

DATA PROTECTION GENERAL STATEMENT:

This Data Protection Statement outlines Snap Creative Limited (t/a Snap Design & Digital) commitment to its clients, suppliers and other individuals to operate its business activities in a manner which meets the compliance obligations of the Jersey data protection legislation, the Data Protection (Jersey) 2018 Law (“DPJL”) and the General Data Protection Regulation (EU) 2016/679.

Snap Design & Digital understands and respects your right to privacy and we are committed to ensuring the confidentiality and security of your personal data and the personal data processing activities within our organisation by applying the appropriate technical and organisational measures required to achieve this objective.

This document covers the policies and procedures for processing personal data in a compliant manner and outlines the rights of the data subjects in respect of that data. The Privacy Notice below explains how we may use, process and store your personal data.

DATA CONTROLLER, DATA PROCESSOR

Snap Creative Limited trading name is Snap Design & Digital, and our business offices are located at 18-20 Dumaresq Street, St. Helier, Jersey, JE2 3RL. The company website is <https://snap.je>. Snap Design & Digital provides professional services ranging from branding, design and marketing services, website creation, video, and technology hosting services for our clients.

Depending on the services provided to our clients, Snap Design & Digital can act as a data controller and data processor in the provision of its services. Where Snap Design & Digital provides routine prescribed services to its clients, which are detailed in a data processor agreement or equivalent contract, then we act as data processor. Examples of such services are the provision of website hosting services, running, and managing marketing campaigns and competitions for clients. For all other circumstances, we act as Data Controller.

We are registered as a data controller, and data processor, under the Data Protection (Jersey) Law 2018. Our registration number is 67777.

All personal data processed by us will be done so in accordance with this privacy policy and the Jersey data protection law.

If you have any questions in relation to this policy, data protection or information security please contact our data protection manager at dpo@snap.je

Reference documents:

- Data Protection (Jersey) Law 2018
- Data Protection (Registration and Charges) (Jersey) Regulations 2018
- EU General Data Protection Regulation 2016/679

PRIVACY POLICY

SCOPE OF APPLICATION:

This policy applies to our business activities operating within Jersey, Channel Islands, or the personal data processing of the data subjects within the European Economic Area (EEA) and UK.

WHAT DATA WE COLLECT

The personal information we hold includes:

- a) Contact details: e.g. name, home address, business address, telephone number, email address
- b) Social media details: Facebook, LinkedIn, Twitter, Instagram, YouTube, Vimeo, TikTok
- c) Banking details: bank account number and sort code
- d) Personal photograph and video: with your consent for use in promoting our client project work
- e) IP address and computer device information: for monitoring and managing our security policies

WHAT PURPOSES WE USE YOUR PERSONAL DATA

The information provided will be used to:

Purpose of processing	Lawful basis for processing
To provide the contracted professional services to you	Performance of a contract basis is used by us to deliver to you the products and services you have requested of us.
To promote and advertise our products and services using social media, our corporate website, newspapers and other publications and other media channels	Legitimate interest basis is used by us to improve and promote our business, our products and services to clients and interest parties. You have the right to object to such processing by contacting one of our company directors or data protection manager.

<p>To send you notifications, direct marketing information and other information, to keep you informed for our products and services.</p>	<p>Consent basis is used for these activities. You can opt-in and opt-out of such services at any time. To opt-out, just unsubscribe from the newsletter or notification or emails, where the unsubscribe link will be clearly presented in the information sent to you.</p>
<p>To deal with client feedback or complaint in relation to our services.</p>	<p>Performance of a contract basis is used by us to reply and resolve such complaints where a contract exists between us.</p> <p>Otherwise, Legitimate interest basis is used by us to reply and deal with feedback and complaints.</p> <p>You have the right to object to such processing by contacting one of our company directors or data protection manager.</p>
<p>To build and maintain client relationships.</p>	<p>Legitimate interest basis is used by us to meet and recruit new clients, and to build and maintain business relationships.</p> <p>You have the right to object to such processing by contacting one of our company directors or data protection manager.</p>
<p>To meet our contractual obligations to our suppliers.</p>	<p>Performance of a contract basis is used by us to manage, co-ordinate our work with our suppliers and to meet payment terms.</p>
<p>Comply with legal, tax and regulatory obligations.</p>	<p>Such personal data processing will be done in compliance with the relevant law(s) and the legal basis will be Legal Obligation.</p>
<p>Managing security and access to our company's (and clients' where appropriate) computer systems, premises, platforms, websites, and applications</p>	<p>Legitimate interest basis is used by us to ensure the security and safety of our staff, computer systems and business assets.</p> <p>You have the right to object to such processing by contacting one of our company directors or data protection manager.</p>
<p>Provision of a safe and secure environment for employees and business assets in compliance with the required Health & Safety standards and polices.</p>	<p>Legitimate interest basis is used by us to ensure the security and safety of our staff, computer systems and business assets.</p>

	You have the right to object to such processing by contacting one of our company directors or data protection manager.
Obtaining and maintaining insurance cover, managing risks, or obtaining professional advice.	<p>Legitimate interest basis is used by us to ensure that we have the required level of insurance in place for its business.</p> <p>You have the right to object to such processing by contacting one of our company directors or data protection manager.</p>
Establish and exercise our rights in defence of a legal claim.	<p>Legitimate interest basis is used by us to initiate or defend ourselves regarding any legal claim.</p> <p>You have the right to object to such processing by contacting one of our company directors or data protection manager.</p>

HOW WE COLLECT YOUR DATA

We collect personal data in the following ways;

- when you complete and submit the contact form on our company's website
- when you contact us by telephone and leave a voicemail message or send us emails or text messages or contacting us through our website or social media accounts
- when viewing and using our website <https://snap.ie/>, where the data collected relates to the type of device being used, any cookie data and Google Analytics website usage data.
- from third party channels such as public registers, social media, and any other public open forums
- directly from you as a member of the public, prospective employee, existing employee when engaging directly with us.
- from use of website cookies and beacons which may track your usage of our website and uploading of information to the website
- from Google Analytics or other similar software to assist us in managing our website performance, and if required for our clients' website. Only information such as IP address, location, time zone, browser type/version, with plug-in types/versions, device operating system and platform are referenced

The personal information collected from you will only be used in accordance with this privacy policy.

INFORMATION COLLECTED

The information collected will only be used by us for the provision of the services you have requested of us, or where we have your required consent to use your personal data for a specific activity or activities, or where we have a legitimate interest to use such information for our business as outlined in the privacy policy.

The personal data collected is used to

- meet our obligations in the performance of a contract for the provision of our professional services which you have requested of us
- to manage your account with us, and deal with any feedback or complaint
- keep you informed of our products and services which may be of interest to you
- assist us in the delivery and operation of secure business communications via email and our website and other relevant means
- meet legal obligations from relevant local laws in relation to sale of product and services transactions e.g. GST/VAT
- meet any legal obligations in relation to the defence of a legal claim or where we received a court order for the disclosure of personal data
- meet any other legal obligations from relevant local laws
- assist you in case of an emergency situation e.g. if there was an accident on our premises

SOFTWARE APPLICATIONS USED

Listed below are some of the main software applications we use to deliver our professional services for our clients' projects. Each application has a specific function and purpose for processing data to deliver the required services.

Purpose	Software	Personal Data
Advertising	Google Ads, YouTube Ads, Facebook ads, Sendible, UpViral, Instagram, LinkedIn, Hubspot	Personal data: Trackers; Usage Data; Name; Email address
Analytics	Google Analytics, Google Optimize, Facebook Ads conversion tracking (Facebook pixel), Meta Events Manager, LinkedIn Insight	Personal data: Cookies; Usage Data; Trackers; Usage data
Contacting the User	Mailing list or newsletter and Contact Form	Personal data: Email address

Displaying content from external platforms	Google fonts, Vimeo, YouTube	Personal data: Trackers; Usage data
Hosting and backend infrastructure	Digital Ocean, WP Engine	Personal data: Various types of data as specified in the privacy policy of the service
Infrastructure monitoring	Digital Ocean, WP Engine	Personal data: Cookies; Usage data
Managing contacts and sending messages	Mailgun, MailChimp, Hubspot	Personal data: Email address
Remarketing and behavioural targeting	Facebook Remarketing LinkedIn Insight Google Ads Hotjar	Personal data: Cookies; Trackers; Usage data
Tag management	Google Tag Manager	Personal data: Trackers; Usage data
Traffic optimisation and distribution	Cloudflare	Personal data: Trackers
User database management	HubSpot CRM HubSpot Lead Management	Personal data: Email address, first name, last name, Trackers, Usage data, various types of data as specified in the privacy policy of the service

INFORMATION ON OPTIONG OUT OF INTEREST-BASED ADVERTISING

In addition to any opt-out feature provided by any of the services listed in this document, Users may follow the instructions provided by YourOnlineChoices (EU), the Network Advertising Initiative (US) and the Digital Advertising Alliance (US), DAAC (Canada), DDAI (Japan) or other similar initiatives.

Such initiatives allow Users to select their tracking preferences for most of the advertising tools. The Owner thus recommends that Users make use of these resources in addition to the information provided in this document.

The Digital Advertising Alliance offers an application called AppChoices that helps Users to control interest-based advertising on mobile apps.

Users may also opt-out of certain advertising features through applicable device settings, such as the device advertising settings for mobile phones or ads settings in general.

RECIPIENTS OF DATA

Personal data collected may be disclosed or transferred to;

- Snap Design & Digital data processors who provide those requested services in relation to the provision of our branding, design and marketing services, website creation, video creation and technology hosting services for our clients
- Snap Design & Digital data processors who provide services in relation to the secure and safe running of its business systems and processes
- Professional agents in the provision of required services (e.g. lawyers, bankers, accountants, auditors)
- Law Enforcement and Competent Authorities as required by law where such disclosure is necessary for compliance with a legal obligation
- Other third parties if requested by you and when relevant consent has been obtained from you
- Any new owner of Snap Design & Digital should it be acquired or merged with another company

Third party service providers are bound by the requirements of the Data Processor Agreement obligations, where personal data is to be processed to high standards of confidentiality and in line with the required security arrangements.

SOCIAL MEDIA PLATFORM

When we use social media platforms e.g. Facebook, Instagram, LinkedIn, we only operate it so as to promote our own business and we would not knowingly engage in activities that go beyond this scope. Our clients (and other data subjects) are advised to refer to the respective privacy notices of these social media platforms to check your data protection and privacy rights. Snap Design & Digital cannot be held responsible for third party social media platforms or websites activities.

Snap Design & Digital own social media accounts are identified as being the following;

Facebook <https://www.facebook.com/snapjersey/>
Instagram https://www.instagram.com/snap_jersey
LinkedIn <https://www.linkedin.com/company/snap-je>

DATA SHARING AND DISCLOSURE

We do not share your data beyond what is agreed as necessary for the provision or operation of our services to you. Any third parties we engage to process your personal information are obliged to respect the confidentiality of your information.

There are circumstances where we might share anonymised data (not identifying you) for research and analytical purposes.

There are legal and regulatory circumstances where we may be obliged to share data, for example with Court, Police or Regulator.

THIRD COUNTRY TRANSFERS AND SAFEGUARDS

We operate in Jersey and our data substantially resides in Jersey. However, we do use technology which may transfer data to another jurisdiction, for example use of Microsoft and Cloud-based back-up of data. Where possible, we would always look to hold your data within Jersey or UK or EEA in the first instance.

For those occasions where your data is to be held outside the Jersey, UK, or EEA, in locations where such transfers do not offer the same level of protection of personal data as may be enjoyed within Jersey (e.g., United States) we will ensure that your data is appropriately protected (for example by reference to IT security standards). We would also look to ensure that the service provider is contracted to adhere to the appropriate security and data protection standards as provided for in the required Standard Contractual Clauses data transfer mechanism.

Where we cannot guarantee these safeguards, we would always request your consent before the data is transferred.

DATA SECURITY

We use up-to-date data storage and security techniques to protect your personal information from unauthorised access, improper use or disclosure, unauthorised modification or unlawful destruction or accidental loss.

We have a Data Protection Policy and Information Security Policy and Training Policy ensuring high standards of governance for your data.

The security measures we have in place include:

1. Policies - All staff adhere to the Acceptable use policy.
2. Training - There is a mandatory Data Protection training for all the new staff and annual updates for existing staff.
3. Physical Security/Access Permissions - There are access controls to all data held which are appropriate to staff requirements. To ensure security in the workplace staff have their own access card for perimeter doors to prevent unauthorised access.
4. Destruction process - All personal data is securely destroyed after it has reached the

retention period. Paper waste is sent to secure disposal in designated confidential waste bins.

5. Encryption - Encrypted email can be used for email data transfer outside of our network.

HOW LONG WE HOLD DATA

We will retain your personal data for as long as necessary to fulfil the purpose for which it was collected.

Snap Design & Digital will retain personal data in relation to clients, suppliers, other data subjects' transactions for 10 years from the date of the transaction where they are deemed to be part of the financial records of the business.

Anything else we delete 1 year after your last interaction with us. So, if we don't hear from you for a year, we delete your data (unless we need to retain it for legal or regulatory reasons).

YOUR RIGHTS

Data subjects have a number of rights available to them;

- access to their personal data,
- rectification of any inaccuracies,
- restriction on the processing their data
- to object to the processing of their data
- to be forgotten (erasure of your data)
- right to data portability
- right to object to automated decision making and profiling
- right to withdraw consent for those data processing activities based on consent

Snap Design & Digital does not make any decisions based on purely automated means, but if we do, you have a right to object.

Each data subject request to exercise the rights noted above will be reviewed against the requirements of the Data Protection (Jersey) Law 2018 and in certain circumstances (e.g. restriction, erasure, objection, data portability) these rights may not be exercisable by the company. Full explanations will be given in such cases.

MAKING A COMPLAINT:

The Office of the Information Commissioner in Jersey, Channel Islands, is an independent statutory authority where you can make a complaint or learn more about data protection in Jersey. Their office is located at 2nd Floor, 5 Castle Street, St. Helier, Jersey, JE2 3BT. Their website is www.jerseyoic.org and telephone number is 01534 716530.

CHANGE TO THIS POLICY:

Snap Design & Digital may update this Privacy Policy at any time. The updated policy notice will appear on our website <https://snap.je/> and in our Terms of Business.

This Privacy Policy was last approved on **09 March 2023**.

CONTACT DETAILS:

If you have any questions, concerns or complaints with respect to this Privacy Notice or the handling of your privacy or personal information, please contact one of our directors or our data protection manager at dpo@snap.je.