



## NUCCO BRAIN STUDIO LIMITED ONLINE SERVICES PRIVACY AND COOKIES POLICY

At Nucco Brain Studio Limited, we are committed to protecting and respecting your privacy.

This Privacy and Cookies Policy explains how we will process the data relating to you that you provide to us (or that we may collect) when you visit our website at [www.nuccobrain.com](http://www.nuccobrain.com) ("**Website**") or if you use any of our Nucco Brain digital application(s) ("**App(s)**") or other Nucco Brain Studio Limited online services.

### INTRODUCTION AND GENERAL TERMS

The Website, as well as any Nucco Brain Studio App(s) that we may operate from time to time, are operated by Nucco Brain Studio Limited (**we, us, our, Nucco Brain Studio Ltd.**), a company incorporated in England & Wales with company number 0203847020 and registered office at 10 Orange Street, Haymarket, London, United Kingdom WC2H7DQ.

Where we decide the purpose and means for the processing of the personal data that you provide via our Website, App(s) or other online services, we are the "data controller". As data controller, we will comply with all applicable data protection laws, including the General Data Protection Regulation 2016/679.

Our Website and App(s) may contain hyperlinks to third party websites or services. These websites and services operate fully independently from us, and we cannot accept any responsibility or liability for the privacy practices of such third parties nor the availability of these external sites or resources. The appearance of such links on our Website, App(s) or other online services is not an endorsement. Should you use any of these third party websites or services, such use is at your own risk and we would advise that you review their respective privacy policies.

If you have any questions or comments about this Privacy and Cookies Policy please contact us at:  
Email: [contact@nuccobrain.com](mailto:contact@nuccobrain.com)

Please read this Privacy and Cookies Policy carefully as it contains important information about the following:

What information Nucco Brain Studio may collect about you

How Nucco Brain Studio will use information we collect about you

Whether Nucco Brain Studio will disclose your details to anyone else

Your choices and rights regarding the personal information we hold about you

This Privacy and Cookies Policy forms a part of and should be read in conjunction with our *Website Terms of Use*.

We will only collect, store, access, transfer and use your information as described in this Privacy and Cookies Policy.

## **INFORMATION WE MAY COLLECT ABOUT YOU**

We collect and process the following information which may include your personal data:

### **Information provided by you when visiting the Website or when using any of our online services**

#### **("Submitted Information")**

We may ask you for, or you may submit, personal and non-personal information to us through the online service whenever you contact us (such as via the email links on our Contact webpage), if you subscribe to our newsletter or use our other online services.

This may include:

your first and last name

email address

phone number

your uploaded CV and/or portfolio content (if applying for jobs to our hr@nuccobrain.com address)

any security issues that you may be experiencing (if you are reporting to our contact@nuccobrain.com address)

your free-text brief description or any other information that you may voluntarily provide

We may obtain sensitive personal data (a/k/a special categories of personal data) about you if you voluntarily supply this when you contact us. For example, if your portfolio submissions contain video or photographic images or free-text that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic or biometric data, health or medical data, or data concerning a person's sex life or sexual orientation. If you volunteer such information, you will be consenting to our processing it for the purpose explained to you when you supply it.

### **How you use our Services ("Cookies and Analytics")**

#### **The Website**

Our Website uses cookies and other tracking mechanisms (such as web beacons, action

tags, Local Shared Objects and flash object storage) to deliver content, to collect log and analytical information about how visitors use the site and to compile statistical reports on Website activity. To find out more about the use of cookies, please visit the All About Cookies website at [www.allaboutcookies.org/](http://www.allaboutcookies.org/).

Our Website also uses website analytics, including Google Analytics and Lead Forensics, to evaluate and improve our Website, personalise your experience and to offer the best, most accessible service possible to all of our visitors.

To find out more about Google Analytics and to learn how to opt out, please visit:

*How Google uses data when you use our partners' sites or apps, or*  
<https://tools.google.com/dlpage/gaoptout/>

To find out more about Lead Forensics and to learn how to opt out, please visit:

<https://www.leadforensics.com/privacy-and-cookies/> (please see "How do we use cookies?")  
<https://www.leadforensics.com/privacy-policy/>

When you visit our Website, the information that we obtain from our use of cookies will not usually contain your personal data. We may obtain your device's IP or MAC address and/or other internet log information (which in some instances may contain personal information), but otherwise the information that we obtain will not usually identify you personally.

In terms of our analytics service providers, these providers may collect the following data, which will almost always be anonymised and aggregated before reporting back to us:

- number of visitors to our Website
- pages visited while at the Website and time spent per page
- page interaction information, such as scrolling, clicks and browsing methods
- websites where visitors have come from and where they go afterwards
- page response times and any download errors
- other technical information relating to end user device, such as IP address or browser plug-in

We process this information to understand how visitors use our Website and to compile statistical reports regarding that activity. This processing is crucial to the running of our online business. This information is not used to develop a personal profile of you.

Please note that, if you choose to disable cookies or similar technologies on your device, you may not be able to make full use of our online services.

### **Information about you collected from your device or Third Parties**

## **(“Content Information”)**

We may collect information about you which you make available to us and which is stored on your device or on your Facebook, Instagram, Twitter or other social media profiles. This might include photographic images (including screenshots), video or other digital content such as posting comments on our social media pages or participating in online competitions.

These third parties may also set cookies on our Website. For example, to display video content we use Facebook, Twitter, Google Plus, Instagram, LinkedIn, and YouTube to enable social networking functionality and sharing, and to monitor how visitors use our Website and any Apps we may operate from time to time. These third party suppliers are responsible for the cookies they set on your device. For further information about their collection and use of your information, please visit the website of the relevant third party.

### **Nucco Brain Studio Apps (that we may operate from time to time)**

When you install, uninstall or update any of our Apps, a unique application number and information about your installation, for example, the type of operating system, may be sent to us. Typically, our Apps are available for iOS and Android.

When we do offer our own App(s), the personal data collected and processed by each App will vary depending on the requirements of the specific App. Most typically, the types of personal data to which our App(s) will have access will include the following data on your device:

#### Content information:

- your mobile phone status and identity,
- photos and media files and audio output,
- contents of your USB / SD card storage,
- camera and microphone functions and audio output, your Wi-Fi connections, and/or your device ID and call information.

#### Location information:

- network-based approximate location, and/or
- precise location data (GPS and network-based).

#### Financial information (in relation to In-App Purchasing *(if applicable)*):

- your payment details (e.g. bank account name, sort code, account number or equivalent credit cardholder information), and
- your preferred billing and shipping postal addresses *(if applicable)*.

## **HOW WE USE INFORMATION WE COLLECT ABOUT YOU**

We will only use information that we collect about you, including any personal data, for the purposes described to you at the time that we collect such information, and for the following purposes:

### **Submitted Information**

to help us identify you when you choose to contact us to

respond to any enquiries that you may send to us

for administration of our Website and the services we offer

to review and respond to job application submissions and related enquiries about working for us

to respond to any security issues reported to us, including emails to [contact@nuccobrain.com](mailto:contact@nuccobrain.com)

to allow you to participate in any interactive features offered by Nucco Brain Studio when you choose to do so

- to monitor any user content you contribute [to our social media webpages or through any of our other interactive online services that Nucco Brain Studio may offer from time to time

to send you information about films, games, VR and our experiential production work as well as other services featured on our Website, App(s) or in any of our online services, including updates about upcoming releases, where you have signed up for one of our newsletters or services via our online services

to notify you about changes to Nucco Brain Studio or the services we provide

### **Cookies and Analytics**

to help us improve our Website and the online services to ensure that content is presented in the most effective manner for you and for your device

to understand how, and how often, users visit and interact with our Website, use our online services

to find out statistical information about the use of the Website

to monitor the technical operation of our Website (e.g. response times, downloading / uploading errors)

to obtain other technical information relating to end user devices to log you into some of our online services and keep you logged in

to remember your preferences (such as your preferred language and configuration)

to administer Nucco Brain Studio online services and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes

to compile statistical reports regarding visitor activity (for example, your IP or MAC address is used to approximate the country from which you access our Website, and we aggregate this information together so we can see from what regions or countries most of the visitors to our Website originate)

This analysis is fundamental to the running of our online and digital business and we therefore undertake such monitoring in the pursuit of our legitimate interests in improving our Website and online services, and to provide a better service and source of information to visitors.

### **Content Information**

to allow you to participate in Nucco Brain’s online interactive features when you choose to do so

to make recommendations about other digital content and services for which Nucco Brain Studio have been a production partner or similar content and services by others (such as via the newsletter or communicated on the Website)

## **WHY WE COLLECT INFORMATION ABOUT YOU**

### **To provide our online services to you**

As applicable, we will use information about you (including Submitted Information, Content Information and Analytics) for delivering our online services to you under the *Website Terms of Use* as well as:

to respond to your enquiries

to contact you about matters requiring your attention

This processing of Submitted Information, Content Information and Analytics is necessary for us to pursue our legitimate interests of providing our core business activities such as the production and/or co-production of films, digital content, games, VR and other experiential media and making these services available to you. This processing enables the Website to function properly so that you have the best experience when visiting the Website.

### **To understand and monitor how users interact and use our online features**

We process information (including Submitted Information, Content Information and Analytics) to understand how visitors interact with each other, to compile Analytics and statistical reports regarding that activity and to protect against and remove objectionable uploaded content.

This processing is necessary for us to pursue our legitimate interests of (i) ensuring that Nucco Brain Studio functions properly so that you and other users have the best experience when sharing your “likes” and comments, reviews and personal information on our social media webpages, and (ii) improving the quality of Nucco Brain’s work product and our services, allowing us to provide an overall better experience to our customers and users of our online services.

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## **Marketing**

We use various forms of marketing to provide you with promotional materials about our Nucco Brain Studio services.

Our Website Marketing: When we showcase digital content and materials that Nucco Brain Studio has produced / co-produced, this may include content that has been produced for our clients' marketing purposes. However, the appearance of such digital content on our Website is solely for the purpose of demonstrating our work and capabilities as a global production partner. We do not actively market via our Website.

Direct Marketing: We might send you marketing emails about products or services featured by Nucco Brain Studio or by our network of trusted third party suppliers which are similar to or related to the products or services that you've purchased In-App or viewed on our Website. We will not process your information for the purposes of marketing or pass your information on to third parties for the purposes of marketing unless you have given your consent or it is otherwise lawful for us to do so. We will provide your details to our third party email marketing and mailing list service provider who helps us to produce and manage our newsletters. We engage The Rocket Science Group (trading as MailChimp) for our email marketing service (<https://mailchimp.com/legal/privacy/>).

## **Purchasing via our online services**

When you use any of our Apps, you may be offered the opportunity to make In-App Purchases via some of our Apps.

If you chose to make an In-App Purchase, our App will redirect you to the relevant third party payment service provider to enable that purchase.

When you opt to make a purchase via our third party service providers (or any third party payment services providers that they use), we will not share any personal information with them, nor will we receive any of the financial information that you provide to them.

## **DATA SHARING**

We will share your information with third parties only in the ways that are described in this Privacy and Cookies Policy, including the third party analytics providers detailed in the sections above. If you would like to find out more about how the third parties listed in this policy use your information, this should be set out in their respective privacy policies.

We keep your information confidential, but may disclose it to any member of our group (which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006), our personnel, suppliers or subcontractors insofar as it is reasonably necessary for the purposes set out in this

Privacy and Cookies Policy. However, this is on the basis that they do not make independent use of the information, and have agreed to safeguard this information.

In addition, we may disclose your information to the extent that we are required to do so by law (which may include to government bodies and law enforcement agencies); in connection with any legal proceedings or prospective legal proceedings; and in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention).

If we are involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email, account message and/or a prominent notice on our website of any change in ownership or uses of this information, as well as any choices you may have regarding this information.

We may also disclose your personal information to third parties in order to enforce or apply the terms of agreements between us, to investigate potential breaches, or to protect the rights, property or safety of Nucci Brain, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

If you send us objectionable content, including contributing or uploading objectionable content on our social media pages, or if you behave in a disruptive manner when using our Website, App(s) or online services, we may process any personal information that you have submitted to us, including in your personal messages, to respond to and stop such behaviour. Where we reasonably believe that you are or may be in breach of the law (i.e. the content you share via our online services amounts to harassment or is defamatory), we may use your personal information to inform relevant third parties about the content, such as your email or internet provider or law enforcement agencies.

## **CONSUMER CONTROL AND OPT-OUT OPTIONS**

If you do not wish to receive promotional or other marketing material from us, then you can opt-out by clicking on the unsubscribe link in our email communications or by changing the 'Edit Profile' setting in the App. Alternatively, you can contact us at [contact@nuccobrain.com](mailto:contact@nuccobrain.com) and let us know that you no longer wish to receive promotional or other marketing material from us.

## **YOUR RIGHTS IN RELATION TO PERSONAL DATA WHICH WE PROCESS RELATING TO YOU**

We aim to comply without undue delay and, in any event, within one month at the latest if you make a request in relation to your data subject rights. You have the following rights over the way that we process personal data relating to you:

- to ask for a copy of data that we are processing about you and/or to have inaccuracies corrected;
- to ask us to restrict, stop processing or to delete your personal data;
- to request a machine readable copy of your personal data, which you can then use with another service provider. Where technically feasible, you may ask us to send this information directly to another provider if you prefer; and



to make a complaint to a data protection regulator. You may contact the Information Commissioner's Office, the UK data protection supervisory authority, at <https://ico.org.uk/concerns/>.

To make a request in relation to any of the aforementioned rights, please email use at [contact@nuccobrain.com](mailto:contact@nuccobrain.com).

If you are unhappy with the way that we are processing your personal data, please let us know. The best way to bring this to our attention is by emailing us at [contact@nuccobrain.com](mailto:contact@nuccobrain.com).

## **DATA RETENTION**

In accordance with data protection laws and good commercial practice, we do not retain data in a form that permits identification of the person(s) to whom it relates for any longer than is necessary. Once the purpose for which information has been collected has been fulfilled, we will either permanently delete your personal information or remove all identifiers within it so that it is no longer personal data. We may use such anonymised data for research and/or business analysis purposes.

We consistently maintain and adhere to our Nucco Brain Studio Information Retention Policy, that we review and update from time to time in accordance with changes to the law and industry codes of best practice. For further information about our retention of data, please direct any enquiries to [contact@nuccobrain.com](mailto:contact@nuccobrain.com).

## **CHILDREN**

We do not knowingly use the Website to solicit data from or market to children under the age of 13.

If a parent or guardian becomes aware that his or her child has provided us with information or may be receiving communications from us or otherwise interacting with us without consent of a parent or guardian, we ask that this be brought to our immediate attention. We will make it our priority to address this situation and delete information relating to a child as soon as practicable. In such an event, please contact us at [contact@nuccobrain.com](mailto:contact@nuccobrain.com).

## **SECURITY**

We will take commercially reasonable, appropriate technical and organisational measures to ensure a level of security appropriate to the risk that could be encountered via the use of our Website and services, taking into account the likelihood and severity those risks might pose to the rights and freedoms of our Website visitors.

In particular, we will take precautions to protect against the accidental or unlawful destruction, loss or alteration, and unauthorised disclosure of or access to the personal information transmitted, stored or otherwise processed by us.

Please be aware that, while we make the security of our Website and your personal information a high priority and devote considerable time and resources to maintain robust IT security, no security system can prevent all security breaches. When you choose to share your personal information with us, you accept the aforesaid and provide your information at your own risk.

## **INTERNATIONAL DATA TRANSFERS**

Nucco Brain Studio Limited's servers are located in the European Union and the information that we collect directly from you will be stored in these servers. We may also transfer your personal data to our affiliates elsewhere in Europe and in the US as well as to our third party service providers, many of whom may be located outside of the EU, operate from multiple locations including non-EU based operations or engage sub-processors located outside the EU.

There are agreements in place to ensure that any international transfers of personal data to our affiliates or third party service providers have appropriate safeguards that meet the requirements of EU data protection laws.

If you would like to find out more about these safeguards or if you have any other queries or comments in relation to this policy, please let us know by emailing us at [contact@nuccobrain.com](mailto:contact@nuccobrain.com).

### **1. CHANGES TO THIS POLICY**

This Privacy and Cookies Policy may be updated from time to time. We will notify you of any changes to this policy by posting the new version of the Privacy and Cookies Policy on our Website. You are advised to consult this Privacy and Cookies Policy webpage regularly for any changes.

### **2. CONTACT US**

Questions, comments and requests in relation to this Privacy and Cookies Policy are welcome and should be addressed to [contact@nuccobrain.com](mailto:contact@nuccobrain.com).

Alternatively, you may address these to our Data Protection Officer at Nucco Brain Studio Limited c/o Shipleys, 10 Orange Street, Haymarket, London WC2H 7DQ.

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