

PRIVACY POLICY MODEL (*)

At _____ (name of company), we're committed to protecting and respecting your privacy.

This Policy explains when and why we collect personal information about people who visit our website, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

We may change this Policy from time to time so please check this page occasionally to ensure that you're happy with any changes.

Any questions regarding this Policy and our privacy practices should be sent by email to _____ (add email address) or by writing to _____ (add postal address). Alternatively, you can telephone _____ (add phone number).

Who are we?

We're _____ (name of company), _____ (short presentation of the company, including the full company's details and company registration number, subsidiaries, places of business and a list of the main websites).

(only if applicable) You can contact our Data Protection Officer (DPO) by email to _____ (add email address) or by writing to _____ (add postal address).

How do we collect information from you?

We obtain information about you when you use our web-site, for example, when:

- _____ (only keep what fits + add any way in which you usually collect personal data)
- you contact us about products and services,
- you make an online purchase
- you subscribe to our newsletter

or, occasionally, from third parties who you have separately authorised to provide such information.

16 OR UNDER?

We are especially concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please ask your parent/guardian's permission beforehand and ask them to help you whenever you provide us with any personal information.

What type of information is collected from you?

The personal information we collect might include your name, address, email address, IP address, and information regarding what web-pages are accessed and when. _____ (If applicable, add additional personal data you usually collect)

(only keep if applicable) If you purchase a product from us, your card information is not held by us, it is collected by our third party payment processors, who specialise in the secure on-line capture and processing of credit/debit card transactions, as explained below.

How is your information used?

We may use your information:

- _____ (only keep what fits + add any personal data you usually collect)
- to process orders that you have submitted;
- to carry out our obligations arising from any contracts entered into by you and us;
- to dealing with entries into a competition;
- to seeking your views or comments on the services we provide;
- to notify you of changes to our services;
- to send you communications which you have requested and that may be of interest to you. These may include information about campaigns, appeals, promotions of our associated companies' goods and services;
- to process a grant or job application;
- for administrative and business purposes;
- to improve our business and website;
- for advertising and analytical purposes;
- in connection with our legal rights and obligations;
- for certain additional purposes only with your explicit consent.

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations (for example _____ (add processing activities you are obliged by law to perform)). We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us.

Who has access to your information?

(Choose alternative) We will not sell or rent your information to third parties. / We will sell or rent your information to third parties for the following purposes. *(specify)*

(Only if applicable) Third Party Service Providers working on our behalf: We may pass your information to our third party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to send you mailings). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure, not to use it for their own direct marketing purposes, and to keep it for no longer than necessary for the purposes of completing the tasks and providing the services to you on our behalf. Please be reassured that we will not release your information to third parties for them to use for their own direct marketing purposes, unless you have requested us to do so, or where we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

(Alternatively & only if applicable) Third Party Product Providers we work in association with: We work closely with various third party product providers to bring you a range of quality and reliable products and services designed to meet your needs. _____ *(if applicable, give an example from your business)*. When you enquire about or purchase one or more of these products, the relevant third party product provider will use your details to provide you with information and carry out their obligations arising from any contracts you have entered into with them. In some cases, they will be acting as a data controller of your information and therefore we advise you to read their Privacy Policy. These third party product providers will share your information with us which we will use in accordance with this Privacy Policy.

(Only if applicable) When you are using our secure online payment pages, your payment is processed by a third-party payment processor, who specialises in the secure online capture and processing of credit/debit card transactions. If you have any questions regarding secure transactions, please contact us.

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation, or if we're under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our customers. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

Your choices

You have a choice about whether or not you wish to receive information from us. If you want to receive communications from us about exciting offers, then you can select your choices by ticking the relevant boxes situated on the form on which we collect your information.

We will not contact you about our interesting offers by email, post, phone or text message unless you have given your explicit prior consent. You can change your marketing preferences at any time by contacting us by email: _____ (add email address) or by telephone _____ (add phone number).

Your rights in relation to your personal data

You have the right:

- to access your personal data and to be informed about its use
- to correct your personal data
- to have your personal data deleted
- to restrict the use of your personal data
- to object to the use of your personal data
- to complain to a supervisory authority
- to withdraw your consent to the use of your personal data
- to ask for the portability of the personal data you shared with us

How you can access and update your information

The accuracy of your information is important to us. We're working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change email address, or any of the other information we hold is inaccurate or out of date, please email us at: _____ (add email address) or by writing to _____ (add postal address). Alternatively, you can telephone _____ (add phone number).

Security precautions in place to protect the loss, misuse or alteration of your information

When you give us personal information, we take steps to ensure that it's treated securely. Any sensitive information (such as credit or debit card details) is encrypted and protected with the necessary software encryption _____ (add applicable protection measures). When you are on a secure page, a lock icon will appear on the bottom of web browsers such as Microsoft Internet Explorer.

Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you

(*) This document is part of FLINN's GDPR self-help toolkit © 2018 which is provided for illustrative purposes only. It is not legal advice and may not cover all relevant issues. It is not intended and should not be used as a substitute for seeking appropriate legal advice in any particular case.

transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

(Only if applicable) Profiling

We may analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. We may make use of additional information about you when it is legitimately available from external sources to help us do this effectively. We may also use your personal information to detect and reduce fraud and credit risk.

Use of 'cookies'

Like many other websites, our website uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, we use cookies to store your country preference. This helps us to improve our website and deliver a better more personalised service.

It is possible to switch off cookies by setting your browser preferences. For more information on how to switch off cookies on your computer, visit our full cookies policy, [\(available here—add hyperlink\)](#). Turning cookies off may result in a loss of functionality when using our website.

Links to other websites

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites including if you access them using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

(Where applicable – e.g. are you using Cloud based services? If so do you know where the servers are located?) Transferring your information outside of the EU

As part of the services offered to you through this website, the information which you provide to us may be transferred to countries outside the European Union ("EU"). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EU. These countries may not have equivalent data protection laws to the EU. By submitting your personal data, you're agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

If you use our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

(Only if applicable) Website recording

Our web site may also use web site recording services which may record mouse clicks, mouse movements, page scrolling and any text keyed into website forms. The information collected does not include bank details or any sensitive personal data. Data collected in such a fashion is for our internal use only. The information collected is used to improve our website usability and is stored and used for aggregated and statistical reporting.

Review of this Policy

We keep this Policy under regular review. This Policy was last updated _____ (add date)