

## BACKGROUND:

<<insert business name>> understands that it is important to you and that you care about how your personal data is collected, stored and used. <<insert business name>> respects and values the privacy of everyone who visits this website, and will only collect and use personal data in the way described here, and in a way that is consistent with [our] OR [my] obligations under the law.

Please read this Privacy Policy carefully to ensure you understand it. Your acceptance of this Privacy Policy is requested <<insert acceptance is requested>>.

### 1. Information About [Us] OR [Me]

[Our] OR [My] Site is [owned/operated by] <<insert business name>>, a <<insert business type, e.g. limited company, sole trader etc.>> [registered in England under company number <<insert company number>>].

[Registered address: <<insert registered address>>].

[Main trading address: <<insert main trading address>>].

[VAT number: <<insert VAT number>>].

[Data Protection Officer: <<insert Data Protection Officer>>].

Email address: <<insert email address>>.

Telephone number: <<insert telephone number>>.

Postal address: <<insert postal address>>.

[Representative: <<insert representative>>].

Email address: <<insert email address>>.

Telephone number: <<insert telephone number>>.

Postal address: <<insert postal address>>.

[[We are] OR [I am] regulated by <<insert name of regulator(s)>>].

[[We are] OR [I am] a member of <<insert name of association(s) etc.>>].

[<<insert further information>>]

### 2. What Does This Policy Cover?

This Privacy Policy applies to all personal data that <<insert business name>> OR [My] Site. [Our] OR [My] Site may contain links to other websites and <<insert business name>> OR [I] have no control over how your data is collected, stored and used on these websites and [we] OR [I] advise you to check the privacy policy of these websites before providing any data to them.

### 3. What Is Personal Data?

Personal data is defined in the Data Protection Act 2018 (collectively, "the Data Protection Act") as 'any information relating to an identifiable person who can be identified in particular by reference to an identifier'.

Personal data is, in simple terms, any information that identifies you. Personal data can include details such as your name and contact details, but it also covers information such as identification numbers, electronic location data, and

#### 4. What Are My Rights?

Under the Data Protection Act 1998, you have the following rights, which [we] OR [I] will always work to uphold:

- The right to be informed about the collection and use of your personal data. This means we will tell you everything you need to know, but you can also ask questions using the details in Part 12.
- The right to access your personal data. We will tell you how to do this and provide you with a copy of the data.
- The right to have your personal data corrected if it is inaccurate or deleted if it is no longer needed. Please contact [us] OR [me] using the details in Part 12.
- The right to be forgotten or otherwise dispose of your personal data. Please contact [us] OR [me] using the details in Part 12.
- The right to restrict the processing of your personal data.
- The right to object to the processing of your personal data for a particular purpose or purposes.
- The right to withdraw your consent at any time. If you are relying on your consent as the basis for processing your personal data, you are free to withdraw that consent at any time.
- The right to data portability. If you have provided personal data to [us] OR [me] and we are using it with your consent or for the performance of a contract, you can ask us to provide a copy of that personal data to re-use with another service or for your own purposes.
- Rights relating to automated decision making and profiling. [[We] OR [I] do not use your personal data for automated decision making or profiling.]

For more information about your rights as outlined above, please see Part 12.

It is important that your personal data [we] OR [I] keep accurate and up-to-date. If any of the details provided are incorrect, please keep [us] OR [me] informed as long as [we] OR [I] are processing your data.

Further information about your rights can be obtained from the Information Commissioner's Office or your local Data Protection Officer.

If you have any cause for concern about the way we use your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. [We] OR [I] would welcome your concerns [ourselves] OR [myself], however, so please contact us first, using the details in Part 12.

about you that enables you to be identified. Personal data can include details such as your name and contact details, but it also covers information such as identification numbers, electronic location data, and

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a) The right to be informed about the collection and use of your personal data. This means we will tell you everything you need to know, but you can also ask questions using the details in Part 12.

b) The right to access your personal data. We will tell you how to do this and provide you with a copy of the data.

c) The right to have your personal data corrected if it is inaccurate or deleted if it is no longer needed. Please contact [us] OR [me] using the details in Part 12.

d) The right to be forgotten or otherwise dispose of your personal data. Please contact [us] OR [me] using the details in Part 12.

e) The right to restrict the processing of your personal data.

f) The right to object to the processing of your personal data for a particular purpose or purposes.

g) The right to withdraw your consent at any time. If you are relying on your consent as the basis for processing your personal data, you are free to withdraw that consent at any time.

h) The right to data portability. If you have provided personal data to [us] OR [me] and we are using it with your consent or for the performance of a contract, you can ask us to provide a copy of that personal data to re-use with another service or for your own purposes.

i) Rights relating to automated decision making and profiling. [[We] OR [I] do not use your personal data for automated decision making or profiling.]

For more information about your rights as outlined above, please see Part 12.

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If you have any cause for concern about the way we use your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. [We] OR [I] would welcome your concerns [ourselves] OR [myself], however, so please contact us first, using the details in Part 12.

## 5. What Data Do You Collect

Depending upon your use of the Site, we may collect some or all of the personal data set out in the table below, using the methods also set out in the table below. We do not collect any 'special category' or 'sensitive' personal data relating to children AND/OR [data relating to children's criminal offences].

Data Collected	OR [I] Collect the Data
[Identity Information including <<insert details of what is collected, e.g. name, title, date of birth, gender>>.]	[<<insert details of method of collection and/or use>>.]
[Contact information including <<insert details of what is collected, e.g. address, email address, telephone number>>.]	[<<insert details of method of collection and/or use>>.]
[Business information including <<insert details of what is collected, e.g. business name, profession>>.]	[<<insert details of method of collection and/or use>>.]
[Payment information including <<insert details of what is collected, e.g. card details, bank account numbers>>.]	[<<insert details of method of collection and/or use>>.]
[Profile information including <<insert details of what is collected, e.g. preferences, interests, details, purchase history>>.]	[<<insert details of method of collection and/or use>>.]
[Technical information including <<insert details of what is collected, e.g. IP address, browser type, version, operating system>>.]	[<<insert details of method of collection and/or use>>.]
[Data from third parties including <<insert details of what is collected, e.g. technical information, contact information, profile information>>.]	[<<insert details of method of collection and/or use>>.]
[<<add further information as required>>.]	

## 6. How Do You Use My Personal Data

Under the Data Protection Act 1998, we must always have a lawful basis for using personal data. This means we must be able to show how we use your personal data, and on what basis we are doing so:

What [We] OR [I] Do	Why We Do It	[Our] OR [My] Lawful Basis
[Registering you on [Our] OR [My] Site.]	<<insert details of why we do this>>	<<insert lawful basis (if "legitimate interests", state what the legitimate interest(s) is or are>>.
[Administering [Our] OR [My] Site.]	<<insert details of why we do this>>	<<insert lawful basis (if "legitimate interests", state what the legitimate interest(s) is or are>>.

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Method(s) may be used:

Individual decision-making including the

legal basis for using that data, and

o <<add further details>>.]

• [The following automatic processing will take place:

o <<insert simple description of the processing which you rely on, including the legal basis on which you rely, the reason(s) for using that data, and the intended use of that data>>.]

o <<add further details>>.]

[We] OR [I] will only use your personal data for the purpose(s) for which it was originally collected unless we believe that another purpose is compatible with that or those purposes. If [we] OR [us] OR [me] to explain how we use your personal data in this way and you wish to opt out of this, please contact [us] OR [me] using the details below.

If [we] OR [I] need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, [we] OR [I] will contact [us] OR [me] to do so.

In some circumstances, where we are required by law, [we] OR [I] may process your personal data without your consent. This will only be done within the bounds of the Data Protection Act 1998 and your legal rights.

## 7. How Long Will You Keep My Personal Data?

[We] OR [I] will not keep your personal data for longer than is necessary in light of the reason(s) for which it was collected. If your personal data will therefore be kept for a fixed period, the following factors will be used to determine how long we will keep it for:

Type of Data	[We] OR [I] Keep It
[Identity Information including <<insert details of the personal data collected, e.g. name, title, date of birth, gender>>.]	Details of retention period, or how long it will be determined if no fixed period is specified.
[Contact information including <<insert details of the personal data collected, e.g. address, email address, telephone number>>.]	Details of retention period, or how long it will be determined if no fixed period is specified.
[Business information including <<insert details of the personal data collected, e.g. business name, business address, profession>>.]	Details of retention period, or how long it will be determined if no fixed period is specified.
[Payment information including <<insert details of the personal data collected, e.g. card details, bank account numbers>>.]	Details of retention period, or how long it will be determined if no fixed period is specified.
[Profile information including <<insert details of the personal data collected, e.g. preferences and interests, username and password, browsing history>>.]	Details of retention period, or how long it will be determined if no fixed period is specified.
[Technical information including <<insert details of the personal data collected, e.g. IP address, device ID, cookies>>.]	Details of retention period, or how long it will be determined if no fixed period is specified.

collected, e.g. IP address, browser version, operating system>>.]

[<<add further information as required>>]

will be determined if no fixed

## 8. How and Where Do You Store Personal Data?

[[We] OR [I] will [only store personal data] in the UK. This means that your personal data is protected under the Data Protection Legislation.]

### AND/OR

[[We] OR [I] will [only store personal data] within the European Economic Area (EEA) member states, plus Norway, Iceland and Liechtenstein. This means that your personal data will be fully protected by the standards by law. Transfers of personal data without additional safeguards are not permitted.

### AND/OR

[[We] OR [I] [may] store some of your personal data outside of the UK. These are known as "third countries". We will ensure that your personal data is protected within the UK and under the Data Protection Legislation.

[We ensure that your personal data is protected under binding corporate rules. Binding corporate rules are a set of internal rules required to follow when processing personal data. For further information, please refer to the [Information Commissioner's Office](#) website.]

### OR

[[We] OR [I] will only store some of your personal data in or to countries that are deemed to provide an adequate level of protection for personal data. For further information about adequacy, please refer to the [Information Commissioner's Office](#) website.]

### OR

[[We] OR [I] will use special measures to ensure that your personal data protection is at least equivalent to that in the UK. For further information, please refer to the [Information Commissioner's Office](#) website.]

Please contact [us] OR [me] for more information about the particular data protection measures we are taking when transferring your personal data.

The security of your personal data, [we] OR [I] take a number of measures to ensure that your personal data is protected, including the following:

- limiting access to your personal data to only those who need to know and other third parties who are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful disclosure of, or access to, your personal data) including notifying the Information Commissioner's Office where [we] or [I] are required to do so;
- <<describe specific measures>>

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[[We] OR [I] will [only store some of your personal data] within the European Economic Area (EEA) member states, plus Norway, Iceland and Liechtenstein. This means that your personal data will be fully protected by the standards by law. Transfers of personal data without additional safeguards are not permitted.

[[We] OR [I] [may] store some of your personal data outside of the UK. These are known as "third countries". We will ensure that your personal data is protected within the UK and under the Data Protection Legislation.

[We ensure that your personal data is protected under binding corporate rules. Binding corporate rules are a set of internal rules required to follow when processing personal data. For further information, please refer to the [Information Commissioner's Office](#) website.]

[[We] OR [I] will only store some of your personal data in or to countries that are deemed to provide an adequate level of protection for personal data. For further information about adequacy, please refer to the [Information Commissioner's Office](#) website.]

[[We] OR [I] will use special measures to ensure that your personal data protection is at least equivalent to that in the UK. For further information, please refer to the [Information Commissioner's Office](#) website.]

Please contact [us] OR [me] for more information about the particular data protection measures we are taking when transferring your personal data.

The security of your personal data, [we] OR [me], and to protect your personal data, [we] OR [I] take a number of measures, including the following:

• limiting access to your personal data to only those who need to know and other third parties who are subject to duties of confidentiality;

• procedures for dealing with data breaches (the accidental or unlawful disclosure of, or access to, your personal data) including notifying the Information Commissioner's Office where [we] or [I] are required to do so;

9. **Do You Share My Personal Data?**

[[We] OR [I] will not share your personal data with any third parties for any purposes, subject to the following:

[If [we] OR [I] sell, transfer or otherwise dispose of our business or assets, your personal data may be transferred to the new owner. Any new owner of [our] OR [my] business may continue to use your personal data in the same way(s) that [we] OR [I] have used it, as specified in this Privacy Policy.]

In some limited circumstances, we may be legally required to share certain personal data, which might include [we] OR [I am] involved in legal proceedings or complying with a court order, or the instructions of a government authority.]

**OR**

[[[We] OR [I] may share your personal data with other companies in [our] OR [my] group for <<insert description of purpose>>] s includes [subsidiaries] AND/OR [other companies].]]

[[We] OR [I] may sometimes allow third parties to supply certain [products] AND/OR [services] to you.]

Recipient	Activity Category		Location
<<Insert type of recipient and (optionally) name (also state whether recipient is a data controller or a data processor)>>.	<<Insert short description of activity or activities (if applicable) (where appropriate, state out)>>.	Business or other activity (where appropriate, state out)>>.	<<Insert country and (optionally) address or other contact details>>.
[<<add further recipients as required>>]			

If any of your personal data is shared with a third party, as described above, [we] OR [I] will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights and obligations under the law, as explained in Part 8.]

[If any personal data is transferred to a third party, [we] OR [I] will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK, as explained in the Data Protection Legislation, as explained above in Part 8.]

[If [we] OR [I] sell, transfer or otherwise dispose of our business or assets, your personal data may be transferred to the new owner. Any new owner of [our] OR [my] business may continue to use your personal data in the same way(s) that [we] OR [I] have used it, as specified in this Privacy Policy.]

In some limited circumstances, we may be legally required to share certain personal data, which might include [we] OR [I am] involved in legal proceedings or complying with a court order, or the instructions of a government authority.]

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10. **Can I Withhold Information?**

You may access [certain a  
data at all. [However, to u  
Site you may be required to

Site without providing any personal  
tions available on [Our] OR [My]  
collection of certain data.]

11. **How Can I Access My Personal Data?**

If you want to know what p  
OR [me] for details of the  
personal data is held). This

have about you, you can ask [us]  
or a copy of it (where any such  
ccess request".

All subject access requests  
addresses shown in Part  
Access Request Form is a  
but it is the easiest way to  
respond to your request as

ing and sent to the email or postal  
sy as possible for you, a Subject  
You do not have to use this form,  
thing [we] OR [I] need to know to

There is not normally any  
'manifestly unfounded or e  
fee may be charged to cov

ccess request. If your request is  
if you make repetitive requests) a  
trative costs in responding.

[We] OR [I] will respond to  
than one month)>> and,  
Normally, [we] OR [I] aim  
personal data within that ti  
more complex, more time r  
date [we] OR [I] receive yo  
progress.

request within [<<insert period (less  
than] one month of receiving it.  
esponse, including a copy of your  
ever, particularly if your request is  
maximum of three months from the  
ept fully informed of [our] OR [my]

12. **How Do I Contact You?**

To contact [us] OR [me]  
protection, including to m  
details [(for the attention of

with your personal data and data  
request, please use the following

Email address: <<in

Telephone number:

per>>.

Postal Address: <<i

13. **Changes to this Privacy Policy**

[We] OR [I] may change  
necessary, for example, if  
business in a way that affe

rom time to time. This may be  
[we] OR [I] change [our] OR [my]  
on.

Any changes will be imm  
deemed to have accepted  
OR [My] Site following the  
page regularly to keep up-  
date>>.

] OR [My] Site and you will be  
y Policy on your first use of [Our]  
] recommend that you check this  
olicy was last updated on <<insert

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