GDPR Privacy Policy & Cookie Policy – 41 Digital (Marketing) Ltd – June 2025

Here at 41 Digital (Marketing) Ltd, we take the security of your data very seriously and have strived to put measures and controls in place in order to preserve the integrity and safe nature of the information process and stored in our business.

When we process our customer's or site visitor personal data, such as their name, address, e-mail address, or telephone numbers, we ensure it will always be in line with the EU General Data Protection Regulations (GDPR), and in accordance with the Data Protection Bill in the UK. By means of this Privacy Policy and data protection declaration, 41 Digital (Marketing) Ltd would like to inform our customers of the nature, scope, and purpose of the personal data we collect, use, process and share. Furthermore, our customers are informed, by means of this policy of the rights to which they are entitled.

41 Digital (Marketing) Ltd has applied numerous technical and organisational factors to ensure the most up-to-date and complete protection of personal data processed through this website and other channels. However, Internet-based data transmissions may in principle have security gaps, so absolute protection may not be guaranteed. For this reason, every customer is free to transfer personal data to us via alternative means, e.g. by telephone.

1. **GDPR Definitions**

The data protection declaration of 41 Digital (Marketing) Ltd is based on the terms used by the European legislator for the adoption of the General Data Protection Regulations (GDPR). Our data protection declaration should be legible and understandable for everyone including our customers and business partners. To ensure this, we would like to explain the terminology used.

In this data protection declaration, we use the following terms:

1. Giving Consent

Consent by the data subject is freely given, specific, informed and an unambiguous indication of the customer's wishes by which they, by a statement or by a clear affirmative action, signifies agreement to the processing of their personal data.

2. Controller responsible for the processing

The Controller responsible for the processing is 41 Digital (Marketing) Ltd , which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are governed by the European Union or UK law.

3. Data subject

A data subject is any identified or identifiable natural person, whose personal data is processed by 41 Digital (Marketing) Ltd .

4. Personal data

Personal data means any information relating to an identified or identifiable natural person ("data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an

online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

5. Processing

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

6. Processor

A Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

7. Profiling

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

8. Anonymisation

Anonymisation is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately in a secure database. This is provided in the form of apply a SSL certificate to the website which encrypts data transferred between any contact / payment form and the database receiving, processing and or storing the data.

9. Recipient

A recipient is a natural or legal person, public authority, agency or another body, to which the personal data is disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with the European Union or UK law shall not be regarded as recipients; the processing of such data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

10. Restriction of processing

Restriction of processing is the highlighting of stored personal data so that no further processing of that data by 41 Digital (Marketing) Ltd or data processors is undertaken in the future.

11. Third party

A third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. **Name and Address of the controller**

The Controller for the purposes of the EU General Data Protection Regulation (GDPR), is:

41 Digital (Marketing) Ltd (Hereford) Ltd

40 Market Place, Belper, Derbyshire, United Kingdom, DE56 1FZ

A data subject may, at any time, contact our Data Protection Officer directly via email with questions concerning the protection of their data.

3. **Cookies**

41 Digital (Marketing) Ltd websites use cookies. Cookies are text files that are stored on a computer system via an internet browser.

Many internet sites and servers use cookies. Many cookies contain a so-called cookie ID. A cookie ID is a unique identifier of the cookie. It consists of a character string through which internet pages and servers can be assigned to the specific internet browser in which the cookie was stored. This allows visited internet sites and servers to differentiate the individual browser of the data subject from other internet browsers that contain other cookies. A specific internet browser can be recognized and identified using the unique cookie ID.

Through the use of cookies, 41 Digital (Marketing) Ltd can provide the users of this website with more user-friendly services that would not be possible without the use of cookies.

By means of a cookie, the information and offers on our website can be optimized with the user in mind. Cookies allow us, as previously mentioned, to recognize our website users. The purpose of this recognition is to make it easier for users to utilize our website. A website user that uses cookies does not have to enter access data each time the website is accessed, because this is taken over by the website, and the cookie is thus stored on the user's computer system. Another example is the cookie of a shopping cart in an online shop. The online store remembers the articles that a customer has placed in the virtual shopping cart via a cookie.

Our customers may, at any time, prevent the setting of cookies through our website by means of a corresponding setting of their Internet browser used, and may thus permanently deny the setting of cookies. Furthermore, already set cookies may be deleted at any time via an Internet browser or other software programs. This is possible in all popular Internet browsers.

If a customer deactivates the setting of cookies in the Internet browser used, not all functions of our website may be usable.

If you require any further information on cookies including how to see what cookies have been set and how to manage, delete and turn them off visit www.aboutcookies.org or www.allaboutcookies.org . Please note these are external websites and 41 Digital (Marketing) Ltd is

not responsible for the accuracy of the information on these sites.

If you decide to share our content using social media sharing tools on our Sites, you may be presented with cookies from third party sites such as Facebook, Twitter or Google+. 41 Digital (Marketing) Ltd does not control how these sites use cookies so you should refer to the appropriate site's own privacy and cookie policy to understand how they use cookies.

4. **Collection of general data and information**

41 Digital (Marketing) Ltd website collects a series of general data and information when a data subject or automated system accesses the website. This general data and information is stored in the server log files. General data collected may be (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (so-called referrers), (4) the sub-websites, (5) the date and time of access to the Internet site, (6) an Internet protocol address (IP address), (7) the Internet service provider of the accessing system, and (8) any other similar data and information that may be used in the event of attacks on our information technology systems.

When using such general data and information, 41 Digital (Marketing) Ltd does not draw any conclusions about the data subject. Rather, this information is needed to (1) deliver the content of our website correctly, (2) optimize the content of our website as well as its advertisement, (3) ensure the long-term viability of our information technology systems and website technology, and (4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack. Therefore, 41 Digital (Marketing) Ltd analyses anonymously collected data and information statistically, with the aim of increasing the data protection and data security of our company, and to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

5. **Registration / Contact Forms on our website**

Our customers have the ability to register / contacts us on our website and the submission of personal data. The personal data entered by the customers collected and stored exclusively for internal use by 41 Digital (Marketing) Ltd , for our own purposes. We may request transfer to one or more processors (e.g. a brochure fulfilment service) that also uses the customer personal data for an internal purpose which is attributable to the controller.

By registering on the website of 41 Digital (Marketing) Ltd , the IP address—assigned by the Internet service provider (ISP) and used by the customer—date, and time of the registration are also stored. The storage of this data takes place against the background that this is the only way to prevent the misuse of our services, and, if necessary, to make it possible to investigate committed offences. This data is not passed on to third parties unless there is a statutory obligation to pass on the data, or if the transfer serves the aim of criminal prosecution.

The registration of the customer, with the voluntary submission of personal data, is intended to enable 41 Digital (Marketing) Ltd to offer the customer content or services that may only be offered to registered users due to the nature of the matter in question. Registered customers are free to change the personal data specified during the registration / completion of the contact form at any time, or to exercise their right to be forgotten and request their personal data be completely deleted through the right of erasure.

6. **Direct marketing**

41 Digital (Marketing) Ltd operate a marketing communications strategy in which carefully selected customers and/or data subjects are presented with tailored offers for goods or services which we believe may be of interest. Marketing communications may be sent via ordinary postal mail, SMS text messages, email or live chat on our websites. Customers and data subjects are requested to specify and subscribe to this activity if they so wish as detailed on the contact / registration form on this website.

7. **Subscription to electronic communications**

41 Digital (Marketing) Ltd website users are given the opportunity to subscribe to electronic communications.

41 Digital (Marketing) Ltd informs its customers regularly by means of an electronic communication about news and events that may be of interest to data subjects. The electronic communication may only be received by the data subject if (1) the data subject has a valid e-mail address and (2) the data subject registers for the electronic communication.

The personal data collected as part of a registration for the electronic communication will only be used to send our electronic communications. The subscription to our electronic communications may be terminated by the data subject at any time by using the 'unsubscribe' link on the electronic communication or via the 41 Digital (Marketing) Ltd website or communicate this to 41 Digital (Marketing) Ltd via alternative means, e.g. by telephone, sending an email to with the Title "Please unsubscribe me".

8. **Electronic communication-Tracking**

The electronic communications of 41 Digital (Marketing) Ltd contain so-called tracking pixels. A tracking pixel is a miniature graphic embedded in such communications, which are sent in HTML format to enable log file recording and analysis. This allows a statistical analysis of the success or failure of online marketing campaigns. Based on the embedded tracking pixel, 41 Digital (Marketing) Ltd may see if and when an e-mail was opened by a data subject, and which links in the e-mail were called up by data subjects.

Such personal data collected in the tracking pixels contained in the electronic communications are stored and analysed by 41 Digital (Marketing) Ltd in order to optimize the sending of the electronic communication, as well as to tailor the content of future electronic communications even better to the interests of the customer. This personal data collected will not be passed on to third parties. After a revocation request is received, this personal data will be deleted by 41 Digital (Marketing) Ltd .

41 Digital (Marketing) Ltd automatically regards a withdrawal from the receipt of the electronic communications as a revocation of consent.

9. **Customer contact via the website**

41 Digital (Marketing) Ltd website contains information that enables direct communication with us and includes our email address. If a customer contacts 41 Digital (Marketing) Ltd by e-mail or via a contact form, their personal data is automatically stored for the purpose of processing or contacting the customer. There is no transfer of this personal data to third parties, without the customer's explicit consent.

10. **Routine erasure of personal data**

41 Digital (Marketing) Ltd shall process and store the personal data of the customer only for the period necessary, or as far as this is granted by the European legislator or other legislators in laws or regulations to which 41 Digital (Marketing) Ltd is subject to. If the storage purpose is not applicable, or if a storage period prescribed by the European legislator or another competent legislator expires, the personal data is routinely erased in accordance with legal requirements.

11. **Rights of the data subject**

1. Right of access

Each customer shall have the right granted by the European legislator to obtain from 41 Digital (Marketing) Ltd details about his or her personal data stored at any time and a copy of this information. Furthermore, the European directives and regulations grant the data subject access to the following information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the customer, or to object to such processing;
- the existence of the right to lodge a complaint with the Information Commissioner's Office which is the UK's data protection regulator.
- where the personal data are not collected from the customer, any available information as to their source;
- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the customer.

Furthermore, the customer shall have a right to obtain information as to whether their personal data has been transferred outside the European Union to a third country or to an international organisation. Where this is the case, the customer shall have the right to be informed of the appropriate safeguards relating to the transfer.

If a customer wishes to avail themselves of this right of access they may, at any time, contact our Data Protection Officer via email.

2. Right to rectification

Each customer shall have the right granted by the European legislator to obtain from 41 Digital (Marketing) Ltd without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

If a customer wishes to exercise this right to rectification, they may, at any time, contact our Data Protection Officer via email.

3. Right to erasure (Right to be forgotten)

Each customer shall have the right granted by the European legislator to secure from 41 Digital (Marketing) Ltd the erasure of personal data concerning him or her without undue delay where one of the following grounds applies, as long as the processing is not necessary:

- The personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- The data subject withdraws consent to which the processing is based according to point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing.
- The data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR.
- The personal data has been unlawfully processed.
- The personal data must be erased for compliance with a legal obligation in the European Union or UK law to which the controller is subject.
- The personal data has been collected in relation to the offer of information society services directly to a child, referred to in Article 8(1) of the GDPR.

If one of the aforementioned reasons applies, and a customer wishes to request the erasure of personal data stored by 41 Digital (Marketing) Ltd , they may, at any time, contact our Data Protection Officer via email.

Where 41 Digital (Marketing) Ltd has made personal data public and is obliged pursuant to Article 17(1) to erase the personal data, 41 Digital (Marketing) Ltd shall, taking account of available technology and the cost of implementation, take reasonable steps, including technical measures, to inform other controllers processing the personal data that the customer has requested erasure by such controllers of any links to, or copy or replication of, those personal data, as far as processing is not required. The Data Protection Officer of 41 Digital (Marketing) Ltd will arrange the necessary measures in individual cases.

4. Right of restriction of processing

Each customer shall have the right granted by the European legislator to obtain from 41 Digital (Marketing) Ltd restriction of processing where one of the following applies:

- The accuracy of the personal data is contested by the customer, for a period enabling 41 Digital (Marketing) Ltd to verify the accuracy of the personal data.

- The processing is unlawful and the customer opposes the erasure of the personal data and requests instead the restriction of their use instead.
- 41 Digital (Marketing) Ltd no longer needs the personal data for the purposes of the processing, but they are required by the customer for the establishment, exercise or defence of legal claims.
- The customer has objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of 41 Digital (Marketing) Ltd override those of the data subject.

5. Right to data portability

Each data subject shall have the right granted by the European legislator, to receive the personal data concerning themselves, which was provided to 41 Digital (Marketing) Ltd , in a structured, commonly used and machine-readable format. The data subject shall have the right to transmit such data to another controller without hindrance from 41 Digital (Marketing) Ltd to which the personal data have been provided, as long as the processing is based on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Furthermore, in exercising his or her right to data portability pursuant to Article 20(1) of the GDPR, the customer shall have the right to have personal data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others.

6. Right to object

Each customer shall have the right granted by the European legislator to object, on grounds relating to his or her particular situation, at any time, to processing of personal data concerning him or her, which is based on point (e) or (f) of Article 6(1) of the GDPR. This also applies to profiling based on these provisions.

41 Digital (Marketing) Ltd shall no longer process the personal data in the event of an objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the customer, or for the establishment, exercise or defence of legal claims.

If 41 Digital (Marketing) Ltd processes personal data for direct marketing purposes, the customer shall have the right to object at any time to processing of personal data concerning him or her for such marketing. This applies to profiling to the extent that it is related to such direct marketing. If the customer objects to 41 Digital (Marketing) Ltd processing the data for direct marketing purposes, 41 Digital (Marketing) Ltd will no longer process the personal data for these purposes.

In addition, the customer has the right, on grounds relating to his or her particular situation, to object to processing of personal data concerning him or her by 41 Digital (Marketing) Ltd for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) of the GDPR, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

7. Automated individual decision-making, including profiling

Each customer shall have the right granted by the European legislator not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) is not authorised by the European Union or UK law to which the controller is subject and which also lays down suitable measures to safeguard the customer's rights and freedoms and legitimate interests, or (3) is not based on the customers explicit consent.

If the decision (1) is necessary for entering into, or the performance of, a contract between the customer and 41 Digital (Marketing) Ltd , or (2) it is based on the customer's explicit consent, 41 Digital (Marketing) Ltd shall implement suitable measures to safeguard the customers rights and freedoms and legitimate interests, at least the right to obtain human intervention, to express his or her point of view and contest the decision.

8. Right to withdraw data protection consent

Each customer shall have the right granted by the European legislator to withdraw his or her consent to processing of his or her personal data at any time.

To make enquiries, exercise any of your rights set out in this Privacy Policy and/or make a complaint, please contact our Data Protection Officer at

12. **Legal basis for the processing**

Art. 6(1) lit. a GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the case, for example, when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on Article 6(1) lit. b GDPR. The same applies to such processing operations which are necessary for carrying out pre-contractual measures, for example in the case of inquiries concerning our products or services. If our company is subject to a legal obligation by which processing of personal data is required, such as for the fulfilment of tax obligations, the processing is based on Art. 6(1) lit. c GDPR. In rare cases, the processing of personal data may be necessary to protect the vital interests of the data subject or of another natural person. This would be the case, for example, if a visitor were injured in our company and their name, age, health data or other vital information would have to be passed on to a doctor, hospital or other third party. Then the processing would be based on Art. 6(1) lit. d GDPR. Finally, processing operations could be based on Article 6(1) lit. f GDPR. This legal basis is used for processing operations which are not covered by any of the above-mentioned legal grounds, if processing is necessary for the purposes of the legitimate interests pursued by our company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the customer which require protection of personal data. Such processing operations are particularly

permissible because they have been specifically mentioned by the European legislator who considered that a legitimate interest could be assumed if the customer is a client of the controller (Recital 47 Sentence 2 GDPR).

13. **Period for which the personal data will be stored**

There are no specific minimum or maximum periods for retaining personal data. Instead, 41 Digital (Marketing) Ltd only retain personal data for the duration of the processing required thereafter this personal data is routinely deleted.

14. **Provision of personal data as a statutory or a contractual requirement;**

When 41 Digital (Marketing) Ltd need to process someone's personal data because we need to fulfil our contractual obligations to them or because they have asked us to do something before entering into a contract (e.g. pay for goods or services).

There is an obligation on the customer to provide us with personal data when we sign a contract with them however if the customer elects to withhold their personal data then the contract would not be concluded.

15. **Existence of automated decision-making**

Our financial third-party data processors do operate automatic decision-making or profiling practices.

16. **If you wish to contact the Information Commissioners Office, you can do so here:**

https://ico.org.uk Telephone: 0303 123 1113

Changes to this Privacy Policy

41 Digital (Marketing) Ltd reserve the right to amend or modify this Privacy Policy at any time and any changes will be published on our website. The date of the most recent revision will appear on this web page. If we make significant changes to this policy, we may also notify you by other means such as sending an email. Where required by law we will obtain your consent to make these changes. If you do not agree with any changes, please do not continue to use our website and let us know that you wish to have your personal data deleted.