

1. Introduction

Please read this Privacy Notice as it is meant to help you understand what information we collect, why we collect it, and how you can update, manage, export and delete your information.

This Privacy Notice supplements the other notices and is not intended to override them.

We do not and will not sell your data to third parties.

2. Who we are

Antonio Russo Art Company Limited – ‘Antonio Russo’, ‘Stony’.

3. Companies and websites within scope

The following companies and websites are within scope for this privacy notice:

Company	Website
Antonio Russo Art Company Limited	www.arussoart.com

It includes personal data that is collected in person and through our websites, by telephone and through any related social media applications.

4. How to Contact us

If you have questions about this Privacy Notice or the processing of your Personal Data, please contact us at:

Postal address, you can write to:

Privacy Department

Antonio Russo Art Company Limited, 21 High Street, Kings Langley, Hertfordshire, WD4 8AB.

Or via email at info@arussoart.com

5. Personal Data we collect about you

We may collect, use, store and transfer different kinds of Personal Data about you depending on our relationship with you:

Identity data	Includes title, first name, last name, other names, date of birth, age or email address, information in support of proof of identification and proof of address. This may include the processing of official documents such as passports, driving licences, ID Cards.

Contact data	Includes your contact address, billing address, email address or telephone number(s).
Location data	We may collect your location data from your IP address or telephone area codes.
Loyalty Data	We may collect proof of purchase, invoice number, personal and Company billing addresses or trade account numbers.
Transaction data	Includes notes on your interactions and conversations with us and on any orders or agreements that you establish with us. Includes details about payments to and from you and other details of art, products, and services you have purchased from us.
Technical data	Includes IP address, your login information, time zone setting and location, browser plugin types and versions, operating system and platform, and other technology on the devices you use to access our websites.

Profile data	<p>Includes your email and password, Information about your art interests,</p> <ul style="list-style-type: none">· contact details that you provide to us, including name, residential address, date of birth, telephone number, email address, postal address if different to residential.· information about your art interests.· notes on your interactions and conversations with us.· notes on any orders or agreements that you establish with us.
Usage data	<p>Includes information about how you use our websites, the resources you access, pages you visit, the time and date of your visit or an email opened, the time spent on those pages, unique device identifiers, the URL (Uniform Resource Locator) clickstream to, through and from our websites and other diagnostic data.</p>
Marketing and communications data	<p>Includes your preferences in receiving marketing from us and our third parties and your communication preferences and records of our correspondence with you.</p> <p>We may use various technologies, to collect the above information from your interaction with emails we send you. This enables us to focus our marketing, leading to more relevant emails to our subscribers. It also</p>

	<p>helps us to identify subscribers that are not engaged with our marketing emails, enabling us to remove them from our send lists.</p>
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6. How we get your Personal Data

We may use different methods to collect data from and about you through our partner websites, website, website forms, by telephone, and through any related social media applications, including but not limited to social media platforms.

<p>Personal Data provided directly by you</p>	<p>You may give us your Personal Data by placing an order, filling in forms, surveys, questionnaires, or assessments on our websites, by corresponding with us by post, phone, email or otherwise. This includes Personal Data you provide when you:</p> <ul style="list-style-type: none"> · register to use our websites or purchase our art, or to receive general, marketing or commercial information · submitting contact forms · start or complete a survey and/or questionnaire · enter a promotion or survey

	<ul style="list-style-type: none">· give us feedback
Data we collect when you use our Websites	<p>Each time you interact with our websites, we will automatically collect Personal Data, including technical data about your device, your browsing actions and patterns, content and usage data. We collect this data using Cookies, server logs and other similar technologies like pixels, tags and other identifiers in order to remember your preferences, to understand how our Websites are used, and to customise our marketing offerings and to continually improve customer journeys.</p>
Information we receive from third parties	<p>We may receive Personal Data about you from various third parties, such as contact, financial, technical data and device data from parties including:</p> <ul style="list-style-type: none">· analytics providers such as Google Analytics· social Media Advertising networks such as but not limited to WhatsApp, LinkedIn, Twitter, Tiktok Google, Facebook and Instagram.· providers of Fraud prevention tools· address lookups

<p>Information we receive from public sources</p>	<p>Identity and contact data from publicly available sources such as the UK Companies House and the electoral register inside the UK. Publicly available data sources are used for postcode and address data for delivery, as well in the prevention of fraud.</p>
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7. How we use your Personal Data

We need your Personal Data to conduct our business and provide you with our art products and services. Most commonly we will use your Personal Data in the following circumstances:

- Where you have consented before the processing.
- Where we need to perform a contract, we are about to enter or have entered with you.
- Where we need to comply with a legal or regulatory obligation.

8. UK GDPR/EU GDPR Lawful Basis Table

The table below describes the ways we plan to use your Personal Data, and which Lawful Basis we rely on to do so. We have also identified what our legitimate interests are where appropriate.

For more information on the Lawful Basis, we use to process your data under the UK GDPR and EU GDPR, see our Lawful Basis table below or contact us.

Lawful Basis Table

LAWFUL BASIS	PURPOSE EXAMPLES
<p><u>Contractual</u></p> <p>We use your Personal Data on the basis that it is necessary for us to provide our services and products to you.</p> <p>When you sell or purchase a product or service, you are entering into a contract with us.</p>	<p>Onboarding - when you register as a new client or supplier.</p> <ul style="list-style-type: none"> · we may use your personal, contact, technical, profile and marketing and communication data. <p>Delivery - in order to be able to deliver our art products and services or receive products and services in physical or digital form.</p> <p>To provide you with information, art products or services that you requested from us and to notify you about changes to our products and/or services.</p> <p>The fulfilment and distribution of physical and digital art to our users.</p> <ul style="list-style-type: none"> · we use your personal, contact, technical, profile and marketing and communication data to deliver our art and/or related services to you. <p>Account administration - when we administer accounts, take, or receive payment, deal with any transaction, respond to queries, refund requests and complaints.</p>

	<p>Relationship management - to manage our relationship with you, which may include:</p> <ul style="list-style-type: none"> ● notifying you of changes to our terms or Privacy Notice; ● notifying you of changes to, any product or service processing, delivering your art products and/or services and incentives. ● processing orders ● asking you to leave a review or take a survey. <p>We use Identity Data, Contact Data, Location Data, Transaction Data, Profile Data, Marketing and Communications Data to manage our relationship with you.</p> <p>Communication - to be able to contact you regarding updates or informative communications related to our events, updates and new releases that are likely to be relevant and/or of interest to you.</p> <p>Handling the information, you submit to us enables us to respond effectively. We may also keep a record of these queries to inform any future communications between us and to demonstrate how we communicated with you throughout our contractual relationship.</p>
<p><u>Legitimate interest</u></p> <p>Our legitimate business interests do not automatically override your interests – we will not use your Personal Data for activities where our interests are overridden by the</p>	<p>Managing our business - we hold Personal Data for our own legitimate business interest. This relates to us managing our business to enable us securely to provide our service/products:</p>

impact on you unless we have your consent or are otherwise required or permitted to by law.

- when we respond to your queries and complaints, where you are not a user, client or supplier, or a potential client, user or supplier.
- when we monitor trends so we can improve our services websites.
- in the context of a business reorganisation or group restructuring exercise.

We may use your use Identity Data, Contact Data, Transaction Data, Profile Data, Marketing and Communications Data to help us to manage our business.

It is necessary to process this personal data for our legitimate interests for running our business, provision of administration, network security, to prevent fraud, and in the context of a business reorganisation or group restructuring exercise.

Provide and maintain websites - It is in our legitimate interests to process personal data for our legitimate interests for running our business, provision of administration and IT services, network security and

- to prevent fraud.
- to provide and maintain our websites, including to monitor the usage of these, troubleshooting, data analysis and system testing necessary for our legitimate interests (for running our business, provision of administration and IT services, network security) and to limit our business, cyber and legal risk.

- to ensure that our website content is presented in the most effective manner to clients, which is in our legitimate interest to keep users and clients engaged in our website and services to help towards the growth of our business.

The personal data we use to provide and maintain websites includes Identity Data, Contact Data, Location Data, Technical Data, Transaction Data, Profile Data, Usage Data, Loyalty Data, Marketing and communications data, and Aggregated data.

Recommendations and marketing - It is in our legitimate interests to use marketing to grow our business and ensure commercial viability by marketing to and we use personal data to:

- to measure and analyse the effectiveness of the advertising we serve you.

- to ensure that our marketing is tailored to your interests and to keep our records up to date and to provide you with marketing as allowed by law.

- to make suggestions and recommendations to you about art, artists or events that may be of interest to you and necessary for our legitimate interests (to develop our art products/services and grow our business).

We use personal data from existing clients for these purposes and this data includes Identity Data, Contact Data, Location Data, Technical Data,

Transaction Data, Profile Data, Usage Data, Loyalty Data, Marketing and Communications Data.

Security - it is in our legitimate interests to process personal data securely to maintain network security and:

- to prevent fraud when users are transacting on our website,
- to ensure our websites and systems are secure. to prevent financial and reputational loss to our business.

Reviews - when we capture client reviews, for example when you buy art from us, we may follow it up with an enquiry about your experience of the service to help us gauge customer satisfaction.

- it is in our legitimate interests to ensure our survival in a competitive market by ensuring that our services and art are market appropriate and delivered satisfactorily to our clients and users.

Valuations – we use your transactional data in order to provide any future valuations required for insurance purposes.

We use Identity Data, Contact Data, Transaction, Marketing and Communications Data, to be able to properly communicate and respond to reviews.

Research and analysis - for statistical analysis, so that we can monitor and improve services and websites or develop new ones and we may also aggregate personal data for these purposes.

- it is necessary to us and in our legitimate interests (to study how customers use our websites, to develop them, to grow our business and to inform our marketing strategy).

We use Identity Data, Contact Data, Location Data, Loyalty Data, Technical Data, Payment Data, Transaction Data, Profile Data, Candidate Data, Marketing and Communications Data, and Usage Data for research and statistical analysis the type of personal data we use depends on the nature of the research and analysis.

Data analytics - we use data analytics to improve our Websites, products/services, marketing, customer relationships and experiences.

- data Analytics are necessary to our business and in our legitimate interests to define types of customers for our art products and services, to study how customers use our Websites and services so we are able to develop our products and services and keep our website updated and relevant. We need this information to develop our business and to inform our marketing strategy to ensure the growth of our business.

We may use Location Data, Technical Data, Payment Data, Transaction Data, Profile Data, and Usage Data for data analytics.

	<p>Rights and claims - it is in our legitimate interests to use personal data, where it is necessary,</p> <ul style="list-style-type: none"> · to enforce or apply our website terms of use, our policy terms and conditions, or other contracts. · to exercise our rights, to defend ourselves from claims and to keep to laws and regulations that apply to us and the third parties we work with. <p>Necessary for our legitimate interests (for running our business, provision of administration services, network security, to prevent fraud.</p> <p>We may use Identity Data, Contact Data, Location Data, Loyalty Data, Technical Data, Payment Data, Transaction Data, Profile Data, Marketing and Communications Data, Aggregated Data, Usage Data for these purposes.</p>
<p>Legal obligations</p> <p>We may use your Personal Data to comply with laws (for example, if we are required to co-operate with a police investigation after a court order orders us to).</p>	<p>Legal requirement - the processing is necessary for compliance with our legal obligations, such as but not limited to security requirements and accounting requirements.</p> <ul style="list-style-type: none"> · to comply with applicable law, for example in response to a request from a court or regulatory body, where such request is made in accordance with the law.

	<p>We may use Identity Data, Contact Data, Location Data, Loyalty Data, Technical Data, Payment Data, Transaction Data, Profile Data, Marketing and Communications Data, Aggregated Data, Usage Data for these purposes.</p> <p>Data subject rights - verifying your identity when you exercise your data subject rights.</p> <ul style="list-style-type: none"> · fulfilling data subject rights requests. <p>We may use Identity Data, Contact Data, Location Data, Loyalty Data, Technical Data, Payment Data, Transaction Data, Profile Data, Marketing and Communications Data, Aggregated Data, Usage Data for these purposes, dependent on the Data Subject request itself.</p> <p>Criminal activity - to detect fraudulent or criminal activity, we may share information with forces such as the police and the national crime agency.</p> <p>We may use Identity Data, Contact Data, Location Data, Loyalty Data, Technical Data, Payment Data, Transaction Data, Profile Data, Marketing and Communications Data, Usage Data for these purposes.</p>
<p>Consent</p> <p>We may have to get your consent to use your Personal Data, such as when we collect and use Special Category</p>	<p>Marketing -</p>

Personal Data about you or when we have want to email you for marketing purposes etc.

We will get your consent before sending third-party direct marketing communications to you via email or text message or before processing any Personal Data relating to your health. You have the right to withdraw consent to marketing at any time by contacting us.

Wherever consent is the only reason for using your Personal Data, you have the right to change your mind and/or withdraw your consent at any time.

- for marketing our art and services like email marketing newsletters generally.
- to deliver content and advertisements to you.
- to measure and analyse the effectiveness of the advertising we serve you.
- to monitor trends so we can improve our websites,
- to facilitate visitors' use of the Websites, we may collect IP addresses and store Cookies on visitors' devices.
- Sending third-party direct marketing communications to you via email, letters or phone calls.

We may use Identity Data, Contact Data, Location Data, Technical Data, Marketing and Communications Data for these purposes.

Location - when you use our website, you may allow us to obtain your precise location from your device. We use this information to deliver personalised content and for analytics.

We may use Location Data, Technical Data, Payment Data, and Usage Data for these purposes.

9. Using your Personal Data for other reasons

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the Lawful Basis that allows us to do so.

10. Sharing your Personal Data with others

We will, in some circumstances and where the law allows, share your data with third parties, we require all third parties to respect the security of your Personal Data and to treat it in accordance with the law.

We do not allow our third-party service providers to use your Personal Data for their own purposes. We only permit them to process your Personal Data for specified purposes and in accordance with our instructions.

We may share your personal information with the following organisations that help us manage our business and deliver our products, applications, or services, or where we are legally obliged to share information, including with:

- HMRC as our Anti Money Laundering supervisor and with law enforcement officials or other authorities as required by law.
- third parties we use to help us run our business such as our bank, marketing agencies website hosts, IT support system providers, contractors and our telephony system provider.
- third-party service provider to assist us with client insight analytics and track page views such as Google Analytics we may send the 3rd party Page Information (URL, Title), Browser Information (Browser name, Viewport or Viewing pane, Screen resolution, Java enabled, Flash version), User Information (Location - IP address, Language).
- third-party platforms to manage and deliver customer relationship management.
- professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations;
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations; or

- we may share your personal information with our, third party service provider who use credit reference agencies, electoral role and fraud prevention agencies to help prevent money laundering and financial crime if required to by law.
- we may share personal information with our interest free credit providers, couriers and/or our artwork insurance providers and only then if you have opted to use these services.

11. Marketing and advertising

We may use your information to provide you with details about art works, new launches, events and services.

Where we are legally required to obtain your consent to provide you with certain marketing materials, we will only provide you with such marketing materials where we have obtained such consent from you.

12. Promotional Events – Photography and Filming

At times we may capture photographic images or record video footage at promotional events.

By confirming your attendance at any events, you are consenting to your image being captured.

These images and footage and maybe published through any of the following channels:

- press and media (including newspapers, magazines, websites and social media).
- on our websites.
- on our social media feeds including Facebook, YouTube, Instagram and TikTok.
- in printed publicity literature such as leaflets, brochures, posters or other display materials.

Consent for Children under the age of 18 will require a consent from an appropriate guardian.

Any data captured will be stored securely and kept in line with our data retention policy.

You can opt out of us using your personal information by contacting us by emailing info@arussoart.com

14. Third-party websites, plugins and services links to other websites

You should be aware that information about your use of the websites (including your IP address) may be retained by your ISP (Internet Service Provider), the hosting provider and any third party that has access to your Internet traffic.

Our websites may contain links to third-party websites and plugins, for instance a social media login plugin. If you choose to use these websites, plugins, or services, you may disclose your information to those third parties.

We are not responsible for the content or practices of those websites, plugins, or services. The collection use and disclosure of your Personal Data will be subject to the privacy notices of these third parties and not this Privacy Notice.

15. Use by children

We do not target children, and our websites and art are not intended to attract children.

If a parent or guardian notifies us, or it is discovered by other means, that a minor under the age of 18 has provided their Personal Data to us, we will promptly delete the minor's Personal Data that is in our possession.

16. Cookies

We use Cookies and similar technologies like pixels, tags, and other identifiers to remember your preferences, to understand how our Websites are used, and to customise our marketing offerings.

17. How long we keep your personal data

We will keep your Personal Data in line with our data retention policy for no longer than is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.

18. How we keep your Personal Data safe

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used, or accessed in an unauthorised way, altered or disclosed. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so. In addition, we limit access to your Personal Data to those employees, agents, contractors and other third parties that have a business need to know. They will only process your Personal Data on our instructions, and they are subject to a duty of confidentiality.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your Personal Data, we do not have any control over what happens between your device and the boundary of our information infrastructure.

19. Your rights as a data subject

As a data subject whose personal information we hold, you have certain rights. If you wish to exercise any of these rights, please info@arussoart.com.

Table of your rights

<i>YOUR RIGHT</i>	<i>DETAILS</i>
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Right to be informed	<p>We have a legal obligation to provide you with concise, transparent, intelligible, and easily accessible information about your personal information and our use of it. We have written this Privacy Notice to do just that, but if you have any questions or require more specific information, you can contact us.</p>
Right of access	<p>You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions, which means you may not always receive all the information.</p>
Right to rectification	<p>You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies.</p>
Right to erasure	<p>You have the right to ask us to erase your personal information in certain circumstances. We have the right to refuse to comply with a request for erasure if we are processing the Personal Data for one of the following reasons:</p> <ul style="list-style-type: none">· to comply with a legal obligation.· to perform a task in the public interest or exercise official authority.· for archiving purposes in the public interest, scientific research, historical research or statistical purposes.

	<ul style="list-style-type: none"> · for the exercise or defence of legal claims.
<p>Right to restriction of processing</p>	<p>You may ask us to stop processing your Personal Data. We will still hold the data but will not process it any further. This right is an alternative to the right to erasure. If one of the following conditions applies, you may exercise the right to restrict processing:</p> <ul style="list-style-type: none"> · the accuracy of the Personal Data is contested. · processing of the Personal Data is unlawful. · we no longer need the Personal Data for processing, but the Personal Data is required for part of a legal process.

20. How to exercise your rights

If you would like to exercise any of those rights, please email info@arussoart.com

You can call or write to us — see '4.

When contacting us please:

- provide enough information to identify yourself (e.g., your full name, address and customer or matter reference number) and any additional identity information we may reasonably request from you, and

- let us know which right(s) you want to exercise and the information to which your request relates

We have one month to respond to you.

21. How you can complain to or about us

We hope that we can resolve any query or concern you raise about our use of your information. Please contact us first and title your email “Complaint”. All complaints will be treated in a confidential manner, and we will try our best to deal with your concerns. We are committed to manage complaints promptly, effectively and fairly.

Should you feel unsatisfied with our handling of your data, or about any complaint that you have made to us about our handling of your data, you are entitled to escalate your complaint to a supervisory authority within the EU.

22. Changes to privacy policy

We may change this privacy notice from time to time. When we do, we will inform you by posting the updated versions on our websites and summarising key amendments.