

**GDPR & PECR DATA POLICY**  
**+**  
**COOKIE POLICY**  
**+**  
**ACCESSIBILITY**



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# OVERVIEW

You can contact “Active Organisation Ltd trading as Ooba Creative” (Active) with any communication which you genuinely consider to be of “legitimate interest”. Active completely trust you to store our contact data (personal or business) and relevant information in whatever manner your organisation thinks best complies to good data practices.

Active gives you the right to pass our details on to whoever you reasonably think is “good to do so” in order to fulfill the responsible need for networking, commerce, introducing Active to people (either face-to-face or electronically), telling people about our work and generally aiding the purpose of winning and doing business.

In return, we expect you to allow me to do the same. If we differ in our policies, we can always unsubscribe, disconnect and/or cease doing business together. Apart from that, we’ve probably got more important things to be getting on with if we are just nice people who behave in a trustworthy and sensible manner.

## 1. THE IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLERS

Adam Clark, Managing Director of Active Organisation Ltd trading as Ooba Creative (Active)

## 2. THE PURPOSE OF PROCESSING THE PERSONAL DATA AND YOUR INTENTIONS FOR IT

A wide range of business activities. From trading (i.e. client & supplier relationships) to processing leads, prospects, friends, family and anyone who we have met who we feel we would like to keep in contact with. e.g. other business people we might not trade with but met at networking meetings etc.

## 3. HOW LONG THE PERSONAL DATA WILL BE STORED FOR?

As long as we feel necessary or until the person asks for their data to be deleted. If someone asks not to be contacted again, we try not to agree to completely delete the data because, otherwise, we run the risk of adding that person to our database again in error.

## 4. THE RIGHTS TO REQUEST PERSONAL DATA, ERASE IT OR OBJECT TO ITS COLLECTION

Contact us and ask. We will comply with your request within 48hours.

## 5. THE CONTACT DETAILS FOR A REGULATORY AUTHORITY IN THE EVENT OF A COMPLAINT

Call us first and we’ll put it right. If you aren’t happy about it, then please contact the ICO.

## 6. WHO THE RECIPIENTS OF THE PERSONAL DATA ARE?

No one else but Adam Clark, Managing Director of Active

## **7. IF THERE ARE INTENTIONS TO TRANSFER YOUR PERSONAL DETAILS TO COUNTRIES OUTSIDE THE EU AND WHAT LEVEL OF DATA PROTECTION SAFEGUARDS ARE OFFERED**

No intentions. Data may be stored on our web server (UK), Amazon Web Services (UK/EU), our office laptops & PCs (UK), Dropbox (UK), MS Outlook (UK), Gmail (UK), Mobile and Tablet devices (UK), bits of paper (UK). However, should we need to travel to a country outside the EU (for work or holiday) and need to take devices and laptops, we will not ask your permission beforehand. As well as this, services such as Gmail and other 3rd party services (e.g. Facebook, Instagram, Miro, Asana, Clickup, OneDrive, CloudinaryCDN) may store data outside the EU without us knowing. By working with Active, you accept that there may be the possibility that this may be the case and we have no control over these third party services.

## **8. WHETHER SUPPLYING PERSONAL DATA IS OBLIGATORY OR VOLUNTARY, ALONG WITH ANY CONSEQUENCES FOR FAILING TO PROVIDE IT**

Supplying your data (and Active consider all data as 'personal') to Active is usually voluntary. As such, it has to be stored somewhere. And, as such, we have technically "processed" it. So, if you supply your data, then you have supplied your data. There are, and never will be, any detrimental consequences for not providing your data.

## **9. IF THE PERSONAL DATA IS NOT COLLECTED FROM THE CUSTOMERS THEMSELVES, THEN YOU MUST STATE WHERE IT ORIGINATES FROM**

Active will try and keep a record of when and where data was obtained from. This is not always easy. We could have Googled you, found your website and then written down (or stored in our CRM) your details and then contacted you because we had a legitimate interest to offer you relevant products and services. Or someone could have passed your details to us as a referral/ recommendation. It could be that you emailed us or called us. It could be that we met you decades before any of this legislation existed. We'll make every effort to log "the source" and "the date" as best as possible.

### **Online Forms, Emails, Calls, Skype, WhatsApp... and similar**

By definition, if you email us, fill in a form, call us or make contact in **any** way, there will be some kind of storage of data. Even if it is just an email sitting on a server somewhere with your email footer in it. Whether it's a Skype call, mobile phone call or you fill out a form to join a webinar or download an eBook, you are submitting your details and, as such, they will have to be "processed" somehow, somehow, somewhere and you are giving us permission to do so.

Therefore, you give us permission to contact you back with all and any reasonable information. You may not have given us specific permission to contact you back with promotional newsletters or product/service information. But, you are (by default) giving us permission to store your data somewhere and then respond to your interaction by reasonable means with reasonable information.

# COOKIE POLICY FOR Ooba CREATIVE

This is the Cookie Policy for Active and applies to all our websites unless specifically stated otherwise.

## WHAT ARE COOKIES

As is common practice with almost all professional websites this site uses cookies, which are tiny files that are downloaded to your computer, to improve your experience. This page describes what information they gather, how we use it and why we sometimes need to store these cookies. We will also share how you can prevent these cookies from being stored however this may downgrade or 'break' certain elements of the site's functionality.

For more general information on cookies see the Wikipedia article on HTTP Cookies.

## HOW WE USE COOKIES

We use cookies for a variety of reasons detailed below. Unfortunately, in most cases, there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to this site. It is recommended that you leave on all cookies if you are not sure whether you need them or not in case they are used to provide a service that you use.

## DISABLING COOKIES

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will affect the functionality of this and many other websites that you visit. Disabling cookies will usually result in also disabling certain functionality and features of this site. Therefore it is recommended that you do not disable cookies.

## THE COOKIES ACTIVE SET

### Account related cookies

If you create an account with us on our website then we will use cookies for the management of the signup process and general administration. These cookies will usually be deleted when you log out. However, in some cases they may remain afterward to remember your site preferences after having logged out ready for when you log back in again.

### Login related cookies

We use cookies when you are logged in so that we can remember this fact (i.e. that you are indeed logged in). This prevents you from having to log in every single time you visit a new page. These cookies are removed and cleared when you log out to ensure that you can only access restricted features and areas when logged in.

## COOKIES THIRD PARTY SCRIPTS SET

In some special cases, we also use cookies provided by trusted third parties. The following section

details which third party cookies you might encounter through an Active website.

### **Google Analytics**

This site uses Google Analytics which is one of the most widespread and trusted analytics solutions on the web for helping us to understand how you use the site and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content.

For more information on Google Analytics cookies, see the official Google Analytics page.

Third party analytics are used to track and measure usage of this site so that we can continue to produce engaging content. These cookies may track things such as how long you spend on the site or pages you visit which helps us to understand how we can improve the site for you.

### **Google Ads**

The Google Ads service we use to serve advertising, uses a DoubleClick cookie to serve more relevant ads across the web and limit the number of times that a given ad is shown to you.

For more information on Google Ads see the official Google FAQs.

If you do not see any adverts on the website, then these cookies are not being used.

### **Social Media Share Buttons**

We also use social media buttons and/or plugins on this site that allow you to connect with your social network in various ways. For these to work the following social media sites including; Facebook, Twitter, Instagram, LinkedIn, may set cookies through our site which may be used to enhance your profile on their site or contribute to the data they hold for various purposes outlined in their respective privacy policies.

### **Smartlook**

Smartlook is a tool we use to assess user experiences and user interaction with the site. It creates a virtual 'video' of a user's interaction with the site and is incredibly useful for helping us make our websites better for users. It is not intrusive in any way. It does not record form data entry or any individual/personalised information.

### **Google Tag Manager**

Google Tag Manager is a tool which safely injects tracking codes (such as the Google Analytics code) into the web pages. We use this tool to pass actions (e.g. form submissions, certain clicks, PDF downloads) into Google Analytics that would not normally be tracked by the default/basic Google Analytics code alone. This is also used to track any clicks from any Google PPC advertising that you may have clicked on to land on our website.

## MORE INFORMATION

If there is a cookie that you aren't sure whether you need or not, with an Active website, because we do not impose sales tactics in our sites, it is usually safer to leave cookies enabled in case it does interfere/deminish one of the features you use on our site.

However, if you are still looking for more information then you can contact us through one of our preferred contact methods:

Email: [hi@oobacreative.co.uk](mailto:hi@oobacreative.co.uk)

# ACCESSIBILITY POLICY

## WHAT IS ACCESSIBILITY?

Accessibility is the term used to describe whether a website can be used by people of all abilities / disabilities on a range of differing digital devices.

The way a person perceives information is affected by their ability / disability along with how they navigate between website pages. A website can only be classed as accessible if all people, including the elderly and disabled, can use it.

The BBC provide a comprehensive guide covering how to get the most of the accessibility features and assistive technologies available for your computer, operating system and web browser. The following topics are covered:

- I can't see very well
- I am blind
- I can't hear very well
- I find words difficult
- I find a keyboard or mouse hard to use

Rather than repeat/replicate the excellent content provided by the BBC, further information can be found by visiting: <http://www.bbc.co.uk/accessibility/>

## Policy Information

- Owner: Managing Director - Adam Clark
- Last review date: June 2019
- Next review date: June 2020
- First Approved: January 2012