

# Data Privacy

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Our Company Data Protection Policy refers to our commitment to comply with the 6 data protection principles when collecting, processing and storing individuals' personal data.

## 1. Lawfulness, fairness and transparency

We will ensure that our data collection practices don't contravene the law and that they do not hide anything from data subjects from which the data is obtained.

To remain transparent with our data subjects, we will state the type of data we require and the reason we're collecting it, which may vary depending on the nature of the agreement.

## 2. Purpose limitation

We will only collect personal data for a specific purpose, depending on the nature the data is required and will be clear when stating what that purpose is. The data we collect will only be held for as long as is necessary to complete the purpose for which it was collected.

Processing that is necessary for historical or statistical purposes will be explained at the point at which it is collected.

## 3. Data minimisation

We will only process the personal data that is needed to achieve it's relevant purpose. For us, doing so has two major benefits. First, in the unlikely event of a data breach, the unauthorised individual will only have access to a limited amount of data. Second, data minimisation makes it easier for us to keep data accurate and up to date.

## 4. Accuracy

The accuracy of personal data is integral to our business. As such we will take every reasonable step to erase or rectify any data that is inaccurate or incomplete.

In addition, individuals have the right to request that we erase or rectify any inaccurate or incomplete data within 30 days.

## 5. Storage limitation

We will delete any and all personal data when it's no longer necessary.

## 6. Integrity and confidentiality

We will process all personal data in a manner that ensures appropriate security of the personal data provided, including protection against unauthorised or unlawful processing of said data and against accidental loss, destruction or damage, using appropriate technical or organisational measures. This includes but is not limited to encrypting and/or pseudonymising personal data wherever possible.

Signed:



Nicholas Noble, Chief Operations Officer

# Information Security

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With this policy, we ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights.

## Scope

This policy refers to all parties (employees, job candidates, customers, clients, suppliers etc.) who provide any amount of information to us.

## Who is covered under the Data Protection Policy?

Employees of our company and its subsidiaries must follow this policy. Contractors, consultants, partners and any other external entity are also covered. Generally, our policy refers to anyone we collaborate with or acts on our behalf and may need occasional access to data.

## Policy elements

As part of our operations, we need to obtain and process information. This information includes any offline or online data that makes a person identifiable such as names, addresses, user names and passwords, digital footprints, photographs, social security numbers, financial data etc.

Our company collects this information in a transparent way and only with the full cooperation and knowledge of interested parties. Once this information is available to us, the following rules apply.

## Our data will be:

Accurate and kept up-to-date, collected fairly and for lawful purposes only, processed by the company within its legal and moral boundaries, protected against any unauthorised or illegal access by internal or external parties.

## Our data will not be:

Communicated informally, stored for more than a specified amount of time, transferred to organisations, states or countries that do not have adequate data protection policies, distributed to any party other than the ones agreed upon by the data's owner (exempting legitimate requests from law enforcement authorities).

In addition to ways of handling the data the company has direct obligations towards people to whom the data belongs. Specifically we must:

Let people know which of their data is collected  
Inform people about how we'll process their data  
Inform people about who has access to their information  
Have provisions in cases of lost, corrupted or compromised data  
Allow people to request that we modify, erase, reduce or correct data contained in our databases

## Actions

To exercise data protection we're committed to:

Restrict and monitor access to sensitive data, develop transparent data collection procedures, train employees in online privacy and security measures, build secure networks to protect online data from cyber attacks, establish clear procedures for reporting privacy breaches or data misuse, include contract clauses or communicate statements on how we handle data, establish data protection practices (document shredding, secure locks, data encryption, frequent backups, access authorisation etc.)

## Disciplinary Consequences

All principles described in this policy must be strictly followed. A breach of data protection guidelines will invoke disciplinary and possibly legal action.

Signed:



Nicholas Noble, Chief Operations Officer

# Quality Policy

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Fourth Wall Creative Limited, incorporating Fourth Wall Limited; and Alloc8 Tickets Limited, based in the Wirral in the UK, provide creative design and marketing services; prototypes; and, the management and supply of physical and digital product fulfilment to end consumers worldwide.

Our organisation has established the Quality Management System, ISO 9001:2015, that complies with the International Organisation of Standardisation. This promotes a culture of quality assurance for the Company systems and processes, under the direction of the Chief Operations Officer.

Our main Quality Objective is to continually strive to deliver 100% client satisfaction. We do this by ensuring we regularly communicate with our clients to understand their needs so we can provide good quality products at a competitive price, specific to their requirements. In the provision of products, we also satisfy any legal and regulatory obligations.

The Chief Operations Officer takes pride in being able to provide enough resources to enable the staff to carry out their roles in a professional manner and within a safe environment. The people who work Fourth Wall Creative Limited, have been assessed on their competency and ability to do their job and immerse themselves in the organisational knowledge and culture. We actively encourage our staff to take every opportunity to develop themselves, and others, as appropriate. All personnel receive regular work-based appraisals. When identified, additional skills and/or training which is considered necessary to meet any changes in requirements and/or trends, is provided.

The management of our suppliers and sub-contractors involves the regular evaluation of each of them against the criteria we have set, to ensure they meet our requirements and provide quality products to our clients.

As an organisation, we are always looking at how we can do things better: obtaining feedback and monitoring client retention is essential to understanding how we can do this.

Our Quality Policy is regularly reviewed: the most recent version is displayed on our Staff Notice Board for all internal personnel. A copy is also provided to new staff at the time of induction. It can also be found on our website where we communicate our values externally. On request, we will provide a copy to any other of our Interested Parties.

Signed:



Nicholas Noble, Chief Operations Officer

# Health and Safety

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Fourth Wall Creative takes health and safety issues seriously and is committed to protecting the health and safety of its employees and all those effected by its business activities and attending its premises to the ISO 45001 standard.

We'll conduct periodical risk assessments and job hazard analysis to discover what is likely to harm employees following which we'll establish preventative measures accordingly as detailed, but not limited to those below:

- When employees work in dangerous contexts or locations, we'll make sure there are safety precautions like safety nets and ropes.
- We'll provide protective gear like gloves, protective uniforms, goggles etc. Using safety equipment is obligatory.
- Inspectors and quality control employees will inspect equipment and infrastructure regularly
- We'll hold employee training sessions in health & safety standards and procedures.
- All employees required to operate machinery will undergo training and be required to pass the relevant tests.
- All highly dangerous job tasks require at least two employees to be present.
- Employees who do repairs or cleaning need to put up caution signs.

- We prohibit smoking and vaping indoors.
- Enforce a substance abuse policy to protect employees from colleagues' misconduct.
- Functional smoke alarms and sprinklers that are regularly inspected by maintenance supervisor.
- Fire extinguishers and other fire protection equipment that are easily accessible.
- An evacuation plan posted on the walls of each floor and online.
- Fire escapes and safety exits that are clearly indicated and safe.
- Fully-stocked first-aid kits at convenient locations.

We will also schedule fire drills and emergency evacuations periodically. We will monitor performance of health and safety procedures and will revise them to ensure higher level of protection.

Signed:



Nicholas Noble, Chief Operations Officer

# Anti-bribery

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Fourth Wall Creative is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. We have zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the country or we operate.

Fourth Wall Creative will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, in regards to our conduct both at home and abroad.

Fourth Wall Creative recognises that bribery and corruption are punishable by up to ten years of imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business, and take our legal responsibilities seriously.

All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

Signed:



Nicholas Noble, Chief Operations Officer

# Supply Chain

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Fourth Wall Creative is committed to working with suppliers who meet the same exacting standards we set for ourselves.

As such we are a member of Sedex, home to the world's largest collaborative platform for sharing responsible sourcing data on supply chains, which is used by more than 38,000 members in over 150 countries.

Being part of Sedex enables Fourth Wall Creative to manage the performance around labour rights, health & safety, the environment and business ethics of the suppliers we use which enables us to make better-informed business decisions, and to drive continuous improvement across our value chains.

Signed:



Nicholas Noble, Chief Operations Officer

# Risk Management

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Fourth Wall Creative is committed to implementing an organisational philosophy that ensures risk management is an integral part of our business objectives, plans and management systems. Compliance with legislative requirements underpin our risk management policy, however the main function of our risk management is to ensure we meet our objectives.

We employ an ongoing process of identifying, evaluating and managing the potential risks associated with the products and services we provide.

**Leadership level** - Develops a risk management policy that is consistent with the risk management strategy. Defines risk management accountabilities and methodologies that meet strategy requirements.

**Senior level** - Implements plans and priorities to deliver risk management policy within agreed timescales and budgets. Implements risk management policy ensuring that ownership and responsibilities are fulfilled within authority limits.

**Management level** - Explains the purpose, role and benefits of embedding risk management policy and procedures into organisational policies and procedures. Advises on the appropriate use of methodologies, tools and techniques within the context of the risk policy.

**Support level** - Explains the purpose of risk management policy and procedures and its components. Explains the features of methodologies, tools and techniques and their uses, continually communicating feedback as to challenges or potential risks with management to ensure these are reviewed and applied to the risk management framework.

Signed:



Nicholas Noble, Chief Operations Officer

# Equality and Diversity

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The aim of Fourth Wall Creative is for our workforce to be truly representative of all sections of society and our customers, and for each employee to feel respected and able to give their best.

The organisation - in providing goods and/or services and/or facilities - is also committed against unlawful discrimination of customers or the public.

The policy's purpose is to:

- provide equality, fairness and respect for all in our employment, whether temporary, part-time or full-time.
- not unlawfully discriminate because of the Equality Act 2010 protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex (gender) and sexual orientation.
- oppose and avoid all forms of unlawful discrimination. This includes pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training or other developmental opportunities.

The organisation is committed to:

- encouraging equality and diversity in the workplace, as they are good practice and make business sense.
- creating a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued.

This commitment includes training managers and all other employees about their rights and responsibilities under the equality policy. Responsibilities include staff conducting themselves to help the organisation provide equal opportunities in employment, and prevent bullying, harassment, victimisation and unlawful discrimination.

All staff should understand they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers and the public.

- taking seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, customers, suppliers, visitors, the public and any others in the course of the organisation's work activities.

Such acts will be dealt with as misconduct under the organisation's grievance and/or disciplinary procedures, and any appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.

Further, sexual harassment may amount to both an employment rights matter and a criminal matter. In addition, harassment under the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence.

- making opportunities for training, development and progress available to all staff, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the organisation.
- decisions concerning staff being based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act).
- review employment practices and procedures when necessary to ensure fairness, and also update them and the policy to take account of changes in the law.
- monitor the make-up of the workforce regarding information such as age, gender, ethnic background, sexual orientation, religion or belief, and disability in encouraging equality and diversity, and in meeting the aims and commitments set out in the equality policy.



# Corporate Social Responsibility

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Fourth Wall Creative's Corporate Social Responsibility (CSR) policy outlines our efforts to give back to the world as it gives to us.

We want to be a responsible business that meets the highest standards of ethics and professionalism.

Our company's social responsibility falls under two categories: compliance and proactiveness. Compliance refers to our company's commitment to legality and willingness to observe community values. Proactiveness is every initiative to promote human rights, help communities and protect our natural environment.

## Compliance

**Legality** - Our company will:

- Respect the law in any country we operate in.
- Honour our internal policies.
- Ensure that all our operations are legitimate.
- Keep every partnership and collaboration open and transparent.

**Business ethics** - We'll always conduct business with integrity and respect to human rights by promoting:

- Safety and fair dealing.
- Respect toward our consumer.
- Anti-bribery and anti-corruption practices.

**Protecting the environment** - Our company recognises the need to protect the natural environment. Keeping our environment clean and unpolluted is a benefit to all of us. We'll always follow best practices as detailed in our Environment Policy.

**Protecting people** - We'll ensure that we:

- Don't risk the health and safety of our employees and community.
- Avoid harming the lives of local and indigenous people.
- Support diversity and inclusion.

**Human rights** - Our company is dedicated to protecting human rights. We are a committed equal opportunity employer and will abide by all fair labour practices. We'll ensure that our activities do not directly or indirectly violate human rights in any country.

## Proactiveness

**Volunteering** - Our company will encourage its employees to volunteer. They can volunteer through programs organised internally or externally. Our company may sponsor volunteering events from other organisations.

**Preserving the environment** - Apart from our legal obligations, our company will proactively protect the environment. Examples of relevant activities include:

- Recycling
- Conserving energy
- Using environmentally-friendly technologies

**Supporting the community** - Our company may contribute and participate in the communities in which we operate. For example, in addition to support we may provide non-profit organisations or to promote cultural and economic development of global and local communities, we also aim to recruitment and retain employees from local communities.

**Learning** - We will actively invest in Research and Development, for which we will be open to suggestions and listen carefully to ideas to continuously improve the way we operate.

Signed:



Nicholas Noble, Chief Operations Officer

# Environment

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Fourth Wall Creative recognises that it has a responsibility to the environment beyond legal and regulatory requirements. We are committed to reducing our environmental impact and continually improve our environmental performances as an integral part of our business strategy and operating methods by meeting the ISO 14001:2015 standards.

Ways we minimise our environmental impact includes, but is not limited to:

- **Compliance of law** – Ensuring all relevant laws and legislations are adhered to.
- **Reducing energy use** - turning the lights off when leaving office, having energy efficient light bulbs and utilising motion sensor lighting.
- **Reducing water use** – regular maintenance to check for dripping taps and pipes, as well as the use of efficient flushing systems in our facilities to reduce water use within our workplace.
- **Minimising waste and recycling** - recycling bins or double-sided printing will help reduce the business carbon footprint.
- **Promoting use of non-motorised transport** – We encourage our employees to walk, cycle or share lifts to go to work.

Signed:



Nicholas Noble, Chief Operations Officer