

Privacy Policy

In order for us to operate our business and provide our services to You, it is sometimes necessary for us to collect or process information about You. In general terms, this information will take one or more of the following forms:

- Information that you provide to us directly, such as in the situation where you complete an online form or send us a message via our website or e-mails;
- Information that is automatically sent to us by Your computer's internet browser when you visit our website, such as your computer's technical address (or 'IP address') or information about which particular internet browser you are using and so on;
- Information about how you use our website or our services, such as which pages you visit, how frequently you visit the site and so forth.
- This privacy policy sets out the detail of what information we collect, as well as how that data is used and protected.

Our commitment to data privacy

We are fully committed to maintaining the privacy of any information ('personal data') that you provide to us. Furthermore, we commit to ensuring that such data is held securely, used appropriately and only retained for as long as is necessary.

Our systems and services are designed with privacy in mind, and we operate a 'data minimisation' principle wherever possible – that is to say that we will only ever ask you for the minimum amount of information required to provide our services efficiently; we have no desire to retain (and therefore maintain) any more information than is necessary. We aspire to comply to the fullest extent possible with applicable data protection regulations, in particular the European Union's General Data Protection Regulation ('GDPR') and ePrivacy Directive, where applicable.

Who we are

In terms of your use of this website, We, LD Studio, act in the capacity of Data Controller, and should you have any questions or concerns about the data we hold about you, we can be contacted using the information below:

Data Controller: LD Studio

Correspondence address: Mirgorodska 4, Belgrade, Serbia

Email correspondence: office@ldstudio.design

Definition of 'personal data'

When we refer to 'personal data' we mean any information that allows us to identify you personally. Obvious examples include your name, email address, postal address etc. We will always seek to gain your explicit consent to providing this information before we collect it from you, although this may not be the only legal basis on which we collect the data.

Other types of information, such as your computer's 'IP' address or broad geographical location do not, generally, allow us to identify you directly. However, because in their current form, European data privacy regulations are somewhat vague in this regard, we will cover the use of such data here also.

Who we share data with

We operate on a strict 'need to know' basis for all data that we work with, and that is particularly true for any personal data. The only people/organisations that are granted access to personal data are:

- Employees of LD Studio who provide design and/or support services;
- Our web hosting technology suppliers who provide the physical server infrastructures that our website(s) operate on. We ensure that all servers in use reside physically either in the Serbia or EU, and that no customer data is transferred to data centres outside this region.

We have signed Data Privacy Agreements with all of the 3rd party technology suppliers above which detail our respective responsibilities for data security.

How your data is protected

We take the security of all personal data very seriously, and that data is protected in a number of ways:

- Access control: access to personal data is strictly limited in line with our policy detailed in the 'who we share data with section' on this page. Access is controlled by individual user accounts, where a strong password policy is enforced
- Dedicated security software: We operate dedicated security scanning and access control software on all of our websites. This software is responsible for limiting login attempts to our site, blocking potentially malicious attempts to access our services, and regularly performing full file system scans.
- This website is also secured with SSL encryption, which means that all traffic to and from our servers is encrypted. This applies to our own administrative access to the website as well as that of users of our services.

Additionally, we ensure that our own dedicated secure Virtual Private Network (VPN) is used when we access the site from anywhere on a public wifi network.

Selection of third party service providers:

We use a very limited number of third party service providers, but some are essential for the provision of physical hosting environments and cloud services. One of the core factors in the selection of such providers is their ability to provide secure systems and processes. We have written Data Processing Agreements with each of our core service providers that sets out the requirements for data security.

Access to your personal data

In the situation where you have directly provided personal information to us (such as by completing an online form or contacting us for further information), you have a number of rights regarding the personal data that we hold:

- You have the right to obtain from us confirmation about whether any such data is being held;
- You have the right to require that we provide you with whatever data we are holding/processing about you, including the right for that data to be transferred to another data controller;
- Even if you have consented to Us processing your personal data, you have the right to withdraw that permission at any time;
- You have the right to require us to rectify any incomplete or incorrect information held about you;
- You have the right to require us to erase the data held about you (the ‘right to be forgotten’);

In the situation where we collect personal data automatically (such as from your internet browser or via internet Cookies or other similar technologies):

- You have the right to object to the legal basis upon which we are collecting this data, and We have an obligation to consider and respond to that objection;
- You have the right to request the prevention of further processing of your data while your objection is considered;

In most circumstances, you can exercise these rights without paying a fee to us.

Types of data collected

Website contact forms

When you complete one of the contact forms on our website, we will ask you for a number of pieces of personal information, such as your name, email address and other contact details. This is obviously required for us to respond to your request.

If you do not use or submit an online form on the website, no data will be collected in that regard.



Legal Basis:

Consent (GDPR Art 6(1)(a)): Generally, we will ask for your explicit permission to process this data before you are able to submit the contact form. We will also give you a link to our Privacy Policy (this document) that you may review before submitting your details.

Intent to contract (GDPR Art 6(1)(b)): Additionally, the information that you provide to us here is necessary for us to fulfil your request prior to entering into a contract.

Types of processing

We will store the information you provide to us in our website database, and/or in our self-managed Customer Relationship Management system. Such storage allows us to efficiently access your data and respond to your requests;

For the purpose of maintaining the integrity of our systems, we may also store this data in system backups, which are encrypted and held securely by our technology partners;

We may use this information to contact you about other of our own services that we believe may be of genuine interest to you;

We will **NOT** use this data for any further purpose without your express further consent;

We will **NEVER** sell your information to any 3rd party.

Data minimisation:

We will only ask you for the minimum amount of information required to appropriately fulfil your request. This will usually be your name, one or more contact details, and any specific information about your request.

Retention

If we do not enter into a further contract or agreement with you, we will retain this data for a maximum of 12 months. If you choose to enter into a service agreement with us, we will retain the data for the length of our ongoing agreement plus a maximum of 12 months.

Account logins

For some website functionality, we will need to create for you a user account that allows you to login to the site to ensure that only authorised individuals can access your data and that functionality. Examples include when you make an online purchase via the site, or when you have a role in administering or contributing towards the website content (such as a blog author). The purpose of these user accounts is to protect your personal data behind login security, and to protect the integrity of our site and the servers that run it.

Data collected will generally involve your name and email address (which doubles as username) as a minimum, but may include your postal address if it is required for online purchases.

If you do not register for an online account then no such data will be collected in this regard.

Legal Basis:

Protecting your interests (GDPR Art 6(1)(d)): Website accounts are strictly necessary for the purpose of providing the functionality that you have requested, and we consider that protecting the integrity and security of your data is protecting your interests under the GDPR.

Our Legitimate interest (GDPR Art 6(1)(f)): The protection of your personal data is a vital part of the protection that we apply to your personal data, and to the services that we offer. We consider that it is in our legitimate interest to process your account data to this end.

Types of processing

We will store the information you provide to us in our website database, as this data is strictly necessary for the website account to function when you visit the site;

For the purpose of maintaining the integrity of our systems, we may also store this data in system backups, which are encrypted and held securely by our technology partners;

We will **NOT** use this data for any further purpose without your express further consent;

We will **NEVER** sell your information to any 3rd party.

Data minimisation:

We will only ask you for the minimum amount of information required to appropriately fulfil your request. We will only use mandatory/required fields where it is necessary to do so.

Retention

We will retain this data for as long as you maintain an active account, plus a maximum of 12 months.

Technical data (such as 'IP address')

When you visit our website, our systems will log a record of your visit in our server logs, and typically this record will include the technical 'IP' address that is associated with your device and the browser type and version that you are using.

Such server logs are extremely common practice, and are used to monitor technical resources, monitor high-level server activity, and importantly to detect and prevent malicious or fraudulent activity on our systems. This data can also be used, if required, to diagnose reports of technical issues. The storage of IP addresses, allow us to identify patterns of behaviour (such as repeated malicious attempts to access a system).

IP addresses, in and of themselves, do not allow us in any way to identify you as an individual, especially given that it is very common for IP addresses to be dynamically allocated by your service provider, and will therefore often routinely change.

Furthermore, we do not and will not use the content of server access logs to attempt to determine an identifiable individual. We therefore do not consider that data held within server logs falls within the scope of 'personal data', and accordingly we do not seek your consent to collect it.

Legal Basis

In the event that such anonymous data is considered to fall within the scope of the applicable data protection regulations, the legal basis for processing such data is:

Our Legitimate interest (GDPR Art 6(1)(f)): The integrity, security and performance of our systems and infrastructure is a vital part of the services that we offer. We consider that it is in our legitimate interest to maintain and protect our systems to this end.

Types of processing

We will store the information you provide to us in our website server logs

For the purpose of maintaining the integrity of our systems, we may also store this data in infrastructure backups

We will **NOT** use this data to attempt to identify an individual person

Retention

Server logs are automatically rotated on our systems, and are retained for a maximum of 12 months following the closure of the relevant log file.

Cookies and 'similar technologies'

We have included cookies, web beacons and similar technologies into one section because they all perform similar functions even if, from a technical perspective, they work slightly differently.

All of these technologies allow us to better understand how users are using our website and other related services. They can also be an essential part of providing certain online functionality. They are all essentially small data files placed on your computer (or other device) that allow us to tell when you have visited a particular page, or performed a particular action (such as clicking a particular button) on our website.

These technologies are used by most websites as they provide useful insight into how the services are being used, as well as improving speed, performance and security, and enabling us to improve our personalisation of your experience.

Cookies

These are small text files placed in the memory of your browser or device when you visit a website. Cookies allow a website to recognize a particular device or browser. There are several types of cookies:

- Session cookies expire at the end of your browser session and allow us to link your actions during that particular browser session.
- Persistent cookies are stored on your device in between browser sessions, allowing us to remember your preferences or actions across multiple sites.

- First-party cookies are set by the site you are visiting.
- Third-party cookies are set by a third party site separate from the site you are visiting.

There are a number of ways that you can influence how cookies are used on your particular device. Most commercial browsers (such as Chrome, Safari, Edge, Internet Explorer, Firefox etc) allow you to set preferences for whether to allow or block website cookies.

They will also provide tools that allow you to remove any cookies that have already been set. Using the 'Help' functionality of your browser, or an internet search, will help you to understand how to use these features for your particular browser.

Cookie Control Additionally, we have incorporated specific cookie functionality on our website that allows you to easily indicate when you first visit the site whether or not you are happy for cookies to be set on your device.

Perhaps ironically, for our site to remember your preference for whether to allow cookies or not, it is necessary for us to set cookies for this specific purpose.

When you first visit our site, a Cookie Control box will be displayed allowing you to choose whether to allow cookies or not. Only Essential cookies and those that do not contain/track any personal data will be set when you first visit our site.

By continuing to use our site beyond this cookie information (by scrolling the page, clicking links etc) then you are consenting to the use of cookies, and we will set other non-essential cookies as described in this policy.

You can change your choice at any time by clicking on the persistent cookie icon at the bottom of the screen.

Web beacons

– Small graphic images (also known as “pixel tags” or “clear GIFs”) that may be included on our sites and services that typically work in conjunction with cookies to identify our users and user behaviour.

More detail about our use of cookies

Website Analytics

We use Google Analytics to better understand what people look at on our website.

When people visit our site, information about their visit (such as which pages they look at, how long they spend on the site and so on) is sent in an anonymous form to Google Analytics (which is controlled by Google)

The data contains information about anyone who uses our website from your computer, and there is no way to identify individuals from the data.

We ensure that no personally identifiable information is ever contained within the data sent to our analytics providers, and we also perform a process which partially obscures your IP address information.

As analytics information is not personal data, we do not specifically ask for your prior consent.

Other Google Services

In addition to Google Analytics, we use a number of industry-standard Google services to provide particular pieces of website content. These include:

- Google Fonts: We may use one or more of Google's web fonts to ensure that our website content is displayed in a clear and consistent fashion across all of the different types of devices and browsers.
- Google Maps: We may use the Google's mapping services to provide dynamic geographic maps on our website
- Google Recaptcha: We may use Google's Recaptcha service (which provides the 'I Am Not A Robot' functionality) on our web contact forms. This is a security measure to prevent the abuse of our contact forms by automated programs.

Each of these services involve our website making a connection to one or more Google servers, and may result in Google placing cookies on your device.

Google Fonts & Maps

By using Google Fonts, we make a connection to the Google Fonts API and, unless your browser has already stored a copy of the font in use (by virtue of visiting another website that uses it), your browser will download a copy of that font. This all happens in near real time, and means that our website content will be displayed on your device in the way we had intended it, regardless of whether the particular font is installed on your device.

The Google Fonts API connection is unauthenticated, meaning that it will work regardless of whether you are logged into Google. It does not rely on cookies being sent to Google. Google may capture your device's IP address as part of this process, and uses this data only in aggregate form to understand the popularity of individual fonts. More detail can be found on the Google Fonts FAQ page.

We only use Google Maps functionality to show dynamic maps on our website, and not in any way to detect or track your location.

Lawful Basis

Under the Google Terms of Service we ask for your consent to process your personal data in this way (GDPR Article6(1)(a)) as part of this privacy policy. However, please note that this is not the only lawful basis on which we process this data

We consider that it is in our Legitimate Interest to process data in this way under GDPR Article 6(1)(f). The use of Google Fonts and Maps is a means of ensuring a clear and consistent display of our web content, in a way that improves user experience. The data collected by Google is extremely limited and we consider that it has negligible impact on individuals' data privacy.

Google Recaptcha

We use the Google Recaptcha ('I Am Not A Robot') functionality to prevent automated programs (or 'bots') abusing our contact forms with spam messages or other malicious activity.

Before submitting a contact form to us, you will be asked to check the 'I Am Not A Robot' checkbox. In the background, Google will perform a number of checks that are aimed at understanding the likelihood of your being a 'real' person, as opposed to an automated system. If it is in any doubt, it will ask you to perform one or more activities (such as identifying particular items within an image) that only a 'real' person can do.

The exact mechanism for this is a closely guarded Google secret, but it does involve Google checking your activity on our (and other) websites and the presence/absence of any Google cookies in place on your device.

Lawful Basis

Under the Google Terms of Service we ask for your consent to process your personal data in this way (GDPR Article6(1)(a)) as part of this privacy policy. However, please note that this is not the only lawful basis on which we process this data

We consider that it is in our Legitimate Interest to use Recaptcha in this way under GDPR Article 6(1)(f). It enables us to maintain the security and integrity of our systems by minimising spam, and to provide an efficient service to 'real' users. On balance, we consider that it has a negligible impact on individuals' privacy.

Facebook

Like the vast majority of commercial websites, we use social media cookies from Facebook on our site. The cookies are placed by Facebook, and we use them to understand the effectiveness of social media campaigns that we operate.

If you are not logged into Facebook when you view our site, then it is not possible for any personal information about your visit to be collected, and therefore we do not specifically ask for your prior consent.

If you are logged into Facebook when you view our site, then Facebook will know when you visit us. We do not have any access to the detail of that personal data, as you have consented to share it with Facebook, not us. We just get to see anonymised data about the numbers of people who have responded to our advertising or other social media activity.

You can learn about Facebook's privacy policy here. <https://www.facebook.com/privacy/explanation>

Facebook, may use cookies, web beacons, and other storage technologies to collect or receive information from your websites and elsewhere on the internet and use that information to provide measurement services and target ads. You can learn about Facebook's privacy policy [here](#).

There are a number of ways of controlling the ads that you see based upon your activity on Facebook. The following resources may help to understand those choices:

You can opt-out of Facebook tracking on the LD Studio website using the Cookie Control functionality on this site. You can edit your cookie preferences at any time using the Cookie Control icon in the bottom right hand corner of your screen, and disabling 'marketing' cookies.

How to opt-out of Facebook interest-based advertising on your browser or mobile device:
<https://www.facebook.com/help/568137493302217>

About Ads: <http://www.aboutads.info/choices>

Your Online Choices: <http://www.youronlinechoices.eu/>

You can always use your browser's 'private' or 'incognito' mode to browse websites anonymously.

If you disable marketing cookies on this site, it does not mean that you will not see our ads, it just means that they will not be personalised based on your Facebook activity.

Our uses of such technologies fall into the following general categories:

Essential. We may use cookies, web beacons, or other similar technologies that are necessary to the operation of our sites, services, applications, and tools. This includes technologies that allow you access to our sites, services, applications, and tools; that are required to identify irregular site behaviour, prevent fraudulent activity and improve security; or that allow you to make use of our functions such as shopping-carts, saved search, or similar functions;

Performance Related. We may use cookies, web beacons, or other similar technologies to assess the performance of our websites, applications, services, and tools, including as part of our analytic practices to help us understand how our visitors use our websites, determine if you have interacted with our messaging, determine whether you have viewed an item or link, or to improve our website content, applications, services, or tools;

Functionality Related. We may use cookies, web beacons, or other similar technologies that allow us to offer you enhanced functionality when accessing or using our sites, services, applications, or tools. This may include identifying you when you sign into our sites or keeping track of your specified preferences, interests, or past items viewed so that we may enhance the presentation of content on our sites;

Marketing Related. We may use first-party or third-party cookies and web beacons to deliver content, including ads relevant to your interests, on our sites or on third party sites. This includes using technologies to understand the usefulness to you of the advertisements and content that have been delivered to you, such as whether you have clicked on an advertisement.

The cookies currently in use on this site are as follows:

Cookie Purpose

_ga, _gat, _gid Performance Related – Analytics cookies set by Google Analytics

wordfence_verifiedHuman, wfvt_-[random number] Essential – these are set by our security software, Wordfence, enabling that system to distinguish visits from different users and user types, and helps us to identify and prevent fraud and attempted unauthorised access to our systems.

marketing, rvMarketing Essential – these are set by our Cookie Control system for the purpose of remembering whether you have consented to the use of non-essential cookies. Without them, we would be unable to respect the cookie consent choices that you have made. We know it's ironic to use cookies to track whether you're happy with the use of cookies, but it is essential to help us meet our data privacy responsibilities.

frMarketing Related – this cookie is set by Facebook and allows us to undertake interest-based advertising, and understand the performance of our social media marketing or other Facebook activity.

Changes to Privacy Policy

This privacy policy may change from time to time in line with legislation or industry developments. We will not explicitly inform our clients or website users of these changes. Instead, we recommend that you check this page occasionally for any policy changes.

If you have any questions/comments about privacy, please contact us.