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Privacy Policy

1.0 OUR CORE BELIEFS REGARDING USER PRIVACY AND DATA PROTECTION

User privacy and data protection are human rights We have a duty of care to the people within our data. Data is a liability, it should only be collected and processed when absolutely necessary. We will never sell, rent or otherwise distribute or make public your personal information

2.0 RELEVANT LEGISLATION

Along with our business and internal computer systems, this website is designed to comply with the following national and international legislation with regards to data protection and user privacy:

UK Data Protection Act 1988 (DPA)
EU Data Protection Directive 1995 (DPD)
EU General Data Protection Regulation 2018 (GDPR)

This site's compliance with the above legislation, all of which are stringent in nature, means that this site is likely compliant with the data protection and user privacy legislation set out by many other countries and territories as well. If you are unsure about whether this site is compliant with your own country of residences' specific data protection and user privacy legislation you should contact our data protection officer (details of whom can be found in section 9.0) for clarification.

3.0 PERSONAL INFORMATION THAT THIS WEBSITE COLLECTS AND WHY WE COLLECT IT

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Like most websites, this site uses Google Analytics to track user interaction. We use this data to determine the number of people using our site, to better understand how they find and use our web pages and to see their journey through the website.

Although Google Analytics records data such as your geographical location, device, internet browser and operating system, none of this information personally identifies you to us. Google Analytics also records your computer's IP address which could be used to personally identify you but Google do not grant us access to this. We consider Google to be a third party data processor (see section 6.0 below).



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Google Analytics makes use of cookies, details of which can be found on <u>Google's</u> developer guides.

Disabling cookies on your internet browser will stop Google Analytics from tracking any part of your visit to pages within this website.

3.1 Contact forms and email links

Should you choose to contact us using the email link like the one found at https://www.philosophydesign.com/ - top left of screen, none of the data that you supply will be stored by this website or passed to / be processed by any of the third party data processors defined in section 6.0. Instead the data will be collated into an email and sent to us over the Simple Mail Transfer Protocol (SMTP). Our SMTP servers are protected by SSL meaning that the email content is encrypted using SHA-2, 256-bit cryptography before being sent across the internet. The email content is then decrypted by our local computers and devices.

3.2 Email newsletter

If you choose to receive our email newsletter, the email address that you submit to us will be forwarded to <u>dotmailer</u> who provide us with email marketing services. We consider <u>dotmailer</u> to be a third party data processor (see section 6.0 below). The email address that you submit will not be stored within this website's own database or in any of our internal computer systems.

Your email address will remain within dotmailer's database for as long as we continue to use dotmailer's services for email marketing or until you specifically request removal from the list. You can do this by unsubscribing using the unsubscribe links contained in any email newsletters that we send you or by requesting removal via email. When requesting removal via email, please send your email to us using the email account that is subscribed to the mailing list.

If you are under 16 years of age you MUST obtain parental consent before joining our email newsletter. While your email address remains within the dotmailer database, you will receive periodic (approximately three times a year)



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3.4 Applying to work at Philosophy

If you submit an application to work at Philosophy we will use your personal information to process your application and to produce and monitor recruitment statistics. We will not take up references without your prior permission. We will not share or disclose your information unless you have given us your consent or we are required to by law.

We will retain personal information relating to unsuccessful applicants for no longer than 12 months, for use in the event of an appeal.

4.0 HOW WE STORE YOUR PERSONAL INFORMATION

In the near future we aim to change the storage of data to a pseudonymous fashion meaning that the data would require additional processing using a separately stored 'key' before it could be used to identify an individual.

Pseudonymisation is a recent requirement of the GDPR which many web application developers are currently working to fully implement. We are committed to keeping it as a high priority and will implement it on this website as soon as we are able to.

4.1 How we would use your telephone number for marketing campaigns

Text messages and contact via telephone provide a direct way to contact and share information with you about the services we can deliver to you. It can also help you receive important promotional/marketing messages which may interest or help you.

We may use your telephone number that you have provided us to keep in contact with you by text. When we send SMS/text messages, there may be someone in your household who may read the message before you are able to. You may like to inform the people you live with that you may receive text messages from time to time.

When you supply your telephone contact details, you can ask us to either send or not send promotional marketing SMS/text messages. You can opt-out of receiving these types of SMS/text messages by responding with: OPT OUT, OR BY EMAILING info@philosophydesign.com

We will not share your telephone number with any third parties.

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4.2 Contacting us about your personal information

We will be as open as possible with you about the personal information we hold about you, and if something is wrong we want to work with you to put it right.

You have the right to have inaccurate/outdated information amended, deleted, or destroyed. If any of your circumstances change please tell the directors. If you want to find what information we are storing please contact Natasha Anslow or Sara Woods at 91 Paul Street, London EC2A 4NY.

5.0 ABOUT THIS WEBSITE'S SERVER

This website is hosted by <u>DigitalOcean</u> with data centres located in some of the most respected data centre facility providers in the world. It leverages all of the capabilities of these providers including physical security and environmental controls to secure their infrastructure from physical threat or impact. Each site is staffed 24/7 with on-site physical security to protect against unauthorized entry. Some of the data centre's more notable security features are as follows:

- 3m rota-spike security fence and perimeter anti ram barriers
- Blast proof anti-intruder shielded external windows and doors
- Biometric readers with two-factor authentication
- Facilities are unmarked as to not draw attention from the outside
- Battery and generator back up with generator fuel carrier redundancy
- Secure loading zones for delivery of equipment
- Proximity access locks on all external and internal doors Interlocked mantrap doors with biometric iris scanners to gain access into data floors Server cabinets have locked doors (no open racks)
- Perimeter and internal IP CCTV system monitored 24×7
- 24×7 on-site security guards with static and mobile patrols All on-site personnel are security vetted to BS7858 standard Only authorised security cleared staff are allowed into the facility.

5.1 Infrastructure security

<u>DigitalOcean's</u> infrastructure is secured through a defense-in-depth layered approach. Access to the management network infrastructure is provided through multi-factor authentication points, which restrict network-level access to infrastructure based on job function utilising the principle of least privilege. All access to the ingress points are closely monitored, and are subject to stringent change control mechanisms.



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Systems are protected through key-based authentication and access is limited by Role-Based Access Control (RBAC). RBAC ensures that only the users who require access to a system are able to login. We consider any system which houses customer data that we collect, or systems which house the data customers store with us to be of the highest sensitivity. As such, access to these systems is extremely limited and closely monitored.

Additionally, hard drives and infrastructure are securely erased before being decommissioned or reused to ensure that your data remains secure.

5.2 Snapshots and Backups

Snapshots and Backups are stored on an internal non-publicly visible network on NAS/SAN servers. Customers can directly manage the regions where their snapshots and backups exist which allows the customer to control where their data resides within our data centres for security and compliance purposes

6.0 OUR THIRD PARTY PROCESSORS

We use a number of third parties to process personal data on our behalf. These third parties have been carefully chosen and all of them comply with the legislation set out in section 2.0. All 3 of these third parties are based in either UK or the USA and are EU-U.S Privacy Shield compliant.

Google (<u>Privacy policy</u>) dotmailer (<u>Privacy policy</u>) mailchimp (<u>Privacy policy</u>) DigitalOcean (Privacy policy)

7.0 DATA BREACHES

We will report any unlawful data breach of this website's database or the database(s) of any of our third party data processors to any and all relevant persons and authorities within 72 hours of the breach if it is apparent that personal data stored in an identifiable manner has been stolen.

8.0 DATA CONTROLLER

The data controller of this website is: Philosophy Design Limited, a UK Private limited Company with company number: 3902537

Whose registered office is: 91 Paul Street, London EC2A 4NY and whose operating office is: also at the above address.

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9.0 CHANGES TO OUR PRIVACY POLICY

This privacy policy may change from time to time inline with legislation or industry developments. We will not explicitly inform our clients or website users of these changes. Instead, we recommend that you check this page occasionally for any policy changes.