

# **Privacy Policy**

- This Privacy Policy is tailored to comply with the General Data Protection Regulation ((EU) 2016/679) (**GDPR**) and replaces our previous Privacy Policy.
- Sue Jarvis, trading as Halcyon Bracelets, 7 Radford Crescent, Billericay, Essex, CM12 0DU is committed to privacy for everyone who accesses our services. Under the Data Protection Act, we must comply with certain requirements which are designed to ensure that any Data you provided to us is processed with due care and attention.
- This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By reading accepting and consenting to the practices described in this policy you have accepted these terms.
- For the purpose of the Data Protection Act (the **Act**), the data controller is Sue Jarvis trading as Halcyon Bracelets, 7 Radford Crescent, Billericay, Essex, CM12 0DU contactable on sue@halcyonbracelets.com

Our nominated representative for the purpose of the Act is Mrs S Jarvis trading as Sue Jarvis, trading as Halcyon Bracelets, 7 Radford Crescent, Billericay, Essex, CM12 0DU.

Any data we hold is kept secure in accordance with the GDPR

## **1. Introduction**

- 1.1 We are committed to safeguarding the privacy of our clients and service users.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of our clients and visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 You consent to our use and process of data in accordance with the terms of this policy unless stated otherwise.
- 1.4 In this policy, "we", "us" and "our" refer to Sue Jarvis, trading as Halcyon Bracelets, 7 Radford Crescent, Billericay, Essex, CM12 0DU

## **2. How we use your personal data**

- 2.1 In this Section 2 we have set out:
  - (a) the general categories of personal data that we may process;

- (b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
  - (c) the purposes for which we may process personal data; and
  - (d) the legal bases of the processing.
- 2.2 We may process data about your use of our websites, orders and services ("**usage data**"). The legal basis for this processing is our legitimate interests, namely monitoring and improving our services.
- 2.3 We may process your application data, this is data provided to us to store your personal information if you have provided it to us as part of registering on our system as a client, customer or potential client or customer ("**application data**"). The application data may include your name, title, company, partnership, position in company or partnership, email address, postal address and telephone number. The source of the application data is you. The application data may be processed for the purposes of operating any business transaction including providing our services, ensuring the security of our services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is consent and or our legitimate interests, namely the proper administration of our business and the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract. We may also collect and store information about you in reference to an employment application and that data will be stored in accordance with the terms of this policy.
- 2.4 We may process your information included in your personal profile or application by email ("**profile data**"). The profile data may include your name, address, telephone number, email address, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details and employment details. The profile data may be processed for the purposes of enabling and monitoring your use of our services. The legal basis for this processing is consent and or our legitimate interests, namely the proper administration of our business and or the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 2.5 We may process your personal data that are provided in the course of the use of our website and services ("**service data**"). The service data may include your personal data. The service data may be processed for the purposes of operating our website and services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is consent and or our legitimate interests, namely the proper administration of our business and or the performance of a contract between you and us or another and/or taking steps, at your request, to enter into such a contract.
- 2.6 We may process information that you provide to us through our services ("**publication data**"). The publication data may be processed for the purposes of enabling such publication and administering our services. The legal basis for this processing is consent and or our legitimate interests,

namely the proper administration of our business and or the performance of a contract between you and us and/or another and taking steps, at your request, to enter into such a contract.

- 2.7 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. We may process information about you to carry out the provision of services to you. We may also process information to ensure that we comply with our legal obligations to check your identity and prevent fraud.
- 2.8 We may process information that you provide to us for the purpose of subscribing to our email notifications or order requests ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications, responses and/or newsletters. The legal basis for this processing is consent and the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 2.9 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. 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 business and communications with you.
- 2.10 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. We may disclose your information to comply with a legal requirement or as ordered to do so by a Court or Tribunal. We will take reasonable efforts to communicate with you prior to doing so unless we are legally restricted from doing so. We do not sell, rent or otherwise make personal information commercially available to any third party unless specified in this policy.
- 2.11 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.
- 2.12 In addition to the specific purposes for which we may process your personal data set out in this Section 2, 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.

2.13. In addition, upon registration or contact, you may provide to us your name, your email address and other information. Without that information, we cannot provide our services. We have installed physical, electronic and managerial processes that keep your information safe when it is collected and subsequently stored.

2.14 Please do not supply any other person's personal data to us, unless we prompt you to do so.

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

3.1 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

3.2 In addition to the specific disclosures of personal data set out in this Section 3, 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.

3.3 In the unlikely event that a liquidator, administrator or receiver is appointed over us or on any part of our assets, that insolvency practitioner may transfer your information to a third party purchaser of the business provided that the purchaser undertakes to use your information for the same purposes as set out in this policy.

3.4 If Sue Jarvis, trading as Halcyon Braclets, 7 Radford Crescent, Billericay, Essex, CM12 0DU were merged with or taken over by another organisation, your personal data would become available to such organisation provided that such organization provided an undertaking only to use it for the same purposes as are set out in this policy.

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

4.1 In this Section 4, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA). Because of the international nature of our business and orders, we may need to transfer your personal data including details as specified on your order and email address to other countries in response to order requests and to other third parties in connection with the purposes set out in this Policy. For this reason, we may transfer your personal Data to other countries that may have different laws and data protection compliance requirements to those that apply in the country in which you are located. Where we transfer your Personal Data from the EES to recipients located outside of the EEA who are not in Adequate Jurisdictions, we do so on the

basis of Standard Contractual Clauses. We will nevertheless Process your Personal Data, from the point at which we receive those data, in accordance with the provisions in this Privacy Policy.

- 4.2 You acknowledge that personal data that you submit for publication through our services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

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

- 5.1 This Section 5 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.

- 5.2 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.

- 5.3 We will retain your personal data as follows:

- (a) Personal Data information will be retained for a minimum period of 24 months following submission, and for a maximum period of 7 years following submission.

- 5.4 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:

- (a) the period of retention of *personal data category* will be determined based on an annual review and will therefore be no longer than 7 years.

- 5.5 Notwithstanding the other provisions and information in this Section 5, we may retain your personal data where such retention is necessary for compliance with a legal or contractual obligation to which we are subject, or in order to comply with a statutory limitation period or in order to protect your vital interests or the vital interests of another natural person.

## **6. Amendments**

- 6.1 We may update this policy from time to time and we will notify you of any change if we are carrying out business with you.

- 6.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

- 6.3 We may notify you of changes to this policy by email or through the private messaging system or email.

## **7. Your rights**

- 7.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:

- (i) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a

solicitor or bank plus an original copy of a utility bill showing your current address.

- 7.2 We may withhold personal information that you request to the extent permitted by law.
- 7.3 You may instruct us at any time not to process your personal information for marketing purposes.
- 7.4 In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes.

## **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.
  - (i) the right to compensation
- 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 contacting us at the registered office address.

## **9. Our details**

9.1 Our trading address is Sue Jarvis, trading as Halcyon Bracelets, 7 Radford Crescent, Billericay, Essex, CM12 0DU

9.2 Our principal place of business is at the above address

9.3 You can contact us:

- (a) by post, to the postal address given above;
- (b) by telephone
- (d) by email, using the email address provided to you in our initial contact.

## **10. Data Compliance Manager**

10.1 Our Data Compliance Managers contact details is Sue Jarvis, trading as Halcyon Bracelets, 7 Radford Crescent, Billericay, Essex, CM12 0DU sue@halcyonbracelets.com This business is registered with the ICO.

This privacy policy was last updated on 3<sup>rd</sup> August 2018.