Privacy and cookie policy

Foppii Group | www.foppii.com

Part A Privacy policy

This policy explains how Foppii uses personal information when you visit our website, contact us, submit creative work, request a service or choose to receive our updates. It explains your choices and how to contact us about your information. Our Cookie Policy in Part B explains cookies and similar technologies.

1 Who is responsible for your information

Foppii Group, who for the purposes of this policy is based in the United States at the address shown on the website. This operator is the controller responsible for the personal information described in this policy. References to "Foppii", "we", "us" and "our" mean that controller.

Website: https://www.foppii.com
Privacy enquiries and complaints: contact@foppii.com
Please mark privacy correspondence "Privacy" so it can be directed to the appropriate person.

This policy covers the Foppii Records, Publishing, Entertainment, Creative and Artwork services operated by this controller. It also covers Foppii First fan updates and enquiries about our catalogue and store. Any Foppii Vision, online shopping or fulfilment service introduced by the same controller will be covered when made available, with additional information provided at the point of collection. If a different legal entity operates a service, we will identify that entity and its privacy notice before collecting information for it.

2 Information we collect

Contact and identity details. Depending on your interaction, these can include your name or pen name, artist or band name, business name, email address and any country or other contact details you choose to provide.

Creative submissions and project details. These can include poems, lyrics, spoken word or other text you paste into a form; links to music, portfolios or other work; background information; and creative briefs. A songwriting brief may include your preferred service, song or album plans, style, genre, mood, tempo, reference tracks and deadline. Licensing enquiries may include the work, proposed use, territory, term and budget.

Preferences and submission records. We receive the interests you select, marketing opt-in and submission confirmations where relevant, the wording and version of those confirmations, the selected language, submission time and a reference number. A confirmation that you own a work or want private review is separate from consent to receive marketing.

Technical information. Our website and hosting services receive information needed to deliver and protect the site, such as your IP address, browser and request information, and access times. Form protection uses coded identifiers derived from an IP address or sender email, together with request counts and expiry information. These identifiers are pseudonymous, not necessarily anonymous. Delivery records can include a submission reference, email-provider message identifier and delivery outcome.

Transactions and agreements. If you commission a service, agree a licence or place an order through an available sales channel, we may need billing, delivery, transaction, rights, royalty or other agreement details relevant to that arrangement. We explain any additional collection when it is needed. The website checkout is not open at the date of this draft and its forms do not ask for payment-card details.

The current website submission forms accept text and links rather than uploaded files. Please do not send payment-card numbers, passwords, identity documents or unnecessary sensitive information through an enquiry or submission form.

3 Where information comes from

Most information comes directly from you through our forms, email and other correspondence. We may also receive relevant details from someone acting for you, a collaborator or rights holder you identify, and providers involved in communications or an agreed transaction. We may review a website or portfolio that you ask us to consider. Where we obtain personal information about someone else, we provide the required privacy information unless a lawful exception applies.

Fields marked as required are needed to send a form or deal with the requested service. If you do not provide those details, we may be unable to respond, review your work or complete the request. Optional fields can be left blank. You do not have to agree to marketing to make an enquiry or submit work.

4 Why we use information and our lawful bases

We use a lawful basis appropriate to each purpose under the UK GDPR and the Data Protection Act 2018, as amended. A legitimate interest means a real business purpose that we assess against your rights and reasonable expectations.

Purpose	Information and use	Lawful basis
Enquiries	Contact details and correspondence to answer questions, arrange discussions and provide support.	Legitimate interests in responding to people who contact us and managing our services.
Private creative review	Contact details, work, links and confirmations to assess submissions and discuss a possible collaboration.	Legitimate interests in reviewing material sent for consideration and managing editorial and rights enquiries.
Quotes and agreed services	Project, contact and agreement details to prepare a requested quote or perform a commission, licence or other agreement.	Steps you request before a contract, or performance of a contract with you. For a business representative, legitimate interests in managing that business relationship.
Fan updates and marketing	Email address, chosen interests and consent records to send updates you have requested.	Consent. You can withdraw it at any time.
Website operation and security	Technical details, coded request identifiers and delivery records to operate the website, deliver permitted website code, troubleshoot problems and prevent spam, fraud and misuse.	Legitimate interests in providing a reliable and secure service. This does not replace consent for optional tracking.
Orders when available	Order, contact and delivery information to supply goods, arrange delivery and handle returns or refunds.	Performance of a contract or requested steps before a contract; legal obligations where applicable.
Records and legal matters	Relevant records for accounts, tax, privacy requests, complaints and legal claims.	Legal obligations where required by law; legitimate interests in establishing, exercising or defending legal claims.

Purpose	Information and use	Lawful basis
Optional website technologies	Information used by optional preference, analytics or advertising technologies described in Part B, if enabled.	Consent for the optional uses described in our Cookie Policy. Essential processing has the separate operational basis explained above.

YOUR RIGHT TO OBJECT. You can object to processing based on legitimate interests for reasons relating to your particular situation. We will stop unless we have compelling legitimate grounds that override your interests, rights and freedoms, or the processing is needed for legal claims. You can object to direct marketing at any time, and we will stop that use.

5 Creative work and confidential enquiries

We treat submissions as material for private assessment and correspondence. Sending a poem, recording, portfolio, artwork or brief does not automatically publish it, add you to a marketing list or transfer your copyright. We limit access to people who need it for the review or requested service and to the service providers needed to deliver it.

This privacy policy does not grant permission to publish, commercially exploit or train an AI model on submitted work. Any proposed additional use requires its own explanation and lawful basis, and separate contractual permission where required. Publication, credit, licensing, royalties and ownership are addressed in a separate agreement where a project proceeds.

Please remove unnecessary details about other identifiable people, especially private health information, religious or political beliefs, sexual life or allegations of criminal conduct. If a project genuinely needs sensitive or confidential information, contact us first so that suitable arrangements and any additional legal conditions can be established. Voluntarily including sensitive information in a general form is not treated as blanket explicit consent for other uses.

Where a business client instructs Foppii Creative to handle personal information solely on that client's behalf, the client may be the controller and Foppii its processor. That processing is governed by the relevant service and data-processing agreement. This policy still covers our own business-contact and administration records.

6 Email updates and marketing choices

Foppii First and other optional email updates are based on your positive choice and the interests you select. We keep a record of the relevant opt-in. We do not treat an enquiry, private submission or purchase as agreement to unrelated promotions from every Foppii division.

You can unsubscribe using the method in a marketing message or by emailing contact@foppii.com. Withdrawing marketing consent does not prevent necessary replies about an enquiry, a submission, an agreement or an order. We may keep a minimal suppression record to make sure your choice is respected.

We do not sell or rent personal information or provide our fan list to other organisations for their own marketing. Providers that deliver communications or operate our services may process information for those purposes under appropriate arrangements.

7 Who receives information

Information is available only where needed for the purpose concerned. Recipients can include:

- Authorised Foppii team members and editors, reviewers or contractors supporting the service you requested, subject to appropriate confidentiality arrangements.
- Resend, which delivers website form messages. It processes the entered details, submitted work or links, reply-to email address, relevant confirmations and delivery information.
- Website hosting and infrastructure services, including ChatGPT Sites and its infrastructure providers such as Cloudflare, and the email, forwarding and mailbox services used to receive and manage correspondence.
- Google, when your browser loads its Tag Manager container or associated tags, as explained in Part B. Loading the Google resource involves a technical request to Google even where no separate analytics or advertising tag has been enabled.
- Accountants, professional advisers, insurers, courts, regulators or other authorities where disclosure is necessary and lawful.
- If an order or rights arrangement is agreed, the payment, distribution, production, collecting-society, delivery or fulfilment partners needed for that arrangement, as explained when it is made.

A supplier that acts only on our instructions processes information under suitable data-processing terms. A payment provider, platform or other organisation may instead act as a separate controller for some activities, in which case its own privacy notice explains those activities. Future PayPal or dropshipping arrangements are not treated as active website services merely because they are planned.

8 Processing outside the United States

Some suppliers process information outside the U.S. However, we use a system stores email content and delivery data in the United States. Its published data-processing terms include standard contractual clauses and has a UK Addendum for relevant UK transfers. Its sending-region setting does not itself mean that stored email content stays in the UK or Europe.

Where we make a restricted international transfer, we use an applicable adequacy arrangement or appropriate safeguards, such as approved contractual terms and any required transfer assessment. We do not treat acceptance of this policy as general consent to overseas transfers. Contact us for information about a transfer affecting your data and how to obtain a copy or description of the relevant safeguards.

Foppii's own mailbox copies are separate from our U.S. delivery service.

9 How long we keep information

We retain personal information only for as long as it is needed for the stated purpose or a relevant legal requirement. We use the following criteria, taking account of the relationship, any unresolved issue, the sensitivity of the information and applicable accounting, rights and legal-claim requirements.

Record type	Retention criteria
Routine enquiries	Until the enquiry and any related follow-up have been completed. Further retention requires an identifiable continuing need, such as an ongoing service relationship or a dispute.
Work submitted for review	For the review and any active follow-up. If a submission does not proceed, the full work is removed when it is no longer needed for those purposes; limited correspondence or rights records may be retained where justified.
Agreements and transactions	For the agreement and any continuing licence, royalty, fulfilment or refund obligations, plus applicable statutory record-keeping and relevant legal-claim periods.

Record type	Retention criteria
Marketing preferences	While the subscription remains active and relevant. After withdrawal, a minimal suppression record may remain for as long as needed to prevent unwanted marketing.
Security and delivery records	For operational security, fault investigation and abuse prevention. Form request-limit records expire after short technical windows and are removed during subsequent housekeeping; expiry is not a guarantee of immediate physical deletion.
Privacy and consent records	For the time needed to answer a request or complaint, demonstrate how it was handled and meet relevant accountability or legal-claim requirements.

We review retained information and delete or anonymise it when the relevant need ends. Where data must remain in a backup or restricted legal archive, it is kept out of ordinary use and removed through the applicable retention cycle. A provider's delivery-log retention period does not determine how long a message remains in Foppii's receiving mailbox. You can ask us about the retention period or criteria applicable to a particular record.

10 Security

We use measures proportionate to the information and the risks, including controlled access, secure website transmission, server-side form handling and protections against automated abuse. No online transmission or storage system can be guaranteed completely secure. Please contact us promptly if you believe information sent to Foppii has been misdirected or accessed improperly. This does not limit our legal duties to protect information or respond to a breach.

11 Children and young people

Children and young people may visit our pages, and their information requires particular care. If you are under 18 and want to submit work or arrange a commercial project, please ask a parent or guardian to contact us so that we can establish an appropriate process. Do not send identity documents or unnecessary personal details through the general forms.

Children have their own data-protection rights. We consider their age, understanding and best interests when handling their information or a request made on their behalf. If you believe we have received a child's information without suitable arrangements, contact us so we can review and, where appropriate, restrict or delete it.

12 Your rights

Depending on the circumstances and lawful basis, you can ask to access your personal information; correct inaccurate or incomplete information; erase information; restrict its use; receive information you provided in a portable format where the legal conditions apply; and object to processing based on legitimate interests. You can withdraw consent at any time without affecting the lawfulness of processing before withdrawal. Your right to stop direct marketing is explained in section 4.

Email contact@foppii.com to exercise a right. You do not need to use legal wording or a particular form. We may request proportionate information to confirm your identity where necessary. We normally respond within one calendar month. If a lawful extension or other adjustment to the time limit applies, we will explain it and keep you informed. Requests are normally free; any permitted refusal or fee will be explained.

Rights are subject to lawful limits. For example, we may need to keep information required for tax records or legal claims. We will explain any restriction rather than treating a request as an automatic deletion of every record.

13 Automated decisions

We do not use the website forms to make solely automated decisions with legal or similarly significant effects on you. Technical checks may block spam or excessive submissions. If you think a genuine enquiry has been blocked, email contact@foppii.com so a person can assist.

14 Complaints

You can complain about our handling of personal information by emailing contact@foppii.com. We will acknowledge a privacy complaint within 45 days under applicable state privacy laws.

We welcome the opportunity to resolve a concern, but contacting us does not remove your right to approach the regulator or Federal Trade Commission. Where another data-protection law applies, you may also have rights through the relevant supervisory authority.

15 External services and policy changes

Our pages may link to independent services such as music platforms, retailers and production providers. Their own policies apply to information you give them. A link does not mean Foppii controls their processing.

We update this policy when our activities or legal obligations change. The current version will show its revision date. Where a change materially affects how existing information is used, we will provide appropriate notice and obtain new consent where required. An update or continued use of the website does not itself amount to consent.

Part B Cookie policy

This Cookie Policy explains storage and access technologies used on www.foppii.com and its language editions. The controller and privacy contact are identified in Part A. Cookies and local storage are separate from the personal information you actively send through a form.

1 What these technologies do

A cookie is a small record stored by your browser. Similar technologies include local storage, tracking pixels and scripts that store or access information on a device. Local storage can remain after you close the browser and does not automatically expire unless an expiry or removal process is implemented. Rules about these technologies can apply even where the stored information does not identify you by name.

2 Our approach to your choices

We use technologies that are genuinely necessary to provide a service you request or transmit a communication where the relevant legal exception applies. Our chosen approach is to obtain your prior consent for optional preference storage, analytics and advertising technologies. Optional choices are separate from your ability to browse ordinary pages or contact us.

Where optional technologies are offered, the controls provide Accept optional, Reject optional and Manage choices options. Optional categories remain off unless you choose them. You can change or withdraw your choices through **[INSERT THE WORKING COOKIE SETTINGS LINK]**. Continuing to browse, scrolling or closing a banner does not count as consent.

A minimal record may be stored to remember your choices and avoid repeatedly asking you. It must be used for that purpose, with its name and lifespan identified in the schedule below. If you use a different device or browser, or clear this record, you may need to choose again.

3 Categories

- Strictly necessary: storage or access essential for a service you request, security or remembering privacy choices. A label alone does not make a technology necessary.
- Optional preferences: remembering choices such as your preferred language beyond what is needed to display the current page. You can continue to select a language without agreeing to unrelated tracking.
- Optional analytics: measuring how pages and features are used to improve the website, where such tools are enabled and disclosed. Our chosen approach is consent before these optional tools operate.
- Optional advertising: measuring advertising or personalising promotions, only if such tools are introduced, identified and separately accepted. Agreeing to analytics is not agreement to advertising.

4 Storage and technology schedule

Name and provider	Type and purpose	Duration
foppii-lang Foppii	First-party local storage remembering the language edition.	No automatic expiry. Remains until overwritten, removed by the site or cleared by the browser or user.
[CONSENT RECORD NAME AND PROVIDER]	Remembers cookie choices once the consent controls are configured.	**[CONFIGURED LIFESPAN]**
[OTHER ACTIVE COOKIES OR IDENTIFIERS]	**[PROVIDER, DOMAIN, PURPOSE AND CATEGORY]**	**[VERIFIED LIFESPAN]**

We use Google Tag Manager container GTM-TLRQ6X5N to load and manage tags. Any optional tags must follow your choices, and their actual cookies or identifiers must appear in the completed schedule. Tag Manager's presence alone does not establish that Google Analytics or advertising cookies are used.

Loading Tag Manager sends a technical request to Google. Google states that it deletes standard HTTP request logs within 14 days and collects limited aggregated diagnostics. These limits do not necessarily apply to tags loaded through it. Google explains this at https://support.google.com/tagmanager/answer/9323295.

A cookie's lifespan is different from a provider's retention of information already collected. Part A covers wider retention. For technology with several purposes, the relevant conditions and choices apply to each purpose.

5 Changing choices and clearing stored information

Use the Cookie settings control to change or withdraw an optional choice. Withdrawal stops future storage or access for that purpose; it does not automatically erase information already collected lawfully. Contact us if you also want to exercise a data-protection right.

Your browser's website-data controls can also inspect, remove or block cookies and local storage. Clearing them may reset your preferences. Blocking genuinely necessary storage may affect a requested feature. These controls supplement the site's choices.

6 Links and media services

Current Foppii audio players use the website's own assets. External music, video, retail and social platforms have their own privacy and cookie practices. Before introducing embedded third-party players or widgets, we will identify their providers and purposes and apply the required tracking controls.

7 Contact and updates

For cookie questions, email contact@foppii.com with "Cookies" in the subject line. We update this policy and its schedule when the technologies or purposes change. Where a new purpose requires consent, we will ask for a fresh choice.