**Privacy Policy**

This Privacy Policy sets out how we, Positive Press Ltd Incorporating Jenny Mosley Consultancies, collect, store and use information about you when you use or interact with our website [www.circle-time.co.uk](http://www.circle-time.co.uk) (our **website**) and where we otherwise obtain or collect information about you. This Privacy Policy is effective from 15th May 2018.

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**Summary**

This section summarises how we obtain, store and use information about you. It is intended to provide a very general overview only. **It is not complete in and of itself and it must be read in conjunction with the corresponding full sections of this Privacy Policy.**

* **How we collect or obtain information about you**:
	+ when you provide it to us (e.g. by contacting us, placing an order on our website, signing up for a newsletter, signing up for a catalogue, completing a website enquiry form, completing a website training enquiry form, giving us your email address if you apply to download a freebie, writing down your contact details after a training event or during preparation for such an event, phoning or faxing us or making any in-person or electronic training or resource enquiry. We have a list of schools from a Schools Mailing mailing house that we use – but these are school email addresses and not personalised and are therefore business-to-business contacts.)
	+ from your use of our website, using cookies, and
	+ occasionally, from third parties like the schools mailing website for school business contacts.
* **Information we collect**: Depending upon the nature of your enquiry and the information that you voluntarily provide for us, could include name, email address, school, school address, home address if you have made a personal enquiry, telephone contact number, mobile contact number, your type of role and school details. We will take notes on the nature of your enquiry to help us find the right solution (training or resources) to answer your enquiry/questions.
* **How we use your information**: for administrative and business purposes (particularly to contact you, process your order, find business solutions including training options, resource options, consultancy quotes, suggestions, options and relevant marketing details as appropriate. Your data may be used anonymously to analyse the use of our website.)
* **Disclosure of your information to third parties**: only to the extent necessary to run our business directly or to fulfil your orders from us. For instance, if you order a sign, we would give your name and postal address to the signwriting company that makes the sign so that they can send it to you.
* **Do we sell your information to third parties (other than in the course of a business sale or purchase or similar event)**: No. We never do this.
* **How long we retain your information**: for no longer than necessary, taking into account any legal obligations we have (e.g. to maintain records for tax purposes), any other legal basis we have for using your information (e.g. your consent, performance of a contract with you or our legitimate interests as a business). For specific retention periods in relation to certain information which we collect from you, please see the main section below entitled How long we retain your information.
* **How we secure your information**: using appropriate technical and organisational measures such as collecting only the data we need, storing it on a locked-down server or if on paper, in an alarmed, locked building in a safe residential area. We use SSL technology on our website and have password-protected access to our computer system. Our computer systems have advanced security systems installed by a professional company that safeguards all our information.
* **Use of cookies and similar technologies**: We use cookies [and similar information-gathering technologies] on our website. For more information, please visit our cookies policy here: Cookies Policy
* **Transfers of your information outside the European Economic Area**: We would only transfer your information outside the European Economic Area if we were required to do so by law.
* **Use of automated decision making and profiling**: we do not use automated decision making and profiling.
* **Your rights in relation to your information**
	+ to access your information and to receive information about its use
	+ to have your information corrected and/or completed
	+ to have your information deleted
	+ to restrict the use of your information
	+ to receive your information in a portable format
	+ to object to the use of your information
	+ to withdraw your consent to the use of your information
	+ to complain to a supervisory authority
* **Sensitive personal information**: we do not knowingly or intentionally collect what is commonly referred to as ‘sensitive personal information’. Please do not submit sensitive personal information about you to us. For more information, please see the main section below entitled Sensitive Personal Information.

**Our details**

The data controller in respect of our website is Positive Press Ltd incorporating Jenny Mosley Consultancies. You can contact the company by emailing Circletime@jennymosley.co.uk.

**Information we collect when you visit our website**

We collect and use information from website visitors in accordance with this section and the section entitled Disclosure and additional uses of your information.

**Web server log information**

We use a third party server to host our website called: Synthesis Hosting, based in London (see details and privacy policy here: <http://websynthesis.com/>)

Use of website server log information for IT security purposes

We do not access log data from our website server but it is likely that our third party hosting provider will access, collet and store server logs to ensure network and IT security and so that the server and website remain uncompromised. This includes analysing log files to help identify and prevent unauthorised access to our network, the distribution of malicious code, denial of services attacks and other cyber attacks, by detecting unusual or suspicious activity.

**Legal basis for processing**:compliance with a legal obligation to which we are subject (Article 6(1)(c) of the General Data Protection Regulation).
**Legal obligation**: we have a legal obligation to implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk of our processing of information about individuals. Recording access to our website using server log files is such a measure.

**Legal basis for processing**:our and Synthesis Hosting’s legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

**Legitimate interests**: we and our third party hosting provider have a legitimate interest in using your information for the purposes of ensuring network and information security.

Use of website server log information to analyse website use and improve our website

We use the information collected by our website server logs and Google Analytics to analyse how our website users interact with our website and its features. For example, we analyse the number of visits and unique visitors we receive, times and dates of visits, the location of the visit, the operating system and browser used to help us understand and respond to customer need.

We use the information gathered from the analysis of this information to improve our website. For example, we use the information gathered to change the information, content and structure of our website and individual pages based according to what users are engaging most with and the duration of time spent on particular pages on our website.]

**Legal basis for processing**:ourlegitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
**Legitimate interest**: improving our website for our website users and getting to know our website users’ preferences so our website can better meet their needs and desires.]

**Cookies and similar technologies**

Cookies are data files which are sent from a website to a browser to record information about users for various purposes.

We use cookies [and similar technologies] on our website, including essential, functional, analytical and targeting cookies and Google Analytics technology. Please see our Cookies Policy here: XXXX

You can reject some or all of the cookies we use on or via our website by changing your browser settings, but doing so can impair your ability to use our website or some or all of its features. For further information about cookies, including how to change your browser settings, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org) or see our cookies policy.

**Information we collect when you contact us**

We collect and use information from individuals who contact us in accordance with this section and the section entitled Disclosure and additional uses of your information.

**Email**

When you send an email to the email address displayed on our website we collect your email address and any other information you provide in that email (such as your name, telephone number and the information contained in any signature block in your email).

**Legal basis for processing**:ourlegitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
**Legitimate interest(s)**: responding to enquiries and messages we receive and keeping records of correspondence.

**Legal basis for processing**: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).
**Reason why necessary to perform a contract**: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

Transfer and storage of your information

Depending upon our current marketing techniques, we may use a third party email provider to store emails and/or information that you send us, like MailChimp or Graphic Mail.

**Contact form**

When you contact us using our contact form, we collect

Your name, School name, age group of education, email address, phone number, mobile, address, your role, what type of training you are looking for, anything else you would like to tell us free text box.

If you request a quote for a sign, we ask for your name, email address, phone number, product quantity and a free text box to write to us.

If you email us, you may give us information that helps up to answer your enquiry and helps us tailor our response to your needs and wishes. If you write to us or fax us or phone to speak to us or leave a message the same applies.

**Legal basis for processing**:ourlegitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
**Legitimate interest(s)**: responding to enquiries and messages we receive and keeping records of correspondence.

**Legal basis for processing**: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).
**Reason why necessary to perform a contract**: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

Transfer and storage of your information

Messages you send to us and information we keep is stored within the European Economic area on our website server or on our local office systems server.

**Phone**

When you contact us by phone, we collect your phone number and any information provide to us during your conversation with us. We do not ever usually record phonecalls apart from answer machine messages. We may take notes in order to fulfil your requests. Any notes will be filed or destroyed according to usage.

**Legal basis for processing**:ourlegitimate interests (Article 6(1)(f) of the General Data Protection Regulation)
**Legitimate interest(s)**: responding to enquiries and messages we receive and keeping records of correspondence.

**Legal basis for processing**: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).
**Reason why necessary to perform a contract**: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

**Post**

If you contact us by post, we will collect any information you provide to us in any postal communications you send us. This will be filed or destroyed according to usage.

**Legal basis for processing**:ourlegitimate interests (Article 6(1)(f) of the General Data Protection Regulation)
**Legitimate interest(s)**: responding to enquiries and messages we receive and keeping records of correspondence.

**Legal basis for processing**: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).
**Reason why necessary to perform a contract**: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

**Information we collect when you interact with our website**

We collect and use information from individuals who interact with particular features of our website in accordance with this section and the section entitled Disclosure and additional uses of your information.

**News and Special Offers Subscription, Freebies Signup and Catalogue Signup**

When you sign up for our News and Special Offers or to receive a Freebie, and marketing materials and special offers, we collect your name and email address. If you sign up to receive a catalogue, we will collect your name and postal address in order to send you the catalogue. Your name and address will be saved on our SAGE system and we may email further information that is related to your enquiry.

**Legal basis for processing**:yourconsent (Article 6(1)(a) of the General Data Protection Regulation).
**Consent**: you give your consent to us sending you our e-newsletter by signing up to receive it using the steps described above.

Transfer and storage of your information

We use either in-house emailing currently or MailChimp or a similar emailing system in future (which would be added to this policy as appropriate) to send out emails and marketing materials. Mail Chimp Privacy Policy on their website.

Information you submit to subscribe for our information and marketing materials will be stored within the European Economic Area on our own servers in England and if we use Mailchimp then data will be stored according to the terms and conditions of Mail Chimp website and systems (for more information please see [www.mailchimp](http://www.mailchimp) – this information may be stored outside of the EU economic area. Using Mailchimp will mean using technologies to allow us to measure delivery rates, open rates, click through rates etc.

For more information about Mail Chimp and where they store their data and whether they use web beacons, please see their privacy policy on the Mail Chimp website.

**Registering on our website**

When you register and create an account on our website, we collect the following information: name, address, email address, phone number and any other information you provide to us when you complete the registration form including any optional information.

If you do not provide the mandatory information required by the registration form, you will not be able to register or create an account on our website.

 [**Legal basis for processing**:necessary to perform a contract [or to take steps at your request prior to entering into a contract](Article 6(1)(b) of the General Data Protection Regulation).
**Reason why necessary to perform a contract**: creating an account on our website is necessary to allow you to access the goods and services you have purchased from us]

**OR**

[**Legal basis for processing**:our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
**Legitimate interest**: registering and administering accounts on our website to [*insert purpose* *e.g. to provide access to content*] [and facilitate the running and operation of our business.]]

Transfer and storage of your information

Information you submit to us via the registration form on our website will be stored within the European Economic Area on our own server although it may be used on Mailchimp – please see their Privacy Policy

**Information we collect when you place an order on our website, by phone, by fax or in person**

We collect and use information from individuals who place an order on our website in accordance with this section and the section entitled Disclosure and additional uses of your information.

**Information collected when you place an order**

Mandatory information

When you place an order for goods or services on our website, we collect your name, email address, billing address, shipping address, company name (if applicable), role, VAT number (if applicable), *any other mandatory information you collect from customers at checkout.* If you do not provide this information, you will not be able to purchase goods or services from us on our website or enter into a contract with us.

**Legal basis for processing**:necessary to perform a contract (Article 6(1)(b) of the General Data Protection Regulation).
**Reason why necessary to perform a contract**: we need the mandatory information collected by our checkout form to establish who the contract is with and to contact you to fulfil our obligations under the contract, including sending you receipts and order confirmations.

[**Legal basis for processing**: compliance with a legal obligation (Article 6(1)(c) of the General Data Protection Regulation).
**Legal obligation**: we have a legal obligation to issue you with an invoice for the goods and services you purchase from us where you are VAT registered and we require the mandatory information collected by our checkout form for this purpose. We also have a legal obligation to keep accounting records, including records of transactions]

Optional information

We also collect optional information from you, such as your phone number, alternative contact details, where you heard about us and what products, resources or training you are interested in. We never offer details of third party goods or sell your information to other companies.

[If you do not supply the optional information requested at checkout, you are unlikely to be able to make your purchase – but please phone to see if an alternative way can be found

[**Legal basis for processing:** our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
**Legitimate interests**:To help us tailor the resources, information or training that you are enquiring about.

**AND/OR**

**Legal basis for processing**:yourconsent (Article 6(1)(a) of the General Data Protection Regulation).
**Legitimate interests**:you consent to us processing any optional information you provide by submitting that information to us.]

**Processing your payment**

After you place an order on our website you will need to make payment for the goods or services you have ordered. In order to process your payment we use SAGE, SAGEPAY and PayPal and your payment will be processed by SAGE, SAGEPAY and/or PayPal via a payment gateway

SAGE and PayPal collect, use and process your information, including payment information, in accordance with their own privacy policies – please see their individual websites to access these.

 Transfer and storage of your information

We believe that SAGE and PayPal are located in the European Economic Area and that information relating to the processing of your payment is stored within the European Economic Area.

**Legal basis for processing**:necessary to perform a contract (Article 6(1)(b) of the General Data Protection Regulation).
**Reason why necessary to perform a contract**: to fulfil your contractual obligation to pay for the goods or services you have ordered from us.

**Marketing communications**

At various places on the website you have the option of signing up to receive marketing communications from us – for similar goods and services only. Customers and trainees may also be sent marketing communications unless they unsubscribe.

You can opt-out from receiving marketing communications in relation to our goods and which are similar to those which you purchase from us, by emailing us at any stage or telephoning to ask to unsubscribe from either resources marketing information or courses marketing information.

We will send you marketing communications in relation to similar goods and services if you do not opt out from receiving them.

**Legal basis for processing**:ourlegitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
**Legitimate interests**: direct marketing and advertising our products and services.]

Transfer and storage of your information

We currently use our own inhouse email programme to email out, and store all contact data on spreadsheets on our own server in Wiltshire, England, and this server is password protected and cyber-protected as our our PCs. If at some point in future we use MailChimp, we will adhere to their Privacy Policy and Terms and Conditions – please see the Mailchimp website.

 Information you submit to subscribe for our e-newsletter will be stored within the European Economic Area on our own server or possibly outside the European Economic Area if we are using Mail Chimp – for further information about this please see Mail Chimp website.

 [Our goods and services]

You can opt in to receiving marketing communications from us in relation to our goods and services by email, phone, post or fax or by completing a contact form on our website.

We will send you marketing communications in relation to our goods and services only if you opt-in to receive them. However, if you are a school (ie. Business to Business customer) or a legitimate customer or trainee we may email you as you have a legitimate interest in our goods and services.

**Legal basis for processing**:consent (Article 6(1)(a) of the General Data Protection Regulation).
**Consent**: you give your consent to us sending you information about our goods and services by signing up to receive such information in accordance with the steps described above.

**Legal basis for processing**:ourlegitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
**Legitimate interests**: direct marketing and advertising our products and services.]

Transfer and storage of your information

We usually use our own in house emailing system, but occasionally and maybe more in the future we may use Mail Chimp.

Information you submit to subscribe for our marketing materials will be stored within **OR** outside the European Economic Area on our own server and maybe on MailChimp’s mailing list provider’s] servers – please see their website for details about safeguarding data.

**Information collected or obtained from third parties**

This section sets out how we obtain or collect information about you from third parties.

**Information received from third parties**

Generally, we do not receive information about you from third parties. The third parties from which we about you will generally include websites and school mailing houses (for business mailings).

It is also possible that third parties with whom we have had no prior contact may provide us with information about you.

Information we obtain from third parties will generally be your name and contact details, but will include any additional information about you which they provide to us.

**Legal basis for processing**:necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).
**Reason why necessary to perform a contract**: where a third party has passed on information about you to us (such as your name and email address) in order for us to provide services to you, we will process your information in order to take steps at your request to enter into a contract with you and perform a contract with you (as the case may be).

**Legal basis for processing**:consent (Article 6(1)(a) of the General Data Protection Regulation).
**Consent**: where you have asked that a third party to share information about you with us and the purpose of sharing that information is not related to the performance of a contract or services by us to you, we will process your information on the basis of your consent, which you give by asking the third party in question to pass on your information to us.

**Legal basis for processing**:our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
**Legitimate interests**: where a third party has shared information about you with us and you have not consented to the sharing of that information, we will have a legitimate interest in processing that information in certain circumstances.

For example, we would have a legitimate interest in processing your information to perform our obligations under a sub-contract with the third party, where the third party has the main contract with you. Our legitimate interest is the performance of our obligations under our sub-contract.

Similarly, third parties may pass on information about you to us if you have infringed or potentially infringed any of our legal rights. In this case, we will have a legitimate interest in processing that information to investigate and pursue any such potential infringement.

**Where we receive information about you in error**

If we receive information about you from a third party in error and/or we do not have a legal basis for processing that information, we will delete your information.

**Information obtained by us from third parties**

In certain circumstances (for example, to verify the information we hold about you or obtain missing information we require to provide you with a service) we will obtain information about you from certain publicly accessible sources, both EU and non-EU, such as OFSTED reports, Companies House, Online databases, websites including your own and schools mailing companies.

**Legal basis for processing**:necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).
**Reason why necessary to perform a contract**: where you have entered into a contract or requested that we enter into a contract with you, in certain circumstances, we will obtain information about you from public sources in order to enable us to understand your business and provide services to you or services to a sufficient standard.

For example, we would obtain and/or verify your email address from your website or from a directory where you ask us to send you information by email but we do not possess the information or we need to confirm that we have recorded your email address correctly.

**Legal basis for processing**:our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
**Legitimate interests**: in certain circumstances, we will have a legitimate interest in obtaining information about you from public and private sources. For example, if you have infringed or we suspect that you have infringed any of our legal rights, we will have a legitimate interest in obtaining and processing information about you from such sources in order to investigate and pursue any suspected or potential infringement.

[**Legal basis for processing**:consent (Article 6(1)(a) of the General Data Protection Regulation).
**Consent**: we may obtain information from third parties, such as data brokers, where you have consented to them sharing information with us by [*insert method by which individual consent e.g. ticking a box stating that you would like your information to be share with us*.]]

**Our use of profiling**

We use profiling on our website. We do not consider that this has any legal effect on you or similarly significantly affects you.

You have the right to object to our use of profiling described in this section. You can do that by opting-out of cookies and similar technologies. If you do not want us to process your actual IP address (usually the IP address assigned to you by your Internet Service Provider) when you visit our website, you can use a Virtual Private Network (VPN) or a free service such as Tor.

You can find out more about our use of cookies and similar technologies (including the legal basis on which we use them) and how to opt out from them in our cookies policy, which is available on our website.

**Profiling**

Profiling is any form of automated processing of your information to evaluate personal aspects about you.

Use of profiling for web analytics

Our web analytics service, Google Analytics, collects and uses information such as your location (based on your IP address) and your behaviour (based on cookies) when you access our website (such as the pages you visit and what you click on) and how long you may stay on a particular page. Information collected about you, once collected is anonymised and stored on an aggregate basis.

**Logic involved**: by automatically analysing and categorising information such as the location (based on IP address) as well as the behaviour and devices of visitors to our website (using cookies), we are able to gain a better understanding of what our website visitors want (in terms of the content of our website and our products), how to improve our website and how to advertise and market our services to them.

**Significance and envisaged consequences**: cookies will be used to track and store information about your behaviour and device on our website (unless you have opted out from receiving such cookies) and your location will be analysed based on your IP address. [We may target advertisements based on the level of interest we receive from certain visitors and their behaviour on our website.]

**Legal basis for processing**:*legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).*]]

[**Legitimate interest**: We use legitimate interests to work out which sections of the website, for example, are read most and which pages would benefit from SEO or from improvement.

**Disclosure and additional uses of your information**

This section sets out the circumstances in which we will disclose information about you to third parties and any additional purposes for which we use your information.

**Disclosure of your information to service providers**

We use a number of third parties to provide us with services which are necessary to run our business or to assist us with running our business and who may process your information for us on our behalf. These include the following:

* Telephone provider(s), including BT and Virgin, Tesco Mobile, O2 and others. Their privacy policies are available on their own websites.
* Email provider(s), including Outlook. Their privacy policy can be found on their website.
* IT service provider(s), including Cifer Data Systems. Their Terms and Conditions are available on their website: www.cifer.org.uk
* Web developer(s), including Graphics Bite. See: https://www.graphicsbite.co.uk/
* Hosting provider(s), including Synthesis Hosting. See: https://websynthesis.com/.
* PayPal.

We believe our third party service providers are located in the UK.

Your information will be shared with these service providers where necessary to provide you with the service you have requested, whether that is accessing our website or ordering goods and services from us.

We may not be displaying the identities of all of our service providers publicly by name for security and competitive reasons. If you would like further information about the identities of our service providers, however, please contact us directly and we will provide you with such information where you have a legitimate reason for requesting it (where we have shared your information with such service providers, for example).

**Legal basis for processing**:legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
**Legitimate interest relied on**: where we share your information with these third parties in a context other than where is necessary to perform a contract (or take steps at your request to do so), we will share your information with such third parties in order to allow us to run and manage our business efficiently.

**Legal basis for processing**:necessary to perform a contract and/or to take steps at your request prior to entering into a contract (Article 6(1)(b) of the General Data Protection Regulation).
**Reason why necessary to perform a contract**: we may need to share information with our service providers to enable us to perform our obligations under that contract or to take the steps you have requested before we enter into a contract with you.

**Disclosure of your information to other third parties**

We disclose your information to other third parties in specific circumstances, as set out below.

Providing information to third parties such as Google Inc,

Google collects information through our use of Google Analytics on our website. Google uses this information, including IP addresses and information from cookies, for a number of purposes, such as improving its Google Analytics service. Information is shared with Google on an aggregated and anonymised basis. To find out more about what information Google collects, how it uses this information and how to control the information sent to Google, please see the following page: <https://www.google.com/policies/privacy/partners/>

**Legal basis for processing**:ourlegitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
**Legitimate interest(s)**: meeting our contractual obligations to Google under our Google Analytics Terms of Service (<https://www.google.com/analytics/terms/us.html>)

You can opt out of Google Analytics by installing the browser plugin here: <https://tools.google.com/dlpage/gaoptout>

Transfer and storage of your information

Information collected by Google Analytics is stored outside the European Economic Area on Google’s servers in the United States of America.

For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.]

Sharing your information with third parties, which are either related to or associated with the running of our business, where it is necessary for us to do so. These third parties may include accountants, advisors, affiliates, business partners, independent contractors, and insurers. If you require any further information about any third parties please contact us for further details.

**Legal basis for processing**:ourlegitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
**Legitimate interest**: running and managing our business efficiently.

 **[Legal basis for processing**:our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).  **Legitimate interest**:running and managing our business effectively.

**AND/OR**

**Legal basis for processing**:necessary to perform a contract [or to take steps at your request prior to entering into a contract](Article 6(1)(b) of the General Data Protection Regulation). **Reason why necessary to perform a contract**:we need to share your information with other companies in order to be able to meet our contractual obligations to you [or to take steps at your request prior to entering a contract.], for example because of the services or information you have requested.

[We do not display the identities of [all of] the other third parties we may share information with by name for security and competitive reasons. If you would like further information about the identities of such third parties, however, please contact us directly [via our contact form] or [by email] and we will provide you with such information where you have a legitimate reason for requesting it (where we have shared your information with such third parties, for example).]

Sharing your information with a prospective or actual purchaser or seller in the context of a business or asset sale or acquisition by us, a merger or similar business combination event, whether actual or potential.

**Legal basis for processing**:legitimate interests (Article 6(1)(f) of the General Data Protection Regulation). **Legitimate interest(s)**:sharing your information with a prospective purchaser, seller or similar person in order to allow such a transaction to take place.

**Disclosure and use of your information for legal reasons**

Indicating possible criminal acts or threats to public security to a competent authority

If we suspect that criminal or potential criminal conduct has been occurred, we will in certain circumstances need to contact an appropriate authority, such as the police. This could be the case, for instance, if we suspect that we fraud or a cyber crime has been committed or if we receive threats or malicious communications towards us or third parties.

We will generally only need to process your information for this purpose if you were involved or affected by such an incident in some way.

**Legal basis for processing**:ourlegitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
**Legitimate interests**: preventing crime or suspected criminal activity (such as fraud).

In connection with the enforcement or potential enforcement our legal rights

We will use your information in connection with the enforcement or potential enforcement of our legal rights, including, for example, sharing information with debt collection agencies if you do not pay amounts owed to us when you are contractually obliged to do so. Our legal rights may be contractual (where we have entered into a contract with you) or non-contractual (such as legal rights that we have under copyright law or tort law).

**Legal basis for processing**: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
**Legitimate interest:** enforcing our legal rights and taking steps to enforce our legal rights.

In connection with a legal or potential legal dispute or proceedings

We may need to use your information if we are involved in a dispute with you or a third party for example, either to resolve the dispute or as part of any mediation, arbitration or court resolution or similar process.

**Legal basis for processing:** our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
**Legitimate interest(s):** resolving disputes and potential disputes.

For ongoing compliance with laws, regulations and other legal requirements

We will use and process your information in order to comply with legal obligations to which we are subject. For example, we may need to disclose your information pursuant to a court order or subpoena if we receive one.

**Legal basis for processing**:compliance with a legal obligation (Article 6(1)(c) of the General Data Protection Regulation). **Legal obligation(s)**:legal obligations to disclose information which are part of the laws of England and Wales or if they have been integrated into the United Kingdom’s legal framework (for example in the form of an international agreement which the United Kingdom has signed).

**Legal basis for processing**:our legitimate interests(Article 6(1)(f) of the General Data Protection Regulation).
**Legitimate interest**: where the legal obligations are part of the laws of another country and have not been integrated into the United Kingdom’s legal framework, we have a legitimate interest in complying with these obligations.

**How long we retain your information**

This section sets out how long we retain your information. We have set out specific retention periods where possible. Where that has not been possible, we have set out the criteria we use to determine the retention period.

**Retention periods**

We retain information on our server logs for as long as needed and try to delete information that is no longer needed from the business point of view.

Order information: when you place an order for goods and services, we retain that information for at least six years following the end of the financial year in which you placed your order, in accordance with our legal obligation to keep records for tax purposes.

Correspondence and enquiries: when you make an enquiry or correspond with us for any reason, whether by email or via our contact form or by fax or phone or in person, we will retain your information for as long as it takes to respond to and resolve your enquiry, and you are likely to stay on our customer database if you are a business or a customer so that we can send you legitimate information about relevant goods and services that we can provide.

Newsletter and marketing materials including catalogue and email marketing: we retain the information you used to sign up for our e-newsletter for as long as you remain subscribed (i.e. you do not unsubscribe) or if we decide to cancel our e-newsletter service, whichever comes earlier.

**Criteria for determining retention periods**

In any other circumstances, we will retain your information for no longer than necessary, taking into account the following:

* [the purpose(s) and use of your information both now and in the future (such as whether it is necessary to continue to store that information in order to continue to perform our obligations under a contract with you or to contact you in the future);
* whether we have any legal obligation to continue to process your information (such as any record-keeping obligations imposed by relevant law or regulation);
* whether we have any legal basis to continue to process your information (such as your consent);
* how valuable your information is (both now and in the future);
* any relevant agreed industry practices on how long information should be retained;
* the levels of risk, cost and liability involved with us continuing to hold the information;
* how hard it is to ensure that the information can be kept up to date and accurate; and
* any relevant surrounding circumstances (such as the nature and status of our relationship with you).]

**How we secure your information**

We take appropriate technical and organisational measures to secure your information and to protect it against unauthorised or unlawful use and accidental loss or destruction, including:

* only sharing and providing access to your information to the minimum extent necessary, subject to confidentiality restrictions where appropriate, and on an anonymised basis wherever possible;
* using secure servers to store your information;
* verifying the identity of any individual who requests access to information prior to granting them access to information;
* using Secure Sockets Layer (SSL) software to encrypt any payment transactions you make on or via our website;

**Transmission of information to us by email**

Transmission of information over the internet is not entirely secure, and if you submit any information to us over the internet (whether by email, via our website or any other means), you do so entirely at your own risk.

We cannot be responsible for any costs, expenses, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of your decision to transmit information to us by such means.

**Transfers of your information outside the European Economic Area**

All of your information is stored in the following European Economic Area (EEA) countries [country/countries: UK and possibly at times where Mail Chimp stores it’s data although at the time of writing this there is minimal usage of Mail Chimp.

Other than to comply with any legal obligations to which we are subject (compliance with a court order, for example), we do not intend to transfer your information outside the EEA or to an international organisation. In the unlikely event that we are required to transfer your information outside the EEA (or to an international organisation) for such a purpose, we will ensure appropriate safeguards and protections are in place.

**Google Analytics**

Information collected by Google Analytics (your IP address and actions you take in relation to our website) is transferred outside the EEA and stored on Google’s servers. You can access Google’s privacy policy here: <https://www.google.com/policies/privacy/>

Country of storage: United States of America. This country is not subject to an adequacy decision by the European Commission.

Safeguard(s) used: Google has self-certified its compliance with the EU-U.S. Privacy Shield which is available here: <https://www.privacyshield.gov/welcome>. The EU-U.S. Privacy Shield is an approved certification mechanism under Article 42 of the General Data Protection Regulation, which is permitted under Article 46(2)(f) of the General Data Protection Regulation. You can access the European Commission decision on the adequacy of the EU-U.S. Privacy Shield here: <http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm>

**Your rights in relation to your information**

Subject to certain limitations on certain rights, you have the following rights in relation to your information, which you can exercise by writing to

Jenny Mosley

28A Gloucester Road

Trowbridge Wiltshire BA14 0AA

Or by emailing: Circletime@jennymosley.co.uk stating your request.

* **to request access to your information** and information related to our use and processing of your information;
* **to request the correction or deletion** of your information;
* **to request that we restrict our use** of your information;
* **to receive information which you have provided to us in a structured, commonly used and machine-readable format** (e.g. a CSV file) and the right to have that information transferred to another data controller (including a third party data controller);
* **to object to the processing of your information for certain purposes** (for further information, see the section below entitled Your right to object to the processing of your information for certain purposes); and
* **to withdraw your consent to our use of your information** at any time where we rely on your consent to use or process that information. Please note that if you withdraw your consent, this will not affect the lawfulness of our use and processing of your information on the basis of your consent before the point in time when you withdraw your consent.

In accordance with Article 77 of the General Data Protection Regulation, you also have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or of an alleged infringement of the General Data Protection Regulation.

For the purposes of the UK, the supervisory authority is the Information Commissioner’s Office (ICO), the contact details of which are available here: <https://ico.org.uk/global/contact-us/>

Further information on your rights in relation to your personal data as an individual

The above rights are provided in summary form only and certain limitations apply to many of these rights. For further information about your rights in relation to your information, including any limitations which apply, please visit the following pages on the ICO’s website:

* <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>; and
* <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

You can also find out further information about your rights, as well as information on any limitations which apply to those rights, by reading the underlying legislation contained in Articles 12 to 22 and 34 of the General Data Protection Regulation, which is available here: <http://ec.europa.eu/justice/data-protection/reform/files/regulation_oj_en.pdf>

Verifying your identity where you request access to your information

Where you request access to your information, we are required by law to use all reasonable measures to verify your identity before doing so.

These measures are designed to protect your information and to reduce the risk of identity fraud, identity theft or general unauthorised access to your information.

*How we verify your identity*

Where we possess appropriate information about you on file, we will attempt to verify your identity using that information.

If it is not possible to identity you from such information, or if we have insufficient information about you, we may require original or certified copies of certain documentation in order to be able to verify your identity before we are able to provide you with access to your information.

We will be able to confirm the precise information we require to verify your identity in your specific circumstances if and when you make such a request.

**Your right to object to the processing of your information for certain purposes**

You have the following rights in relation to your information, which you may exercise by writing to:

Jenny Mosley

28A Gloucester Road

Trowbridge Wiltshire BA14 0AA

Or by emailing: Circletime@jennymosley.co.uk stating your request.

* to object to us using or processing your information where we use or process it in order to **carry out a task in the public interest** **or for our legitimate interests**, including ‘profiling’ (i.e. analysing or predicting your behaviour based on your information) based on any of these purposes; and
* to object to us using or processing your information for **direct marketing purposes** (including any profiling we engage in that is related to such direct marketing).

You may also exercise your right to object to us using or processing your information for direct marketing purposes by:

* **clicking the unsubscribe link** contained at the bottom of any marketing email we send to you with a message saying “UNSUBSCRIBE” or by following any the instructions which appear in your browser following your clicking on that link;
* **sending an email** to circletime@jennymosley.co.uk asking that we stop sending you marketing communications or by including the words “OPT OUT”.

For more information on how to object to our use of information collected from cookies and similar technologies, please see our cookies policy on this website..

**Sensitive Personal Information**

‘Sensitive personal information’ is information about an individual that reveals their racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic information, biometric information for the purpose of uniquely identifying an individual, information concerning health or information concerning a natural person’s sex life or sexual orientation.

We do not knowingly or intentionally collect sensitive personal information from individuals, and you must not submit sensitive personal information to us.

If, however, you inadvertently or intentionally transmit sensitive personal information to us, you will be considered to have explicitly consented to us processing that sensitive personal information under Article 9(2)(a) of the General Data Protection Regulation. We will use and process your sensitive personal information for the purposes of deleting it.]

**Changes to our Privacy Policy**

We update and amend our Privacy Policy from time to time.

Minor changes to our Privacy Policy

Where we make minor changes to our Privacy Policy, we will update our Privacy Policy with a new effective date stated at the beginning of it. Our processing of your information will be governed by the practices set out in that new version of the Privacy Policy from its effective date onwards.

Major changes to our Privacy Policy or the purposes for which we process your information

Where we make major changes to our Privacy Policy or intend to use your information for a new purpose or a different purpose than the purposes for which we originally collected it, we will notify you by email (where possible) or by posting a notice on our website.

We will provide you with the information about the change in question and the purpose and any other relevant information before we use your information for that new purpose.

Wherever required, we will obtain your prior consent before using your information for a purpose that is different from the purposes for which we originally collected it.

**Children’s Privacy**

Because we care about the safety and privacy of children online, we comply with the Children’s Online Privacy Protection Act of 1998 (COPPA). COPPA and its accompanying regulations protect the privacy of children using the internet. We do not knowingly contact or collect information from persons under the age of 18. The website is not intended to solicit information of any kind from persons under the age of 18.

It is possible that we could receive information pertaining to persons under the age of 18 by the fraud or deception of a third party. If we are notified of this, as soon as we verify the information, we will, where required by law to do so, immediately obtain the appropriate parental consent to use that information or, if we are unable to obtain such parental consent, we will delete the information from our servers. If you would like to notify us of our receipt of information about persons under the age of 18, please do so by sending an email to Circletime@jennymosley.co.uk.

**Copyright, credit and logo**

This Privacy Policy is based on a General Data Protection Regulation (Regulation (EU) 2016/769) (GDPR) compliant template provided by GDPR Privacy Policy. For further information, please visit <https://gdprprivacypolicy.org>

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Where we display the GDPR Privacy Policy logo on our website, this is used to indicate that we have adopted a privacy policy template provided by GDPR Privacy Policy as the basis for this Privacy Policy.