

# Privacy Policy

Red Pie Limited (“We”, “Red Pie”, “our” or “us) is committed to protecting your (“you” or “your”) personal data, handling it responsibly and respecting your privacy.

This policy covers the personal data that we collect whenever you interact with us, including when you use our website, when you attend Red Pie events, and when you correspond with us (such as by email or over the phone). It also covers personal data that we may receive from third parties.

## Personal data Red Pie collects from you

We collect personal data from your interactions with us, such as when you engage with our website, attend a Red Pie event, or when you email or phone us.

The personal data we collect from you includes:

- The name and contact details that you provide at the time of making an enquiry
- Your payment and address details
- Your marketing preferences, including any consents you have given us
- Information you provide when you complete surveys that we use for research purposes
- Your browser or device information
- Information about your use of our website
- Your communications with us, including when you report a problem with our site
- Information about your invitations and attendance at Red Pie events.

## Personal data Red Pie receives from third parties

Sometimes we receive personal data from third parties, in particular:

- You may have asked someone to make an enquiry on your behalf
- Software tell us how you engage with our website
- Government and law enforcement authorities may provide us with personal identification and background information when they are involved in official inquiries

## Why Red Pie processes your personal data

This section explains the reasons why we process your personal data and our legal bases for doing so.

### **Consent**

When you contact us to ask us to provide or quote for our services, we need to process your personal data both to provide those services and to contact you.

If you've opted-in to receive information from Red Pie (for example by ticking a box on our website), then we use your information to contact you by email, post or phone.

We also rely on your consent to process information about your use of our websites, so that we can improve your browsing experience and deliver better information to you.

Wherever we rely on your consent to process personal data, you have a right to withdraw that consent.

### **Legitimate interests**

We process your personal data when necessary to pursue our legitimate interests in the following:

- Providing our services to you
- tailoring our website and communications for you.
- monitoring, improving and protecting our content and services
- checking the financial details you provide (to process your payments and prevent fraudulent transactions)
- sending you some types of direct marketing, including by email and post
- responding to your comments or complaints
- undertaking, or inviting you to take part in, market research
- preventing, investigating and/or reporting fraud, terrorism, misrepresentation, security incidents or crime
- managing legal claims, compliance, regulatory and investigative matters
- notifying you about changes to our services

You have a right to object to any processing that we undertake for our legitimate interests.

## **Contract**

We process your personal data when necessary for contractual reasons, such as to administer your account with us and to provide services that you have requested.

## **Legal obligation**

We are legally required to process your personal data in cases where we need to respond to certain requests by government or law enforcement authorities.

## **Who Red Pie shares personal data with**

We will share your personal data with the following recipients:

- commercial partners, so they can advise us how best to communicate with you on their behalf. We do not give your data to partners for them to communicate with you directly.
- third party suppliers involved in: providing services to Red Pie; website hosting; systems maintenance; database management; identity checking; payment processing;
- government authorities to assist with their official requests and comply with our legal obligations
- our advisers, our bankers and any new owners of the business (in the event our business is sold or integrated with another business)

## **Personal data transfers outside of the EEA**

The EEA includes all EU countries, as well as Iceland, Liechtenstein and Norway. Some of the third parties that we share personal data with may need to transfer personal data outside of the EEA, for example to the United States of America.

Where your personal data is transferred to a country outside of the EEA and that country is not subject to an EU adequacy decision, we will ensure your data is protected by appropriate safeguards (for example, EU approved standard contractual clauses, a Privacy Shield certification, or a supplier's Binding Corporate Rules). A copy of the relevant safeguard can be provided for your review on request.

## **How long Red Pie retains personal data and security**

We retain personal data about you for as long as your account remains active, and for at least 6 years after (in case you have any query about our services or the matters where we assisted you), including for our legal and contractual obligations.

We seek to use reasonable organisational and administrative measures to protect personal information within our organisation. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us of the problem by contacting us.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to us by email or to our site; any transmission is at your own risk. Once we have received your information, we will use reasonable procedures and security features to try to prevent unauthorised access.

### **Your rights to withdraw consent and to object (including to direct marketing)**

Wherever we rely on your consent to process personal data, you always have a **right to withdraw** that consent.

You also have the **right to object** to any use of your personal data for direct marketing purposes, as well as to processing that we undertake based on our legitimate interests.

### **Your other personal data rights**

In addition to your rights to withdraw your consent and to object, you have the right to ask us:

- for **access** to information about your personal data or for a copy of your personal data
- to **correct** or **delete** your personal data
- to **restrict** (i.e. stop any active) processing of your personal data
- to provide you with certain personal data in a **structured, machine readable format** and to transmit that data to another organisation

These **rights may not always apply**, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have a compelling legitimate interest in

keeping. If this is the case then we'll let you know when we respond to your request.

### How to contact us and exercise your rights

The easiest way to stop receiving information from us is by emailing us to ask us to stop. You can also correct your details at any time by emailing us with your updated details.

We will do our best to assist with any queries you have about your personal data. You can contact us at any time using the contact details below. When you do so, please provide your full name, your preferred contact information, and a summary of your query.

Peter Moody  
Principal  
18 Great Jubilee Wharf  
78 Wapping Wall  
London E1W 3TH

[peter.moody@redpie.co.uk](mailto:peter.moody@redpie.co.uk)

If you consider our use of your personal information to be unlawful, you have the right to complain to an EU data protection authority where you live, work or where you believe a breach may have occurred. This is likely to be the Information Commissioner's Office in the UK (please see further information on their website: [www.ico.org.uk](http://www.ico.org.uk)).

The information set out in this policy is provided to individuals whose personal data we process as data controller, in compliance with our obligations under Articles 13 and 14 of the General Data Protection Regulation 2016/679.

**Last updated 24 May 2018**

We suggest that you check back here for updates, as we will update this policy from time to time.