

# Angela Limb - General privacy policy, and use of cookies notes.

Last updated: 10<sup>th</sup> February 2021

## 1. Introduction

- 1.1 We are committed to safeguarding the privacy of users of services provided by Angela Limb.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of users of services provided by Angela Limb; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 We do not use tracking cookies on our website for the purpose of tracking a visitor's habits or providing targeted advertising etc. although some non-personal information such as a visitor's browser version, country of origin or other general data may be logged by automated server systems software such as 'hit counters' used for general statistical visitor analysis that cannot be traced back to an identifiable individual or company.
- 1.4 We do not use Google Analytics (or other similar tools from alternate providers) for tracking purposes or targeted advertising.
- 1.5 In this policy, "we", "us" and "our" refer to Angela Limb.

## 2. Credit for this document

- 2.1 This document was created using a template from SEQ Legal (<https://seqlegal.com>).

## 3. How we use your personal data

- 3.1 In this Section 3 we have set out:
  - (a) The general categories of personal data that we may process;
  - (b) the purposes for which we may process personal data; and
  - (c) the legal basis of the processing.
- 3.2 We may process data about your general use of our website and services ("**usage data**"), but not any personally identifiable information, except in an instance where you choose to fill in an online form requesting more information from us, and where you have manually entered your personal information into that form and consented to send that information to us. Our online forms convert your data to an email that we receive, no personal data gathered in those forms is retained on our web servers, nor passed to any third party at that time. The generic usage data we gather may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit to our website, number of page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use on a single visit. The source of the usage data is our general 'hit counter' software provided by our website host. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.

- 3.3 Our website does not require a user login for access to any elements of the site, and as such no personal information is requested by or stored on our server platform.
- 3.4 We may process information contained in any enquiry you submit to us regarding goods and/or services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant goods and/or services to you. The legal basis for this processing is consent, as you will have had to complete and consent to send an enquiry form on our website.
- 3.5 We may process information relating to our customer relationships, including customer contact information ("**customer relationship data**"). The customer relationship data may include your name, your employer, your job title or role, your contact details, and information contained in communications between us and you or your employer. The source of the customer relationship data is you or your employer. The customer relationship data may be processed for the purposes of managing our relationships with customers, communicating with customers, keeping records of those communications and promoting our products and services to customers. The legal basis for this processing is our legitimate interests, namely the proper management of our customer relationships.
- 3.6 We may process information relating to transactions, including purchases of goods and services that you enter into with us ("**transaction data**"); although please note that we do not process any payments via our website, nor do we store any transaction information on any web hosted platforms. The transaction data may include your contact details, your payment details and the transaction details. Please note that we do not store digitally on any of our own IT systems, nor those of any third party providers servers/systems a record of debit/credit card details. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely the proper administration of our business.
- 3.7 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is either consent or the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 3.8 We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence 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. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.
- 3.9 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

- 3.10 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 3.11 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing 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.

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

- 4.1 We have no need to, nor do we, disclose your personal data to any other group or company.

#### **5. International transfers of your personal data**

- 5.1 We have no need to, nor do we, transfer your personal data outside the UK.

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

- 6.1 This Section 6 sets out our data retention policies and procedure, 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) Personal data required to provide a contract or ongoing service agreement will be retained for the duration of the agreement plus a minimum period of three years following the cessation of the agreement; 'transactional data' for all financial transactions will be retained for a minimum period of seven years following the cessation of the agreement, as required for accounting and taxation purposes.

Any personal data or other information that may be required to settle a legal dispute or that is used in part of a defence against a legal dispute may be retained indefinitely.

- 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. Amendments**

- 7.1 We may update this policy from time to time by publishing a new version on our website.
- 7.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 7.3 We may also notify you of significant changes to this policy by email.

#### **8. Your rights**

- 8.1 In this Section 8, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.
- 8.2 Your principal rights under data protection law are:
- (a) the right to access;
  - (b) the right to rectification;
  - (c) the right to erasure;
  - (d) the right to restrict processing;
  - (e) the right to object to processing;
  - (f) the right to data portability;
  - (g) the right to complain to a supervisory authority; and
  - (h) the right to withdraw consent.
- 8.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.
- 8.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.
- 8.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.
- 8.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

- 8.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- 8.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.
- 8.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- 8.10 To the extent that the legal basis for our processing of your personal data is:
- (a) consent; or
  - (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- 8.11 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.
- 8.12 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 8.13 You may exercise any of your rights in relation to your personal data by written notice to us.

## **9. About cookies**

- 9.1 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.
- 9.2 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.
- 9.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

## **10. Cookies that we use**

- 10.1 We do not directly use cookies on our website as previously stated, although our web-host uses a general 'hit-counter' for obtaining generic non-identifiable information about visitors on the host server.