

Geist*Studio takes your privacy seriously. Please read the following to learn more about our Privacy Policy.

Geist*Studio understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, geist.studio (“Our Website”), and our customers, employees, freelancers, suppliers and job applicants. We will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

We ask that you please read this Privacy Policy carefully and ensure that you understand it.

Information about us

Geist*Studio is a limited company registered in England and Wales under company number 09089498. Registered address 22 Charles Darwin House, 17 Minnie Baldock Street, London, England, E16 1YE.

What does this policy cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

Our Website may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

What is personal data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.



What are my rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the contact details at the end of this policy.
- The right to access the personal data we hold about you. The 'How Can I Access My Personal Data?' section will tell you how to do this.
- The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the contact details at the end of this policy.
- The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the contact details at the end of this policy to find out more.
- The right to restrict (i.e. prevent) the processing of your personal data.
- The right to object to us using your personal data for a particular purpose or purposes.
- The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the contact details at the end of this policy.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the contact details at the end of this policy.



What data do you collect and how?

Depending upon your interaction us, we may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. We do not collect any personal data relating to children.

Data Collected

How We Collect the Data

Job Applicant Data: contact details, employment history, education and job history, interview notes.

When you apply for a vacancy via a job search or recruitment website.

Employee Data: application details, right to work in UK, contract, health check questionnaire, performance reviews, grievances, disciplinary information (if applicable), PAYE, salary and bonus (if applicable), maternity leave, sick leave and annual leave.

As part of the application process and then throughout your employment with us.

Business Development Data: business cards, contact details and company details and relevant potential project notes.

When you make an enquiry via social media or the contact form on our website; you attend a network event where we exchange business cards; or your details are shared with us by a third-party as part of a referral.

Client Data: contact information (business email address, telephone number), company address, invoice details, purchase history, account details for third party websites relevant to the project i.e. website logins, hosting and domain registration accounts, social media accounts etc.

When you or your company engage our services.

Client Customer Data: contact information (email address, name, telephone number).

When you correspond with us by phone, email, other electronic means, in writing, or when you provide information directly to us, including in conversation with a member of our team.

Supplier Data: contact information (incl. business email address) order details, and bank details.

When you or your company offer to provide, or provides, services to us.

Technical data: includes Google Analytics, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

When you or your company access and use Our Website.



How do you use my personal data?

Under the Data Protection Legislation, we must always have a lawful basis for using your personal data. The following table describes how we will use your personal data, and our lawful bases for doing so:

How Do We Use Your Data	Lawful Basis
<ul style="list-style-type: none">• To register you as a client with us;• To provide our digital marketing services to you, as agreed by you or your organisation;• To process payments, billing and collection; and• To process applications for employment.	To fulfil a contract, or take steps linked to a contract, with you or your organisation.
<ul style="list-style-type: none">• To facilitate effective personal contact;• For handling administration related to our digital marketing services.• To ensure optimum delivery of our services.• To gather information required to administer and follow-up with prospective clients.• To analyse and improve our services and communications and to monitor compliance with our policies and standards;• To manage access to our premises and for security purposes.	As required by us to conduct our business and pursue our legitimate interests.
<ul style="list-style-type: none">• Maintaining employee and accounting records, compliance checks.	For purposes required by law.
<ul style="list-style-type: none">• To communicate with you to keep you up-to-date on the latest developments, announcements, and other information about our services (including newsletters and other information), events and initiatives; to send you details promotional activities.	Consent.



With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone, text message or post with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details at the end of this privacy notice.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

How long will you keep my personal data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Data Collected	How Long We Keep It
<p>Job Applicant Information: contact details, employment history, education and job history, interview notes.</p>	<p>Minimum 6-months after recruitment campaign. Maximum 12-months, unless consent given to retain on file.</p>
<p>Employee Information: application details, right to work in UK, contract, health check questionnaire, performance reviews, grievances, disciplinary information (if applicable), PAYE, salary and bonus (if applicable), maternity leave, sick leave and annual leave.</p>	<p>Employee file: 6 years after end of employee contract/termination date.</p> <p>Right to work: 3 years from employment ceasing.</p> <p>PAYE records: 6 years.</p>
<p>Business Development Information: business cards, contact details and company details and relevant potential project notes.</p>	<p>2 years after last contact.</p>



Data Collected

How Long We Keep It

Client Information: contact information (business email address, telephone number), company address, invoice details, purchase history, account details for third party websites relevant to the project i.e. website logins, hosting and domain registration accounts, social media accounts etc.

Financial records: 6 years after the end of the financial year.

Client contact: duration of client engagement, then 6 years.

Client customer data: duration of project and up until termination of contract.

Client Customer Data: contact information (email address, name, telephone number).

Supplier Information: contact information (incl. business email address) order details, and bank details.

2 years after last purchase order.

Financial records: 6 years after the end of the financial year.

Technical information including: Includes Google Analytics Client ID, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

Please see 'How do you use Cookies?' section.

How do you use cookies?

Our Website may place and access certain first-party cookies on your computer or device. First-party cookies are those placed directly by us and are used only by us. We use cookies to facilitate and improve your experience of Our Website and to provide and improve our products and services. By using Our Website, you may also receive certain third-party cookies on your computer or device. Third-party cookies are those placed by websites, services, and/or parties other than us. Third-party cookies are used on Our Website. In addition, Our Website uses analytics services provided by Google, which also use cookies. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling us to better understand how people use Our Website. For more details, please refer to our Cookie Policy.



How and where do you store or transfer my personal data?

We may store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the “EEA” consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as “third countries” and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

We share your data with external third parties, as detailed in the table below, that are based outside of the EEA. The following safeguards are applied to such transfers:

- We will only transfer your personal data to third countries whose levels of data protection are deemed ‘adequate’ by the European Commission. More information is available from the [European Commission](#).
- We use specific contracts with external third parties that are approved by the European Commission for the transfer of personal data to third countries. These contracts require the same levels of personal data protection that would apply under the Data Protection Legislation. More information is available from the [European Commission](#).
- Where we transfer your data to a third party based in the US, the data may be protected if they are part of the EU-US Privacy Shield. This requires that third party to provide data protection to standards similar to those in Europe. More information is available from the [European Commission](#).

Please contact us using the details below for further information about the particular data protection mechanisms used by when transferring your personal data to a third country.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, associates, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner’s Office where we are legally required to do so.



Do you share my personal data?

We may sometimes contract with the following third parties to supply certain products and services. These are detailed in the table below:

Recipient	Activity Carried Out	Sector	Location
Accountants	Annual financial accounts, quarterly VAT return and payroll.	Financial	UK
Accounting Software	Provision of accounting software.	Information Technology	USA
Backup and Storage	Provision of cloud storage and online backup.	Information Technology	UK
Communication Tools	Business communication platform.	Information Technology	USA
Marketing Automation Tools	Provision of marketing automation tools used to communicate with client's customers.	Information Technology	USA
Website Hosting	Website hosting, design and support.	Information Technology	USA

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.



How can I access my personal data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests can be made in writing either via email or postal addresses shown in below, or verbally, either in person or on the phone.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

How do I contact you?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details for the attention of GDPR Lead:

Email address: hello@geist.studio

Changes to this privacy notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection. Any changes will be made available via email. This Privacy Notice was last updated on 1st June 2020.

