

# PRIVACY POLICY

## INTRODUCTION

Welcome to Whippet's privacy policy.

Whippet respects your privacy and is committed to protecting your personal data. This privacy policy aims to inform you about how Whippet UK Limited (referred to as "**Whippet**", "**we**", "**us**" or "**our**" in this privacy policy) looks after your personal data (collected offline as well as online through our website, [www.whippet.co.uk](http://www.whippet.co.uk)) and tells you about your privacy rights and how the law protects you.

We are the controller responsible for personal data we collect about you.

If you have any questions about this privacy policy, including any requests to exercise your legal rights [\[link\]](#), please contact us [hello@whippet.co.uk](mailto:hello@whippet.co.uk).

This privacy policy is provided in a layered format, so you can click through to the specific areas set out below. Please also use the Glossary [\[link\]](#) to understand the meaning of some of the terms used in this privacy policy.

1. **[THE PERSONAL DATA WE COLLECT ABOUT YOU \[LINK\]](#)**
2. **[HOW IS YOUR PERSONAL DATA COLLECTED \[LINK\]](#)**
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## 1. THE PERSONAL DATA WE COLLECT ABOUT YOU

We may collect different kinds of personal data about you which we have categorised as follows:

- **Identity and Contact Data** includes title, name, job title/function, the organisation you work for or are engaged by, email address, social media account, telephone numbers, addresses, passport number.
- **Business Information Data** includes information about you or your work that we obtain or generate in the course of the client relationship between you or your organisation and Whippet.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

If you are visiting our website, we may also collect the following:

- **Profile and Usage Data** includes the services you viewed or searched for, page response, times, download errors, length of visits and page interaction information (such as scrolling, clicks and mouse-overs), purchase or orders made by you and any feedback you provide.
- **Technical Data** includes information collected during your visits to our website, such as internet protocol (IP) address, 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 our website.

If you are an individual client or you are an individual engaged by us to provide goods or services, we will also collect the following:

- **Payment Information Data** includes details of payments made in settlement of our invoices as well as bank account details to pay your invoices and your VAT number (where applicable).

If you are enquiring about, or applying for, a job with us we may also collect the following:

- **Recruitment Data** includes similar types of information included with Identity and Contact Data, interview notes, references, together with details that you might typically find on a CV, such as employment history, educational or professional background.

We do not intentionally collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. Please avoid providing any such information to us.

## 2. HOW IS YOUR PERSONAL DATA COLLECTED?

We may collect your personal data **directly** - for example, where you or your organisation is our client or a prospective client or supplier or prospective supplier to us, you communicate with us, you visit us or our website or attend our events.

We may also collect your personal data **indirectly**. This could happen where your personal data have been provided:

- by one of our members of staff;
- by someone else from your organisation;
- by someone else from another organisation with whom your organisation is dealing;
- by someone who has referred or recommended us to you;
- by someone involved in recruitment;
- by anyone else who decides to provide us with your details.

We may also obtain your personal data indirectly by sourcing information available online, such as Identity and Contact Data published on networking platforms or your organisation's website in connection with our business development and marketing activities.

We may also generate personal data about you, for example by creating records of contact between us and you in the course of the client relationship between you or your organisation and Whippet, which would form part of the Business Information Data relating to you.

## 3. HOW WE USE YOUR PERSONAL DATA

The table below summarises the purposes for which we process your personal data (and which types) and the legal basis we rely on to carry out that processing lawfully:

Purpose	Types of Personal Data	Legal Basis
Setting you or your organisation up as our client	Identity and Contact <a href="#">[Link]</a>	Our legitimate interest <a href="#">[link]</a> (the efficient administration of our creative agency services) Performance of a contract (where our client is an individual)
Providing and administering creative agency services on behalf of our clients	Identity and Contact <a href="#">[Link]</a> Business Information <a href="#">[Link]</a>	Our legitimate Interest <a href="#">[Link]</a>

		(performing our business) Performance of a contract (where our client is an individual)
Client relationship management, including dealing with complaints	Identity and Contact <a href="#">[Link]</a> Business Information <a href="#">[Link]</a>	Our legitimate interest <a href="#">[Link]</a> (providing a good quality service to clients)
Business development and marketing	Identity and Contact <a href="#">[Link]</a> Profile and Usage <a href="#">[Link]</a> Technical <a href="#">[Link]</a>	Our legitimate interest <a href="#">[Link]</a> (marketing and promoting our business)
Communicating with you – this might be: <ul style="list-style-type: none"> <li>• in response to an enquiry online, through our website or social media, or offline</li> <li>• providing you with our marketing communications from time to time, such as updates on creative agency news or about us (you can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us <a href="#">[Link]</a> at any time).</li> </ul>	Identity and Contact <a href="#">[Link]</a> Marketing and Communications <a href="#">[Link]</a>	Our legitimate interest <a href="#">[Link]</a> (providing a responsive service (where you have made an enquiry) or marketing and promoting our business)
Dealing with job applications and recruitment generally	Identity and Contact <a href="#">[Link]</a> Recruitment <a href="#">[Link]</a>	Our legitimate interest <a href="#">[Link]</a> (recruitment of staff for our business) Performance of a contract <a href="#">[Link]</a> (where we employ/engage you)
Monitoring our service levels and ensuring quality control	Identity and Contact <a href="#">[Link]</a> Business Information <a href="#">[Link]</a> Technical <a href="#">[Link]</a> Profile and Usage <a href="#">[Link]</a>	Our legitimate interest <a href="#">[Link]</a> (providing a good quality service to clients)
Ensuring the security of our physical premises and our IT systems together with ensuring your safety whilst on our premises or at an event we have organised	Identity and Contact <a href="#">[Link]</a> Technical <a href="#">[Link]</a>	Our legitimate interest <a href="#">[Link]</a> (keeping our premises and infrastructure secure and ensuring your safety)
Dealing with our insurers, for example where you or your organisation has a claim against us	Identity and Contact <a href="#">[Link]</a> Business Information <a href="#">[Link]</a>	Our legitimate interest <a href="#">[Link]</a> (risk management)
Enforcing any legal claims against you or your organisation, for example for unpaid invoices or defending ourselves against any claims from you or your	Identity and Contact <a href="#">[Link]</a> Business Information <a href="#">[Link]</a> Payment Information <a href="#">[Link]</a> Recruitment <a href="#">[Link]</a>	Our legitimate interest <a href="#">[Link]</a> (establishing, enforcing or

organisation (including defending any pre-employment claims)		defending a legal claim)
Where we have engaged you to provide services to us, receiving the proper benefit of any of those services and administering that engagement	Identity and Contact <a href="#">[Link]</a> Business Information <a href="#">[Link]</a> Payment Information <a href="#">[Link]</a>	Our legitimate interest <a href="#">[Link]</a> (utilising services we require for our business) Performance of a contract <a href="#">[Link]</a> where the service provider is an individual (for example, meeting our payment obligations)
Other purposes required by law	Any of the information in Paragraph 1	Legal obligation <a href="#">[Link]</a> (complying with our statutory or regulatory obligations)
Other purposes described at the point of personal data collection	As described at point of collection	As described at point of collection

### Change of purpose

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. In these circumstances, if you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us [\[Link\]](#).

## 4. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the following categories of recipients:

- Our professional advisers such as lawyers, accountants, consultants and marketing specialists.
- Government or regulatory authorities.
- Relevant insurers.
- Organisations to whom we outsource certain services including office management systems, data hosting, website management, email marketing, confidential waste disposal, IT systems or software providers, IT support service providers and document and information storage providers.
- Organisations or individuals engaged by us in the course of the providing our services such as individual consultants (or their personal service companies) or other specialist companies.
- Organisations with whom you or your organisation is dealing and their professional advisors.
- Service providers to assist us with client insight analytics, such as Google Analytics.
- Postal or courier providers who assist us in delivering our postal marketing campaigns to you, or delivering documents related to a project.
- Prospective buyer if we propose to sell or sell any business or assets.
- Referees where dealing with job applications.

We will share your personal data with such recipients only as necessary for the purposes set out in Section 3 [\[Link\]](#) and then only to the extent reasonably necessary for the purpose for which we are engaging, communicating or dealing with them.

Where organisations in any of the above categories of recipients are providing us with services that involve them processing personal data on our behalf, they are our data processor. The data processors we currently use include:

- Brand Rocket (networking services)
- Google Mail (provision of email)
- Highrise (CRM database)
- Workflow Max (project management)
- Xero (financial management)
- Campaign monitor (newsletter distribution)
- Core Technical Solutions (IT support services)

We also share some personal data with our Australian group company, Whippet Pty Ltd. Both companies have access to a shared client relationship management database containing Identity and Contact Data, Business Information Data and Marketing and Communications Data. Whippet Pty Ltd only uses such data for the purposes of pursuing good client relationship management practices, such as ensuring that individuals whose details are held in the database do not receive duplicate or unnecessary contacts or communications and are only contacted by Whippet staff responsible for the relevant client relationship.

Please note this list is non-exhaustive and there may be circumstances where we reasonably need to share your personal data with other organisations in order to provide our services as effectively as we can, as described in this privacy policy or as required under applicable law or otherwise with your consent.

## 5. INTERNATIONAL TRANSFERS

Some of our service providers store personal data outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA. Where this is the case, we will ensure that it will only be transferred to countries that have been identified as providing adequate protection for personal data (like New Zealand), or to a third party where we have approved a transfer mechanism in place to protect your personal data – for example, by requiring the service provider to enter into the [European Commission's Standard Contractual Clauses](#), or by ensuring the entity is Privacy Shield certified (for transfers to US-based third parties).

Our Australian group company, Whippet Pty Ltd has access to and processes personal data as described in section 4 above [\[Link\]](#). Whippet Pty Ltd has entered into the [European Commission's controller-to-controller Standard Contractual Clauses](#) with us in relation to this processing.

For further information, please contact us [\[Link\]](#).

In addition to the transfers described above, it may be that in the course of providing our services, it is necessary for us to provide personal data relating to you to organisations which are outside the EEA – for example if a client asks us to conduct a campaign in a non-EEA country or use a particular provider based outside the EEA. We will only do this if and to the extent that it is necessary and where there is an appropriate transfer mechanism in place to protect your personal data.

## 6. DATA SECURITY

We have put in place appropriate technical and organisational security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 7. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, insurance or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Generally, in respect of client information, our retention period is 6 years following the end of the project in question. Further details on this are set out in our client terms of business. Marketing and communications data will generally be held for 2 years following the last active interaction with you.

Details of specific retention periods for different aspects of your personal data are available from us on request [\[Link\]](#).

Upon expiry of the applicable retention period we will securely destroy your personal data in accordance with applicable laws and regulations.

## 8. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- *Request access to your personal data. [\[Link\]](#)*
- *Request correction of your personal data. [\[Link\]](#)*
- *Request erasure of your personal data. [\[Link\]](#)*
- *Object to processing of your personal data. [\[Link\]](#)*
- *Request restriction of processing your personal data. [\[Link\]](#)*
- *Request transfer of your personal data. [\[Link\]](#)*
- *Right to withdraw consent. [\[Link\]](#)*
- *Right to complain to a supervisory authority. [\[Link\]](#)*

If you wish to exercise any of the rights set out above, please *contact us* [\[Link\]](#).

### **No fee usually required**

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.

### **What we may need from you**

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.

## Time limit to respond

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.

## 9. CONTACT DETAILS

Please use the following information if you need to contact us:

**Email address:** hello@whippet.co.uk  
**Our address:** 7 Holyrood Street, London, SE1 2EL

## 10. UPDATES TO THIS PRIVACY POLICY

This version was last updated in July 2018 and historic versions can be obtained by contacting us. We may update this policy from time to time by publishing a new version on our website and, where any changes materially affect you, we will also make reasonable efforts to notify you.

## 11. CHANGES TO YOUR PERSONAL DATA

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us by contacting us [\[LINK\]](#).

## 12. THIRD PARTY SITES

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 or practices. When you move from our website to a third-party website using such links, we encourage you to read the privacy notice of that website.

## 13. GLOSSARY

### LEGAL BASIS

**Legitimate Interest** means the processing of your personal data is necessary for the purposes of a legitimate interest of our business or a third party and that your interests, rights and freedoms do not override that legitimate interest. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for the purposes of our legitimate interests or those of a third party. We do not use your personal data for activities where our interests are overridden by a negative impact on you. We can provide you with further details on why we consider this to be the most appropriate legal basis by contacting us [\[LINK\]](#)

**Legal obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation to which we are subject.

**Performance of a contract** means processing your personal data where it is necessary for the performance of a contract with you, or at your request, take preparatory steps to perform such a contract.

### YOUR LEGAL RIGHTS

You have the right to:

**Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms, although this does not apply where you object to our processing for direct marketing purposes.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party in a structured, commonly used, machine-readable format. Note that this right only applies to personal data that is processed by automated means where we are relying on consent or performance of a contract as the legal basis for the processing.

**Withdraw consent at any time** where we are relying on consent as the legal basis for processing your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

**Complain to Supervisory Authority.** If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement. The relevant supervisory authority in the UK is the Information Commissioner's Office. We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.