

Kelston Marketing Privacy Policy

Website: www.KelstonMarketing.com

By: Robert Warren

Introductory Note

Disclaimer: This privacy policy is a component of my Master of Science program at Full Sail University. This privacy policy culminates with a comprehensive policy for the student-selected case study organization Kelston Marketing. While my coursework utilizes a real organization, it is not directly reflective of or approved by them. Note: currently Kelston Marketing does not have a privacy policy, so all elements of this policy are fictitious using real world policies as models.

Kelston Marketing Privacy Policy

Effective on: [11/16/2025]

*"[Kelston] is committed to protecting your privacy. This Privacy Policy applies to the personal data we collect and process in the course of our business."
(HubSpot, Inc., n.d.)*

1. Personal Data

Apple states: "At Apple, we believe that you can have great products and great privacy. This means that we strive to **collect only the personal data that we need.**" (Apple, n.d.)

Kelston Marketing collects basic personal data (name, email, company name) and analytics data (page views, session duration, and referral source), strictly limited to what is necessary to provide marketing services and offer a personalized experience. When you fill out a contact form on the Kelston site data is used strictly for marketing purposes, (name, email, phone, company,

website, location, services interested, business details, budget, timeline, thanks-information liable to change upon form updates).

When using the Kelston Website, we may collect a variety of data like:

- **“Account Information.** Your [Kelston] data and related account details, including email address, devices registered, account status, and age
- **Device Information.** Data from which your device could be identified, such as device serial number, or about your device, such as browser type
- **Contact Information.** Data such as name, email address, physical address, phone number, or other contact information
- **Payment Information. Data about your billing address and method of payment, such as bank details, credit, debit, or other payment card information**
- **Transaction Information.** Data about purchases of [Kelston] products and services or transactions facilitated by [Kelston], including purchases on [Kelston] platforms
- **Fraud Prevention Information.** Data used to help identify and prevent fraud, including a device trust score
- **Usage Data.** Data about your activity on and use of our offerings, such as app launches within our services, including browsing history; search history; product interaction; crash data, performance and other diagnostic data; and other usage data
- **Location Information.** Precise location only to support services such as Find My or where you agree for region-specific services, and coarse location
- **Financial Information.** Details including salary, income, and assets information where collected, and information related to [Kelston]-branded financial offerings
- **Government ID Data.** In certain jurisdictions, we may ask for a government-issued ID in limited circumstances, including when setting up a wireless account and activating your device, for the purpose of extending commercial credit, managing reservations, or as required by law
- **Other Information You Provide to Us.** Details such as the content of your communications with [Kelston], including interactions with customer support and contacts through social media channels

You are not required to provide the personal data that we have requested. However, if you choose not to do so, in many cases we will not be able to provide you with our products or services or respond to requests you may have.” (Apple, n.d.)

Purpose

This section clarifies exactly what types of information Kelston Marketing gathers from users and reinforces transparency. It helps set boundaries about what is collected, ensuring consumers know what is and is not tracked. Studies on modern digital marketing show that “being transparent about how you collect and use customer data helps build trust with customers and can improve the quality of the data you collect.” (Customer Data Transparency, Management, and Privacy, n.d.) By adopting a minimal collection approach like Apple’s model, Kelston Marketing reduces both legal exposure and consumer anxiety, especially important in an era where data minimization is seen as best practice.

2. How Kelston Uses Information

“[Kelston] will use the information you provide us . . . to develop, support, and improve our products and services.” (HubSpot, 2024) *Kelston Marketing uses collected data solely to improve site performance, respond to inquiries, and offer personalized service recommendations.*

Purpose

This section explains why Kelston Marketing processes user data and reaffirms that all uses are tied to legitimate business operations rather than intrusive tracking or unrelated marketing. According to Twillo Segment and the General Data Protection Regulation it: “requires a data privacy policy that explains the following:

- What types of data you collect
- What you do with that data
- Why you need to collect that data

- How long your data will be stored for
- How customers can get in touch with your company

If your company is found to be in breach of the GDPR, it could be fined up to €20 million or up to 4% of the annual revenue.” (*Data Privacy Policy: What It Is & Why You Need One*, n.d.)

3. Cookies & Tracking Technologies

“When you visit any website, its server may generate a piece of text known as a “cookie” to place on your computer. Placing cookie text allows websites to “remember” visitors’ preferences, surfing patterns and behavior while they are connected.

Purpose

The cookie makes it easier for you to use the dynamic features of webpages. Cookies from [Kelston] webpages only collect information about your browser’s visit to the site; they do not collect any personal information about you.” (*Website Privacy Policy | Homeland Security*, n.d.) *Kelston Marketing uses standard analytics cookies to understand site usage trends. These cookies do **not** identify individual users and can be disabled by adjusting browser settings.*

4. Sharing & Disclosure of Information

“We do not sell your personal data.” (Apple Inc., 2024) *Kelston Marketing does not sell, rent, or share user information with third parties for their own marketing purposes. Data may be shared only with service providers strictly necessary to operate the website (such as hosting providers), all bound by confidentiality obligations.*

Purpose

Users deserve to know whether their data is being shared externally, and under what circumstances. This section gives them that assurance. “The Cisco survey ultimately concluded that data transparency is the biggest factor contributing to consumers' trust and desire to do business with organizations. It was far above other data privacy and data security factors, with 81% of survey respondents stating that they believe the way a business treats personal data

reflects the level of respect it has for its customers. This number was a 5% increase over the previous three annual studies, which saw steady numbers. In turn, when asked what the most important thing that organizations can do to build consumer trust is, the largest amount (39%) named data transparency.” (Grace, 2023)

5. Data Security Measures

“To Secure and Protect our Product and [Kelston] Users. We use your account information to investigate and help prevent security incidents. We may also use this information to meet legal requirements. We use your information to verify user accounts, new product sign-ups, and to detect and prevent product abuse.

We use log files to provide general statistics regarding use of the websites by you, including how you use our websites, what country you are logging in from (for analytics, export control and regulatory purposes) and to help improve the navigation experience. Your IP addresses are also collected and logged for security and debugging purposes, for example to track access patterns, investigate security events and incidents. For these purposes we associate automatically-collected data to other personal data provided by you such as name, email address, address, and phone number.” (HubSpot, Inc., n.d.) *Kelston Marketing uses encryption, secure data storage, access controls, and routine security monitoring to safeguard all user data.*

Purpose

This clause communicates how Kelston protects personal data and reassures users that reasonable security controls are in place. Usercentric mentions: “when customers trust you with their data ... it’s your duty to respect their privacy and handle their data ethically and legally.” (Peltea & GmbH, 2024) Explicitly stating our safeguards signals due diligence — and helps reduce legal risk for a small marketing agency.

User Rights & Choices

“A strong privacy policy should address the collection, use, sharing, and protection of users’ personal information . . . and provide clear instructions for individuals to manage their data privacy preferences.” (Fip, 2023) *Kelston Marketing allows users to request access to, correction of, or deletion of their*

data at any time by emailing support@KelstonMarketing.com (fictitious email for example)

Purpose

This section explains consumers' ability to control their data—an increasingly central expectation even in jurisdictions without strict privacy legislation. Osano describes user control as a competitive advantage: “privacy-first marketing is becoming companies' competitive advantage.” (Cipm, 2025) Offering access, correction and deletion builds credibility and aligns Kelston Marketing with modern ethical marketing practices.

References:

- Apple. (n.d.). *Apple Legal - Legal - Apple Privacy Policy - Apple*. Apple Legal. <https://www.apple.com/legal/privacy/en-ww/>
- *Customer data transparency, management, and privacy*. (n.d.). <https://business.adobe.com/blog/basics/customer-journey-data-transparency>
- HubSpot, Inc. (n.d.). *HubSpot Privacy Policy*. <https://legal.hubspot.com/privacy-policy>
- *Data Privacy Policy: What it is & why you need one*. (n.d.). Segment. <https://segment.com/resources/data-privacy/why-your-company-needs-a-data-privacy-policy/>
- *Website Privacy Policy | Homeland Security*. (n.d.). U.S. Department of Homeland Security. <https://www.dhs.gov/privacy-policy>
- Peltea, A., & GmbH, U. (2024, September 1). *Comprehensive guide to privacy-first marketing*. Consent Management Platform (CMP) Usercentrics. <https://usercentrics.com/guides/privacy-led-marketing/privacy-first-marketing/>
- Grace, C. (2023, May 30). *Why data privacy and transparency matters to building customer trust*. LRN. <https://lrn.com/blog/why-data-privacy-and-transparency-matters-to-building-customer-trust>
- HubSpot, Inc. (n.d.). *HubSpot Privacy Policy*. <https://legal.hubspot.com/privacy-policy>
- Fip, M. K. C. C. C. (2023, August 24). *How marketing agencies can create and offer privacy Policies*. Termly. <https://termly.io/resources/guides/marketing-agency-privacy-policy/>

- Cipm, M. D. (2025, November 14). Marketing Data Privacy: A Comprehensive Guide for 2025. *Osano*. <https://www.osano.com/articles/marketing-data-privacy-guide>