

Privacy Policy

Last amended and valid from: 01 June 2025

This privacy statement of Framed by Ken describes to what extent and why personal data might be collected, stored, and/or shared when you use Framed by Ken's products and/or services, including when you:

- Visit Framed by Ken's website(s): www.framedbyken.com and shop.framedbyken.com; and/or
- Do business with Framed by Ken in other relevant ways, such as when purchasing products and/or services.

Framed by Ken considers the lawful and proper processing of personal data to be of major importance. This privacy statement explains how Framed by Ken handles the processing of personal data within the scope of its provision of services. Framed by Ken is not responsible for the privacy and/or cookie statements of other organisations or companies (linked) on the Framed by Ken's website(s).

By reading this privacy statement, you will have a better understanding of your rights. If you are uncomfortable about Framed by Ken's use of your personal data, or have any questions or comments, please feel free to contact us at privacy@framedbyken.com, or via the contact form on Framed by Ken's website.

The Dutch Data Protection Authority (AP) is the Dutch data protection regulator. For more information, please refer to the AP's website.

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1. Personal data

Framed by Ken shall at all times act in accordance with applicable laws and regulations, including the General Data Protection Regulation (GDPR).

All data processed by Framed by Ken as part of its business operations are treated with care and are secured. To this end, Framed by Ken takes appropriate organisational and technical measures.

Framed by Ken retains any personal data collected no longer than strictly necessary and only for the purposes for which the personal data were collected. These purposes are indicated by type of personal data.

1.1. Processing of personal data

The overview below shows which personal data (may) be processed of those who use Framed by Ken's products and/or services. These data have either been provided by you yourself or can be (indirectly) deduced from public data, including social media.

- First and last name
- Contact details such as name and address, e-mail address and/or telephone number
- IP address and location data
- Details of the user's activities on the Framed by Ken' website

1.2. Purpose and basis of processing personal data

Personal data may only be processed for a legitimate purpose, known as purpose limitation. The GDPR stipulates six legal bases for processing personal data:

1. **Consent:** you have consented to the processing after receiving all relevant information. All rights under the GDPR apply, except the right to object. For the avoidance of doubt, you have the right to withdraw your consent at any time without providing any reasons.
2. **Agreement:** the processing is necessary for the performance of a contract. This basis also applies to the pre-contractual stage, such as when you request an offer.
3. **Legal obligation:** the processing is necessary to comply with a legal obligation.
4. **Vital interest:** a vital interest is present if it concerns an interest that is essential to someone's life or health, and you cannot ask that person's consent to process personal data.
5. **Public interest:** the processing of data is necessary to perform a task of public interest/public authority. These are tasks and powers given by law to a specific organisation.
6. **Legitimate interest:** the processing of data is necessary to pursue your legitimate interest. In case there is a legitimate interest, then an assessment needs to be made between your interests and those of Framed by Ken.

1.3. Special categories of personal data

Framed by Ken does not process any special or sensitive personal data of customers, data subjects or website visitors. Framed by Ken also has no intention of processing data of those under the age of 18, unless they have permission from their parents or guardian.

However, Framed by Ken cannot verify whether a visitor is over 18. Parents and/or guardians are advised to be involved in their children's online activities to prevent the collection of personal data from minors without parental consent. If you believe that personal data of a minor has been processed without consent, please reach out. Framed by Ken will then delete this information.

2. Processing by Framed by Ken

The following shows for what purpose and on what respective basis personal data are processed. Personal data are thereby only kept for as long as strictly necessary to fulfil the purpose of processing.

2.1. Purpose and basis

Purpose	Basis
To contact you if necessary for the provision of services	Performance of a contract
To provide products and/or services to you	Performance of a contract
To inform you of changes to products and/or services	Performance of a contract
To process or respond to your request or enquiry	Legitimate interest
To refine the offer and make a more tailored offer	Legitimate interest
To comply with a legal obligation, such as tax filings	Legal obligation
For processing of payments	Performance of a contract
For portfolio purposes	Legitimate interest
Showcasing reviews	Consent
For marketing purposes	Consent
To analyse your behaviour on Framed by Ken's website	Legitimate interest

2.2. Retention periods

Personal data	Period	Reason
Name and address details	7 years (tax law)	Compliance with legal obligation
Contact information	As long as an agreement is in effect, and for up to 2 years after its termination	Legitimate interest
Correspondence	As long as an agreement is in effect, and for up to 2 years after its termination, unless necessary due to a legal requirement	Performance of a contract, Compliance with legal obligation

Payment details	7 years (tax law)	Compliance with legal obligation
Portrait	Indefinite period	Legitimate interest
Comment(s) on and account names on social media	Indefinite period, or until removal by yourself or respective platform	Legitimate interest
Other personal data you actively provide	As long as an agreement is in effect, and for up to 2 years after its termination	Performance of a contract

3. Personal data and third parties

The sections below address whether and to what extent personal data is shared with third parties and the treatment of transfers to third countries.

3.1. Sharing data with third parties

Framed by Ken does not sell your (personal) data to third parties. Personal data will only be provided if necessary for the execution of an agreement, you have given your explicit consent, or to comply with a legal obligation. With companies or organisations that process your personal data on behalf of Framed by Ken, a data processing agreement is concluded to ensure an equivalent level of protection and confidentiality of your personal data. Framed by Ken remains responsible for these data processing, unless third parties themselves qualify as controllers.

Personal data is shared with the following third parties:

Third party	Category	Purpose	Which data
Cloud86	Processor	DNS and webhosting	Encrypted data
DigiBoox	Processor	Accounting	Contact and payment details
Pic-Time	Processor	Web shop and client galleries	Contact and payment details
Google	Controller	Reviews	Name and mail address
	Processor	Email and cloud back-up	Encrypted data
Getsitecontrol	Processor	Contact form on website	Name and email address
Knab	Controller	Banking	Bank and payment details
Microsoft	Processor	Email and cloud back-up	Encrypted data
Mollie	Controller	Payments	Bank and payment details
Stripe	Controller	Payments	Bank and payment details

3.2. Transfer to third countries

Framed by Ken aims to process personal data as much as possible within the EU/EEA. Preference is therefore given to parties based within the EU/EEA. If this is not possible, processing must be carried out in accordance with Chapter V of the AVG, unless the third country in question has an adequate level of protection.

It is allowed to transfer personal data to a third country under 3 circumstances:

1. An adequacy decision by the European Commission (EC).
2. On the basis of appropriate safeguards:
 - a. Model contract (also called Standard Contractual Clauses or SCC in short).
 - b. Code of conduct or certification mechanism.
 - c. Binding corporate rules (BCR).
3. Specific exceptions.

4. Cookies

Framed by Ken utilises functional, tracking and analytical cookies. A cookie is a small text file that is stored in the browser of your computer, tablet, smartphone or other device that allows you to visit the website when you first visit it.

Framed by Ken uses cookies with a purely technical functionality. These ensure that the website works properly and that, for example, your preferred settings are remembered. These cookies are also used to make the website work properly and to optimise it. In addition, analytical and tracking cookies are used to track browsing behaviour on an anonymous basis to improve the services provided by Framed by Ken.

You can opt out of cookies by setting your internet browser to stop storing cookies. In addition, you can also delete any information previously stored via your browser's settings.

5. Security

Framed by Ken undertakes appropriate organisational and technical measures to secure personal data against, among others, abuse, loss, unauthorised access, unwanted disclosure and unauthorised modification of data.

The measures in place are evaluated periodically but at least annually.

The following is an overview of measures deployed.

Hardware/software: the devices used by Framed by Ken such as phones and laptops are secured with MFA, besides that any application or software used is in turn secured. Software, including antivirus programs, is kept up-to-date.

MFA: wherever possible, multi-factor authentication is used, meaning that not only a password but also, for example, a code or other security key is required.

Network: Only secured networks are used in combination with VPN (Wireguard or OpenVPN protocol).

Storage: no physical copies of personal data are kept or made. Local and cloud storage are secured. Secure backups are made on a regular basis in both cloud and physical hard drives.

Website: Framed by Ken's website is secured via an SSL certificate, and the connection is routed via HTTPS.

6. Data subjects' rights

As a data subject, you have the following the rights:

1. Access to, rectification of, and removal of personal data processed.
2. Withdraw your consent (if any), or object to the processing.
3. To transfer your (personal) data directly to another organisation chosen by you (data portability).

We will aim to respond to requests within one month. Under circumstances, this deadline may be extended by two months.

As a data subject, you also have the possibility to lodge a complaint with the national supervisory authority, the Dutch Data Protection Authority (AP), if you believe that Framed by Ken has failed to comply with the GDPR.

7. Other provisions

The websites of Framed by Ken, as well as this Privacy Policy, are governed exclusively by Dutch law.

Articles 20 and 22 of the Terms and Conditions of Framed by Ken, as last amended and published, apply mutatis mutandis.
