Tone Product Design Ltd. Customer Privacy Policy

This privacy notice tells you what to expect us to do with your personal information.

Contact details

Somerset House, Strand, London, London, WC2R 1LA, GB

020 8191 7379

studio@tone.design

What information we collect, use, and why

We collect or use the following information to **provide and improve products and services for clients**:

- Names and contact details
- Addresses
- Occupation
- Usage data (including information about how you interact with and use our website, products and services)
- Audio recordings (eg calls)
- Records of meetings and decisions

We collect or use the following personal information for the **operation of client or customer accounts**:

- Names and contact details
- Addresses
- Records of meetings and decisions
- Bank account details

We collect or use the following personal information for **information updates or marketing purposes**:

- Names and contact details
- Addresses
- Usage data (including information about how you interact with and use our website, products and services)

We collect or use the following personal information to **comply with legal requirements**:

- Name
- Contact information

Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. You can read more about this right here.
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. You can read more about this right here.
- **Your right to erasure** - You have the right to ask us to delete your personal information. You can read more about this right here.
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. You can read more about this right here.
- **Your right to object to processing** - You have the right to object to the processing of your personal data. You can read more about this right here.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. You can read more about this right here.
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. You can read more about this right here.

If you make a request, we must respond to you without undue delay and in any event within one month. To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide and improve products and services for clients** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

    - This data allows us to communicate efficiently, coordinate with partners and subcontractors, and ensure that projects are completed to the highest standards. The benefit of collecting and using this information is essential for the smooth running of our business and delivering high-quality services. Our use of this data is limited to these legitimate business purposes and does not outweigh the rights or privacy of the individuals concerned.

Our lawful bases for collecting or using personal information for the **operation of client or customer accounts** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

- We collect and use personal information to efficiently manage and maintain client accounts, ensuring clear communication, accurate billing, and the smooth delivery of services. This information enables us to provide personalized service, respond to client needs, and track project progress, which benefits both our clients and our business.

Our lawful bases for collecting or using personal information for **information updates or marketing purposes** are:

- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
    - We collect and use personal information to provide clients and potential clients with relevant updates about our services, industry developments, and opportunities that may be of interest to them. This helps us maintain strong client relationships and ensures that contacts are informed about innovations or services that could benefit their projects. We carefully balance our marketing activities with the individuals' right to privacy by limiting the use of personal data only to relevant communications. We offer the ability to opt out of this at any time by simply contacting us at studio@tone.design.

Our lawful bases for collecting or using personal information to **comply with legal requirements**:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Where we get personal information from

- Directly from you
- CCTV footage or other recordings
- Publicly available sources
- Previous employment
- Suppliers and service providers

How long we keep information

We retain personal information for as long as necessary to fulfill the purposes for which it was collected, including to comply with legal, accounting, or reporting requirements. This is normally for 7 years or until you withdraw your consent.

Client Project Data: We retain project-related personal information for the duration of the project and up to 7 years after project completion. This retention period allows us to reference past work, address any follow-up inquiries, or comply with legal obligations.

Financial Records: Personal information related to invoicing and payments, such as billing information, is retained for 7 years, in line with tax and financial regulations.

Marketing and Communication Data: We retain personal information for marketing purposes (such as email addresses) until a client opts out or withdraws their consent, or for up to 3 years after the last interaction.

Legal Compliance and Dispute Resolution: In cases where legal action or disputes arise, personal data may be retained until the matter is fully resolved and for the relevant statutory limitation period.

General Contact Information: For clients with whom we have ongoing relationships, we may retain personal contact information indefinitely, unless we are requested to delete it or the data is no longer relevant.

Who we share information with

Data processors

IT and Secure Cloud Service Providers: Companies that provide cloud storage, IT support, AI services, or other digital infrastructure services (e.g., cloud storage for files or email hosting).

Subcontractors and Freelancers: Individuals or firms working on specific aspects of your projects who may need access to personal information to fulfill their tasks.

Accounting or Payroll Services: External firms managing financial transactions, invoicing, or payroll, which may need client contact details for billing or financial purposes.

Marketing and Communication Providers: Third-party companies providing marketing services, such as email marketing platforms, used for client communication and updates.

Legal, Business and Compliance Advisors: Suppliers and representatives contracted to us and providing advice and services related to contracts, law, compliance, regulation, business advice, and advisory consultancy.

Sharing information outside the UK

Your information will be primarily collected and processed in the UK. Where necessary, we may transfer personal information outside of the UK. When doing so, we comply with the UK GDPR, making sure appropriate safeguards are in place. For further information, please contact us using the contact information provided above.

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice. If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

https://www.ico.org.uk/