

# Privacy policy

## 1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors and service users.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of our website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.
- 1.4 Our website incorporates privacy controls which affect how we will process your personal data. By using the privacy controls, you can specify whether you would like to receive direct marketing communications and limit the publication of your information.
- 1.5 In this policy, "we", "us" and "our" refer to Laura Watson. For more information about us, see Section 12

## 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 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. 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.
- 2.3 We may process your account data ("**account data**"). The account data may include your name, company, address and email address and to allow is to communicating with you and supply you goods and or services. The legal basis for this processing is consent or you are an existing customer.

- 2.4 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.
- 2.5 We may process information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website ("**transaction data**"). The transaction data may include your contact details, and the transaction 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.
- 2.6 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 consent.
- 2.7 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 the proper administration of our website and business and communications with users.
- 2.8 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defense 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.
- 2.9 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.
- 2.10 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.
- 2.12 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 any member of our group of companies insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy.
- 3.2 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 defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 3.3 We may disclose your personal data to suppliers or subcontractors insofar as reasonably necessary for the performance of a contract between you and us.
- 3.4 Financial transactions relating to our services may be handled by our payment services providers, Worldpay. 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://online.worldpay.com/terms/privacy>.
- 3.6 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 defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

#### **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).
- 4.2 We have offices and facilities in the UK. The European Commission has made an "adequacy decision" with respect to the data protection laws of each of these countries with the EU. Transfers will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission, a copy of which can be obtained from the EU Commission
- 4.3 The hosting facilities for our website are situated in the UK. The European Commission has made an "adequacy decision" with respect to the data protection laws of each of the EU Countries. Transfers will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission, a copy of which you can obtain from the EU Commission

#### **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) **usage data** will be retained for a minimum period of 25 months following of the last website
  - (b) **account data** will be retained for as long as required by the rules of HMRC and for the purposes of the performance of a contract between you and us.
  - (c) **enquiry data** will be retained for a minimum period of 90 days and a maximum of 120 days unless the enquirer become an account then 5.3 b applies
  - (d) **notification data** will be retained for as long and the consent remains in force
  - (e) **correspondence data** will be retained for a minimum period of 90 days and a maximum of 120 days unless the enquirer become an account then 5.3 b applies or such disclosure is necessary for the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 5.5 Notwithstanding the other provisions of this Section 5, 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.

## 6. Amendments

- 6.1 We may update this policy from time to time by publishing a new version on our website.
- 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 post

## 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:
- (a) the payment of a fee (currently fixed at GBP 10); and
  - (b) 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, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

## **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 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.

## **9. Cookies that we use**

- 9.1 We use cookies for the following purposes:
  - (a) analysis - we use cookies to help us to analyse the use and performance of our website and services, cookies used for this purpose are: Google analytics cookies;
  - (g) cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally

## **10. Cookies used by our service providers**

- 10.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.
- 10.2 We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>. The relevant cookies are: First Part Cookies
- 10.4 We use Wordfence Cookies to secure our website. This service uses cookies for

- (a) To uniquely identify visitors shown in Wordfence Live traffic.
- (b) To track a user who was previously logged into WordPress but has logged out to ensure that Falcon cache does not show that user cached pages
- (c) If a user has visited a unique page that allows them to bypass country blocking a cookie is set to identify that user so that country blocking does not prevent them from viewing the site.

You can view the privacy policy of this service provider at

<https://www.wordfence.com/terms-of-use-and-privacy-policy/> The relevant cookies are: wordfence\_verifiedHuman – Wordfence Cookie used to verify if the visitor is a bot or human wfv\_1614852471 – Wordfence Tracks a user duration so that so that the page views can be grouped together

## **11. Managing cookies**

11.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).
- (g) [https://www.wordfence.com/?utm\\_source=docsSite&utm\\_medium=web&utm\\_campaign=docsSite](https://www.wordfence.com/?utm_source=docsSite&utm_medium=web&utm_campaign=docsSite)

11.2 Blocking all cookies will have a negative impact upon the usability of many websites.

11.3 If you block cookies, you will not be able to use all the features on our website.

## **12. Our details**

12.1 This website is owned and operated by Sivatech Business Solutions Ltd.

12.2 We are registered in England and Wales under registration number 7637825 and our registered office is at 30 Upper Street, Thame, Oxon OX9 3EZ

12.3 Our principal place of business is at

Gatehouse Close  
Aylesbury  
Bucks  
HP19 8DJ

12.4 You can contact us:

- (a) by post, to the postal address given above
- (b) using our website contact form
- (c) by telephone, on the contact number published on our website
- (d) by email, using the email address published on our website from time to time

**13. Data protection officer**

13.1 Our data protection officer's contact details are:

Laura Watson  
Sivatech Business Solutions Ltd  
Gatehouse Close  
Aylesbury  
Bucks  
HP19 8DJ