

PRIVACY POLICY
(Updated July 29, 2024)

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SECTION 1: PURPOSE OF OUR PRIVACY POLICY

Our privacy policy aims to ensure full transparency regarding the collection, processing, and use of our users' personal data.

In accordance with *the General Data Protection Regulation* (GDPR) of 27 April 2016, our objective is to guarantee the security and confidentiality of personal information entrusted by users of the site.

This Privacy Policy sets out for users of the Site:

- The **type of data collected** by the company
- The **way in which their personal data is collected and processed**
- The **purpose of data collection**
- **To whom the personal data may be transmitted**
- The **data retention period**
- The **data controller**
- The **user rights**
- The **cookies Policy**

SECTION 2: GENERAL PRINCIPLES REGARDING COLLECTION AND PROCESSING OF DATA

In accordance with the provisions of Article 5 of European Regulation 2016/679, the collection and processing of data from Users of the Site is conducted in accordance with the following principles:

- **Legality, fairness, and transparency:** data may only be collected and processed with the consent of the user who is the owner of that data.

Whenever personal data is collected, the user will be informed that their data is being collected and for what purposes.

- **Limited purposes:** the collection and processing of data is carried out to meet one or more of the objectives set out in these terms and conditions of use.
- **Minimizing data collection and processing:** only data necessary for the proper execution of the objectives pursued by the website will be collected.
- **Data storage for a limited period of time:** the data will be stored for a limited period of time, of which the user will be informed of. When this information cannot be provided, the user will be informed of the criteria used to determine the storage duration.
- **Integrity and confidentiality of data collected and processed:** the data controller undertakes to guarantee the integrity and confidentiality of the data collected.

To comply with the law, and specifically with the demands laid out in Article 6 of the European Regulation 2016/679, the collection and processing of personal data can only occur when at least one of the following conditions has been met:

- The user has expressly consented to processing of the data
- Processing is necessary for the proper execution of a contract
- Processing is based upon a legal obligation
- Processing is necessary to protect the vital interest of the data subject, or of another private individual
- Processing is necessary to carry out an operation of public interest, or otherwise resulting from the exercise of public authority
- The processing and collection of personal data is necessary for the legitimate and private interests pursued by the controller or by a third party

SECTION 3: DEFINITIONS

- **"User"**: any person who browses, reads, views, and uses the S.A.C Studio website.
- **"Personal data"**: any information relating to a natural identified or identifiable person. A natural person who can be identified, directly or indirectly, by data such as: first name, last name, email address, location data, online identifier, voice, etc., is deemed to be identifiable.
- **" Processing "**: any operation or set of operations carried out on data, personal data, or sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, retention, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of making available, reconciliation or interconnection, limitation, erasure or destruction.
- **"Controller"**: the natural person who determines the purposes and means of the processing of personal data.
- **"GDPR"**: General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 main regulation on the protection of Personal Data within the European Union
- **"Cookie"**: small text file sent to your browser via the visited website. Thanks to this cookie, information about your visit is recorded on the website, thus facilitating your subsequent navigation on it, and securing your connection.

SECTION 4: TYPE OF DATA COLLECTED

The data collected is essential for the provision of our services and is collected in an ethical and transparent manner.

The following personal information is collected from our users:

- **Full Name**
- **Phone number**
- **Email address**
- **Mailing address**
- **Voice**
- **Photos**

SECTION 5: PURPOSE OF DATA COLLECTION

Data is collected only for the following purposes:

- **First and last name:** for the customer's identification and the issue of an invoice.
- **Email address:** for communication with the customer.
- **Mailing address:** for drawing up an invoice.
- **Phone number:** for communication with the customer.
- **Voice:** to host the actors' demo tape.
- **Photos:** to host the actors' demo tape.

SECTION 6: DATA RECIPIENT

The company, within its framework, is the main recipient of the data collected.

We undertake to treat this data with the utmost confidentiality and only for the purposes indicated above.

To provide our services, several data operations require the intervention of external providers, chosen for their reliability and compliance with data protection regulations.

Personal data passes through the following payment provider:

- **STRIPE**

The user is informed that no banking information is transmitted to the company.

Bank information is encrypted and transmitted to the payment providers mentioned above.

Personal data may also pass through these other third parties:

- **Hostinger:** web hosting service provider for the company's website and webmail platform.

- **Le Market'LAB:** marketing management platform used to analyze and optimize marketing campaigns. The platform is also involved in the management of the site.
- **Calendly:** online appointment scheduling tool used to organize coaching sessions and other meetings.
- **Cal.com:** online appointment scheduling tool.
- **MailChimp:** email marketing service used to send newsletters and promotional communications.
- **Google Analytics:** web analytics service used to track and report website traffic.
- **LinkedIn Ads:** advertising platform used to serve targeted ads on LinkedIn.
- **Meta Pixel:** Meta analytics tool used to track conversions and optimize social media ads.
- **Google Forms:** online form building service used to collect information from customers and users.
- **Gmail:** email service used to communicate with customers and partners.
- **Google Drive:** online storage service used to back up and share files between team members.
- **WeTransfer:** file transfer service used to send large files to customers and partners.

These tools have their own privacy policies, which the customer undertakes to consult and consent to before subscribing to the company's services.

The company undertakes never to disclose, sell, or share the data collected from its users without first obtaining their explicit consent.

SECTION 7: DATA STORAGE PERIOD

The data collected by the company is kept for periods defined according to their nature and legal and operational needs:

- **Data related to order management and the commercial relationship:** this information is kept for the duration of the business relationship with the user. Following the last email interaction, this data is stored for a period of **3 years** for commercial monitoring purposes.
- **Data related to the company's legal retention obligations:** this information is retained for 10 years.
- **Payment data:** in accordance with the payment terms, the company does not store payment data.
- **Data for statistical and marketing analysis:** to better understand the needs of our users and improve our services, the retention of this data is 3 years after the end of the commercial relationship, anonymously.

Where the data processing is based on the user's consent, the user may withdraw it at any time, without affecting the lawfulness of the processing based on the consent made before such withdrawal.

The company undertakes to respect these retention periods and to ensure the protection of personal data throughout their lifespan.

The company undertakes to keep personal data only for the time necessary to achieve the purposes for which it was collected or to comply with legal obligations.

SECTION 8: PROCESSING OF PERSONAL DATA

The controller of personal data is Mr. Ricardo Rhodes who can be contacted by email at the following address: ricardorhodes@sacstudio.be from 8 am to 12 pm and from 2 pm to 6 pm, Monday to Friday.

The data controller is responsible for determining the purposes and means used to process personal data.

The data controller undertakes to protect any personal data collected, not to transmit this to third parties without the user having been informed, and to respect the purposes for which the data was collected.

In addition, the data controller undertakes to notify the user in the event of rectification or deletion of data, unless this entails a disproportionate number of formalities, costs, and procedures.

If the integrity, confidentiality, or security of the user's personal data is compromised, the data controller undertakes to inform the user by any appropriate means.

SECTION 9: USER'S RIGHTS

In accordance with the regulations concerning the processing of personal data, the user has the following rights:

In order for the data controller to comply with the user's request, the user is required to provide the data controller with his/her/their email address.

The data controller is obliged to reply to the user within a maximum period of 30 days.

9.1 Right to access, correction, and erasure

The user may learn about, update, modify or request the deletion of the data concerning them, via the following procedure:

The user must send an email to the email address privacy@sacstudio.be clearly specifying the subject of his request. For example, the user can title their request as follows: "Request to delete my personal data".

9.2 Right to data portability

The user has the right to request the transfer of his/her/their personal data, held by the site, to another site, in accordance with the following procedure:

The user must make a request for portability of their personal data to the data controller, by sending an email to the following address: privacy@sacstudio.be.

9.3 Right to restrict data processing.

The user has the right to request the limitation or to oppose the processing of his data by the site, without the site being able to refuse, unless it demonstrates the existence of legitimate and compelling reasons.

In order to request the limitation of the processing of his/her/their data or to formulate an objection to the processing of his/her/their data, the user must follow the following procedure: the user must make a request for the limitation of the processing of his/her/their personal data via email address to the data controller.

9.4 Right not to be the subject of a decision based exclusively on automated processing

In compliance with the clauses set out in regulation 2016/679, the user has the right not to be the subject of a decision based exclusively on automated processing if the decision produces legal effects concerning or affecting him/her/them in a significant way or similar.

9.5 Right to determine the future of data after death

The user is reminded that he/she/they can decide what will be done with their collected and processed data in the event of death, in compliance with law n°2016-1321 of October 7, 2016.

9.6 Right to refer matters to the appropriate inspection authority

In the event that the data processing controller decides not to respond to the user's request, and the user wishes to contest this decision, or if he/she/they feel(s) one of the rights detailed above has been breached, the user has the right to request the counsel of the [CNIL](https://www.cnil.fr) (the French National Commission of Information Science and Liberties, <https://www.cnil.fr>) or any appropriate judge.

9.7 Personal data of minors

In accordance with the provisions of Article 8 of European Regulation 2016/679 and the Data Protection Act, only minors aged fifteen or over may consent to the processing of their personal data.

If the user is a minor under fifteen years of age, the consent of a legal representative is required in order to collect and process personal data.

The site administrator reserves the right to check by any means that the user is over fifteen years of age or has obtained the consent of a legal representative before browsing the site or subscribing to the newsletter.

SECTION 10: USE OF COOKIES

Our company uses cookies to improve the user experience on our website and provide personalized and more relevant services.

Cookies are small text files stored on your device when you visit our site.

They allow us to

- **Improve navigation:** cookies facilitate your navigation on our site, by remembering your browsing preferences and allowing you to log in faster.
- **Analyze the use of the site:** we use cookies to collect information about how you use our site. This helps us identify areas for improvement and optimize the structure and content of our website.
- **Customizing content:** thanks to cookies, we can offer you content tailored to your interests, thus improving your user experience.
- **Targeted advertising:** we may use cookies to show you more relevant advertising based on your interests.

The types of cookies used are as follows:

- *Technical cookies:* necessary for the website's operation, they make it possible to use the various features and to secure your connection.
- *Performance and analytics cookies:* these cookies collect anonymous information about visitors' use of the site.
- *Personalization cookies:* used to remember your choices and preferences to improve your experience.
- *Advertising cookies:* used to offer you advertising tailored to your interests.

You have the option to configure your browser to accept or reject cookies, either globally for all sites or on a case-by-case basis.

You can also delete cookies already stored on your device.

It is important to note that disabling cookies may limit your access to certain features of our website and affect your user experience.

For more information on the management and deletion of cookies, we invite you to consult the help function of your browser or visit specialized sites such as the [CNIL](#).

The use of cookies on our site is done in compliance with our privacy policy and the regulations in force.

By continuing to use our site, you consent to the use of cookies in accordance with this policy.

SECTION 11: CONDITIONS FOR AMENDING THE PRIVACY POLICY

This privacy policy can be consulted at any time by the user.

The site publisher reserves the right to modify the policy in order to ensure compliance with the current laws.

Users will be informed by email in the event of substantial changes to our privacy policy.

It is brought to the user's attention that the last update of this privacy policy took place on **29 July 2024**.