PRIVACY POLICY

Last Updated March 07, 2023

This Privacy notice for Constructive Studio ('Company', 'we', 'us', or 'our'), describes how and why we might collect, store, use, and/or share ('process') your information when you use our ('services'), such as when you:

- Visit our website at http://www.constructivestudio.com, or any website of ours which links to our privacy notice.
- Engage with us in any other related ways, including any sales, marketing, or events.

Questions or Concerns? Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at mail@constructivestudio.com.

SUMMARY OF KEY POINTS

This summary provides key points from our privacy notice, but you can find out more details about any of these topics by clicking the link following each key point or by using our table of contents below to find the section you are looking for.

What personal information do we process? When you visit, use, or navigate our Services, we may process personal information depending on how you interact with Constructive Studio and the Services, the choices you make, and the products and features you use.

Do we process any sensitive personal information? We may process sensitive personal information when necessary with your consent or as otherwise permitted by applicable law.

Do we receive any information from third parties? We do not receive any information from third parties.

How do we process your information? We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information or other purposes with your consent. We process your information only when we have a valid legal reason to do so.

In what situations and with which third parties do we share personal information? We may share information in specific situations and with specific third parties.

How do we keep your information safe? We have organisational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet pr information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be bale to defeat our security and improperly collect, assess, steal, or modify your information.

What are your rights? Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information.

How do you exercise your rights? The easiest way to exercise your rights is by filling out our date subject request form available here, or by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

Want to learn more about what constructive studio does with any information we collect? Click here to review the notice in full.

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1. What information do we collect?

Personal information you disclose to us

In Short: We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and Services, the choices make, and the products and features you use. The personal information we collect may include the following:

- Names
- Phone numbers
- Email addresses
- Mailing addresses
- Job titles
- Contact or Authentication data
- Contact preferences
- Geolocation information/IP Addresses
- Internet Activity (e.g. internet browsing history, search history, page views)
- Online identifiers (e.g. IP Address, Cookie Identifiers)

Sensitive information. When necessary, with your consent or as otherwise permitted by applicable law, we process the following categories of sensitive information:

Precise geolocation

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any to such personal information.

Information automatically collected

In Short: Some information – such as your Internet Protocol (IP) Address and/or browser an device characteristics – is collected automatically when you visit our Services.

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

The information we collect includes:

- Log and Usage Data. Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (Sometimes called 'crash dumps'), and hardware settings).
- Device Data. We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services.
 Depending on the device used, this device data may include information

such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.

• Location Data. We collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of the Services.

2. How do we process your information?

In Short: We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- To respond to user inquiries/offer support to users. We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- To send administrative information to you. We may process your information to send you details about our products and services, changes to our terms and policies, and other similar information.
- To request feedback. We may process your information when necessary to request feedback and to contact you about your use of our Services.
- To send you marketing and promotional communications. We may process
 the personal information you send to us for our marketing purposes, if this is in
 accordance with your marketing preferences. You can opt out of our
 marketing emails at any time. For more information, see "What are your
 privacy rights?" below).
- To deliver targeted advertising to you. We may process your information to develop and display personalised content and advertising tailored to your interests, location, and more.
- To protect our Services. We may process your information as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention.

- To identify usage trends. We may process information about how you use our Services to better understand how they are being used so we can improve them.
- To determine the effectiveness of our marketing and promotional campaigns. We may process your information to better understand how to provide marketing and promotional campaigns that are most relevant to you.
- To save or protect an individual's vital interest. We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.
- To provide accurate information. We may process your information to provide accurate information related to your inquiry such as Conservation areas, Listed Buildings and any other factor affecting our Service.

3. What Legal Bases do we rely on to process your information?

In Short: We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e. legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfil our contractual obligations, to protect your rights, or to fulfil our legitimate business interests.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- Consent. We may process your information if you have given us permission (i.e. consent) to use your personal information for a specific purpose. You can withdraw your consent at any time. Click here to learn more.
- Performance of a Contract. We may process your personal information when
 we believe it is necessary to fulfil our contractual obligations to you, including
 providing our Services or at your request prior to entering into a contract with
 you.
- Legitimate Interests. We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms.
 For example, we may process your personal information for some of the purposes described in order to:
 - Send users information about special offers and discounts on our products and services
 - Develop and display personalised and relevant advertising content for our users

- Analyse how our Services are used so we can improve them to engage and retain users
- Support our marketing activities
- o Diagnose problems and/or prevent fraudulent activities
- Understand how our users use our products and services so we can improve user experience
- Legal Obligations. We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
- Vital Interests. We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

4. When and with whom do we share your personal information.

In Short: We may share information in specific situations described in this section and/or with the following third parties.

Vendors, Consultants, and Other Third-Party Service Providers. We may share your data with third-party vendors, service providers, contractors, or agents ('third parties') who perform services for us or on our behalf and require access to such information to do that work. We have contracts in place with our third parties, which are designed to help safeguard your personal information. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will also not share your personal information with any organisation apart from us. They also commit to protect the data they hold on our behalf and to retain it for the period we instruct. The third parties we may share personal information with are as follows:

• Advertising, Direct Marketing, and Lead Generation
HubSpot Lead Management and HubSpot CRM

Content Optimisation

Typeform embed, Instagram embed and Google Site Search

Data Backup and Security

Dropbox Backup

Retargeting Platforms

Google Ads Remarketing, Facebook Remarketing, Facebook Custom Audience, Google Analytics Remarketing and LinkedIn Website Retargeting

Social Media Sharing and Advertising

LinkedIn advertising, LinkedIn social plugins, Facebook advertising, Facebook social plugins and Instagram advertising

Web and Mobile Analytics

Google Analytics, Facebook Analytics, Google Ads, HubSpot Analytics, Visitor Analytics and Facebook Ads conversion tracking

Website Hosting

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• Website Testing

Google Website Optimizer

We may also need to share your personal information in the following situations:

- Business Transfers. We may share or transfer your information in connection
 with, or during negotiations of, any merger, sale of company assets,
 financing, or acquisition of all or a portion of our business to another
 company.
- When we use Google Maps Platform APIs. We may share your information with certain Google Maps Platform APIs (e.g. Google Maps API, Places API). To find out more about Google's Privacy Policy, please refer to this <u>link.</u>

5. Do we use cookies and other tracking technologies?

In Short: We may use cookies and other tracking technologies to collect and store your information.

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we sue such technologies and how you can refuse certain cookies is set out in our Cookie Notice.

6. How long do we keep your information?

In Short: We keep your information for as long as necessary to fulfil the purposes outline in this privacy notice unless otherwise specified by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than 1 year.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

7. How do we keep your information safe?

In Short: We aim to protect your personal information through a system of organisational and technical security measures.

We have implemented appropriate and reasonable technical and organisational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

8. Do we collect information from minors?

In Short: We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at mail@constructivestudio.com.

9. What are your privacy rights?

In Short: In some regions, such as the European Economic Area (EEA) and United Kingdom (UK), you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.

In some regions (like the EEA and UK), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us by using

the contact details provided in the section 'How can you contact us about this notice?' below.

We will consider and act upon any request in accordance with applicable data protection laws.

If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: https://ec.europa.euljustice/data-protection/bodies/authorities/index en.htm.

If you are located in Switzerland, the contact details for the data protection authorities are available here: https://www.edoeb.admin.ch/edoeb/en/home.html.

<u>Withdrawing your consent:</u> If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section 'How can you contact us about this notice?' below.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Opting out of marketing and promotional communications: You can unsubscribe from our marketing and promotional communications at any time by clicking on the unsubscribe link in the emails that we send, or by contacting us using the details provided in the section 'How can you contact us about this notice?' below. You will then be removed from the marketing lists. However, we may still communicate with you — for example, to send you service-related messages that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes.

<u>Cookies and similar technologies:</u> Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services. To opt out of interest-based advertising by advertisers on our Services visit http://www.aboutads.info/choices/.

If you have questions or comments about your privacy rights, you may email us at mail@constructivestudio.com.

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ('DNT') feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognising and implementing DNT signals has been finalised. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

11. Do California Residents have specific privacy rights?

In Short: Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.

California Civil Code Section 1798.83, also known as the 'Shine The Light' law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with Services, you have the right to request removal of unwanted data that you publicly post on the Services. To request removal of such data, please contact us using the contact information provided below and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Services, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g. backups, etc.).

12. Do we make updates to this notice?

In Short: Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated 'Revised' date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

13. How can you contact us about this notice?

If you have questions or comments about this notice, you may email us at mail@constructivestudio.com or by post to:

Constructive Studio Studio 36, Archway Studios Bickerton House, 25-27 Bickerton Road London, London N19 5JT England

14. How can you review, update, or delete the data we collect from you?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it. To request to review, update, or delete your personal information, please fill out and submit a <u>data subject access request</u>.