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## PRIVACY POLICY

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### BACKGROUND:

Red Smoke Group Limited (“**Red Smoke**”) understands that your privacy is important to you and that you care about how your personal data is used. Red Smoke respects and values the privacy of everyone who visits its website, <https://redsmokegroup.com> (“Website”). The Website will only collect and use personal data in ways that are described here, and in a way that is consistent with Red Smoke’s obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is deemed to occur upon your first use of the Website. If you do not accept and agree with this Privacy Policy, you must stop using the Website immediately.

### 1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

**“Cookie”** means a small text file placed on your computer or device by the Website when you visit certain parts of the Website. Details of the Cookies used by the Website are set out in Part 14, below; and

**“Cookie Law”** means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003

### 2. Information About Us

The Website is operated by Mediaslide SARL, a Limited Liability Company registered in France, under company number 790 183 826.

Registered address: 32 rue Fessart, 92100 Boulogne-Billancourt, France.

VAT number: FR15790183826

### 3. What Does This Policy Cover?

This Privacy Policy applies only to your use of the Website. The Website may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

### 4. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

### 5. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

**a) The right to be informed about our collection and use of your personal data.** This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 12.

- b) **The right to access the personal data we hold about you.** Part 10 will tell you how to do this.
- c) **The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete.** Please contact us using the details in Part 12 to find out more.
- d) **The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have.** Please contact us using the details in Part 12 to find out more.
- e) **The right to restrict (i.e. prevent) the processing of your personal data.**
- f) **The right to object to us using your personal data for a particular purpose or purposes.**
- g) **The right to data portability.** This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) **Rights relating to automated decision-making and profiling.** We do not use your personal data in this way.

For more information about Red Smoke's use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 12.

Further information about your rights can also be obtained from the Information Commissioner's Office (<https://ico.org.uk/>) or your local Citizens Advice Bureau (<https://citizensadvice.org.uk>).

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office (<https://ico.org.uk/>).

## 6. What Data Do We Collect?

Depending upon your use of the Website, we may collect some or all of the following personal and non-personal data (please also see Part 14 on our use of Cookies and similar technologies):

- IP address;
- Web browser type and version;
- Time zone setting;
- Browser plug in types;
- Operating system;
- Type of device used to access the Website;
- Location of access where using a mobile device;
- A list of URLs starting with a referring site, your activity on the Website, and the website you exit to;
- Become a Model Submission Form – (Email, Name, Gender, D.O.B, Height, Age, Address, Social Media, Pictures), consent must be given for us to hold and process your data before it will let you submit the form.

## 7. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one of the following purposes:

- Providing and managing your access to the Website.
- Personalising and tailoring your experience on the Website;
- Supplying our services to you. Your personal details are required in order for us to enter into a contract with you.

- Personalising and tailoring our services for you.
- Communicating with you. This may include responding to emails or calls from you.
- Analysing your use of the Website to enable us to continually improve the Website and your user experience.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email or telephone with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

Third Parties (including Google) whose content appears on the Website may use third-party Cookies, as detailed below in Part 14. Please refer to Part 14 for more information on controlling cookies. Please note that we do not control the activities of such third parties, nor the data that they collect and use themselves, and we advise you to check the privacy policies of any such third parties.

## 8. **How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected.

We will only transfer your personal data to countries that the European Commission has deemed to provide an adequate level of personal data protection. More information is available from the [European Commission](#).

## 9. **Do You Share My Personal Data?**

We will not share any of your personal data with any third parties for any purposes, subject to one important exception.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.]

## 10. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email shown in Part 12.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

## 11. **How Do You Use Cookies?**

All Cookies used by and on the Website are used in accordance with current Cookie Law.

Before Cookies are placed on your computer or device, you will be shown a cookie notification requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended.

The Website uses analytics services provided by Google. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how the Website is used. This, in turn, enables us to improve the Website and the services offered through it.

The analytics service(s) used by the Website use(s) Cookies to gather the required information. You do not have to allow us to use these Cookies, however whilst our use of them does not pose any risk to your privacy or your safe use of the Website, it does enable us to continually improve the Website,

making it a better and more useful experience for you.

The analytics service(s) used by the Website use(s) the following Cookies:

Name of Cookie	First / Third Party	Provider	Purpose	Default Expiration Time
_ga	Third	Google Analytics	Used to distinguish users.	2 years
_gid	Third	Google Analytics	Used to distinguish users.	24 hours
_gat	Third	Google Analytics	Used to throttle request rate.	1 minute

In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

## 12. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: [privacy@redsmokegroup.com](mailto:privacy@redsmokegroup.com)

## 13. Changes to this Privacy Policy

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on the Website and you will be deemed to have accepted the terms of the Privacy Policy on your first use of the Website following the alterations. We recommend that you check this page regularly to keep up-to-date.