, we will use your data to send you the information that you have requested and updates, and other information that we think you will be interested in. We will also use your information to process a GDPR request

What data will be stored?	As an individual, client, or employee, we will store only the personal details required to run our business, respond to you, or meet our contractual and legal obligations.
What data will be shared?	We will only share data where strictly necessary to meet our obligations in order to provide the services that we offer. We will not share your data with any third parties other than as required to fulfil our contracts and as described here. We may share your information with regulators or legal bodies that request it. We will only share any data that is particularly relevant to our process in order to provide the services that we offer. We will never sell your personal data to other companies / third-parties.
How long?	Your data will be stored for up to 7 years following the last contact we have with you, after which time your data will be deleted. For more information please refer to 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. Access to your data is strictly controlled. For more information refer to our Information Security policy.
How is my data kept secure?	We will store your data on secure UK based servers which will be processed in the UK. We have completed a risk assessment of these storage facilities and are confident that they meet GDPR requirements. We use industry standard security protocols/technology to secure your data.

We take your privacy seriously and will only use your personal information to provide the services you have requested from us and to send you information about services you may be interested in. We will never sell, share or use your personal information other than as described here.

About This Privacy Policy

This policy sets out how we will use and share the information that you give us. This policy describes your relationship with Trunk.

The General Data Protection Regulation (GDPR) describes how organisations must collect, handle, process, and store personal information.

These rules apply regardless of whether data 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.

Who We Are And How To Contact Us

Trunk is registered in United Kingdom and is registered with the Information Commissioner's Office. The Data Protection contacts are the Operations Team at Trunk. You can contact us in any of the following ways:

Email: hello@trunk.agency

Phone: +44 (0)161 7111 1000

Address: 6th Floor, Manchester House, 86 Princess Street, Manchester, M1 6NG

OUR ARTICLE 27 REPRESENTATIVE

Our EU Representative

Under Article 27 of the GDPR, we have appointed an EU Representative to act as our data protection agent. Our nominated EU Representative is: Instant EU GDPR Representative Ltd.

Adam Brogden contact@gdprlocal.com
Tel +35315549700
INSTANT EU GDPR REPRESENTATIVE LTD
Office 2,
12A Lower Main Street, Lucan Co. Dublin
K78 X5P8
Ireland

Who this privacy policy applies to

This policy relates to data subjects of Trunk including clients, customers, employees, and all other individuals. Processing of your data is required in order to offer you our products and services. This policy applies to individuals who have shared their data with Trunk as either a customer, client, employee, supplier or in any other capacity.

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
- And other information as required

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

- Information that is given and stored as part of our ongoing relationship

We do not collect or process sensitive data about you.

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
To process and deliver the products and services you request including all our services mentioned above.	(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 owed to us (b) Consent
To manage our ongoing relationship with you which will include notifying you about changes to our terms, services or privacy policy, to maintain our records	(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, (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	(a) Technical, (b)	(a) Necessary for our legitimate

improve our website, services, marketing, customer relationships and experiences	Usage	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 may collect and process information about you, including your name, date of birth, address, contact details (including email address and mobile phone number), service details, purchase history and data collected as part of any finance application or payment (including previous addresses, employment details and bank account details). We may take personal information from:

- Information that you provide to us when visiting our website or using the contact mechanisms (including your email address, phone number, chat services, post etc...)
- Information that you provide to us when signing up to any distribution lists to receive correspondence from us
- Information relating to any services we provide you including any other transaction details made (including your address, telephone number and payment details)

We may also 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.

How to change your preferences

We operate in line with EU 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, namely the Information Commissioner's Office [for UK companies]. 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 change your

preferences at any time.

Scope of Agreement

By submitting your personal data on this site or as required for us to provide services to you, you are affirming your agreement for such information to be used in accordance with this privacy policy. You will be able to change your preferences at any time by the methods described as prescribed in this document.

We may from time to time use your information for marketing, account management or relationship management purposes. The main purpose of this is to provide you with information about services which we think may be of interest to you and/or to maintain any existing relationship we may have with you.

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 primarily in the UK, where we transfer your data outside the UK, we will ensure we take appropriate precautions to protect this data. Your data will normally be stored for up to 7 years to ensure we have records of service and other interactions. For more information about the storage of your data you can refer to 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.

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.

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

- Requested information from us
- 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

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes. Please refer to our Privacy Policy links.

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

Third Parties

We may have to share your personal data with the parties set out below for the purposes described in this document:

- Service providers who provide IT and system administration services.
- Third parties including equipment providers, and other third parties as required to run our business
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, credit scoring, banking, legal, fraud protection, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom 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 part of our on-going 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.

We 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.

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 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. Should you not accept, then you are free to leave our website, at any time.

Legitimate Interests

Under the GDPR, we are also permitted to share some information with third parties who use such data for non-marketing purposes (including credit and risk assessment and management, identification and fraud prevention, debt collection and returning assets to you).

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: HR/Operations Team at Trunk. We will 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.

If you remain dissatisfied, then you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
www.ico.org.uk

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