

# Privacy policy

## 1.Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of such persons; in other words, where we determine the purposes and means of the processing of that personal data.

## 2.Credit

- 2.1 This document was created using a template from Docular (<https://seqllegal.com/free-legal-documents/privacy-policy>).

## 3.The personal data that we collect

- 3.1 In this Section 3 we have set out the general categories of personal data that we process.
- 3.2 We may process data enabling us to get in touch with you ("**contact data**"). The contact data may include your name, email address, telephone number, postal address and/or social media account identifiers. The source of the contact data is you.
- 3.3 We may process information contained in or relating to any communication that you send to us or that we send to you ("**communication data**"). The communication data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms.
- 3.4 We may process [data about your use of our website and services] ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system.

## 4.Purposes of processing and legal bases

- 4.1 In this Section 4, we have set out the purposes for which we may process personal data and the legal bases of the processing.
- 4.2 **Operations** - We may process your personal data for the purposes of providing our services, generating invoices, bills and other payment-related documentation. The legal basis for this processing is our legitimate interests, namely the performance of a contract between you and us or taking steps, at your request, to enter into such a contract.

- 4.3 **Direct marketing** - We may process contact data for the purposes of creating, targeting and sending direct marketing communications by email, SMS, post and/or and making contact by telephone for marketing-related purposes. The legal basis for this processing is our legitimate interests, namely promoting our business and communicating marketing messages and offers to our website visitors and service users.
- 4.4 **Record keeping** - We may process your personal data for the purposes of creating and maintaining our databases, back-up copies of our databases and our business records generally. The legal basis for this processing is our legitimate interests, namely ensuring that we have access to all the information we need to properly and efficiently run our business in accordance with this policy.

## **5. Providing your personal data to others**

- 5.1 We may disclose your personal data to our insurers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice.
- 5.2 Financial transactions relating to our services may be handled by our payment services providers, *paypal*. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices at <https://www.paypal.com/uk/webapps/mpp/ua/privacy-full>.
- 5.3 In addition to the specific disclosures of personal data set out in this Section 5, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

## **6. Retaining and deleting personal data**

- 6.1 This Section 6 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 6.3 We will retain your personal data as follows:

- (a) contact data will be retained for a minimum period following the date of the most recent contact between you and us, and for a maximum period of 6 years following that date;
- (b) communication data will be retained for a minimum period following the date of the communication in question, and for a maximum period of 6 years following that date;
- (c) usage data will be retained for 6 years following the date of collection and

6.4 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## 7. Your rights

7.1 In this Section 7, we have listed the rights that you have under data protection law.

7.2 Your principal rights under data protection law are:

- (a) **the right to access** - you can ask for copies of your personal data;
- (b) **the right to rectification** - you can ask us to rectify inaccurate personal data and to complete incomplete personal data;
- (c) **the right to erasure** - you can ask us to erase your personal data;
- (d) **the right to restrict processing** - you can ask us to restrict the processing of your personal data;
- (e) **the right to object to processing** - you can object to the processing of your personal data;
- (f) **the right to data portability** - you can ask that we transfer your personal data to another organisation or to you;
- (g) **the right to complain to a supervisory authority** - you can complain about our processing of your personal data; and
- (h) **the right to withdraw consent** - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.

7.3 These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting [[https://edpb.europa.eu/our-work-tools/general-guidance/gdpr-guidelines-recommendations-best-practices\\_en](https://edpb.europa.eu/our-work-tools/general-guidance/gdpr-guidelines-recommendations-best-practices_en) and <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>].

7.4 You may exercise any of your rights in relation to your personal data by written notice to us, using the contact details set out below.

### **8.About cookies**

8.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

8.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

8.3 Cookies may not contain any information that personally identifies a user, but personal data that we store about you may be linked to the information

### **9.Our details**

9.1 This website is owned and operated by Katy Smith.

9.2 You can contact us:

(a) using our website contact form;

(b) by email, using the email address published on our website.