

## Data Protection Privacy Notice

New data protection regulations, called the General Data Protection Regulations (GDPR), came into force on 25 May 2018.

The General Data Protection Regulation (GDPR) give individuals more control over how organisations use their personal data including: the right to be informed about how organisations use their data, rights to request access to their personal data, rights to amend incorrect data, rights to restrict what data can be used for, the right to have their data deleted, the right to object and the right to data portability.

These changes are intended to make it easier for you to find out how we use and protect your information.

This privacy notice provides you with details of how Smarti Ludlow Limited collects and processes your personal data.

We take privacy very seriously and adhere to the General Data Protection Regulation.

The Privacy Notice outlines how Smarti Ludlow Limited uses personal data we collect from you

By communicating with or purchasing products and services Smarti Ludlow Limited, you are agreeing to the transfer, storing or processing of your data as set out within this policy notice.

We require these details in order to keep you updated and fulfil our contract with you.

By providing us with your data, you warrant to us that you are over 13 years of age.

## Privacy Notice

### Contact Details

Our full details are:

Full name of legal entity: Smarti Ludlow Limited

Email address: info@smarti-ludlow.co.uk

Postal address: 147 Corve Street, Ludlow, Shropshire, SY8 2PG

### Why do we hold personal information about you?

(Personal data means any information capable of identifying an individual)

We may process the following categories of personal data about you:

#### *Communication Data*

This may include any communication that you send to us whether that be through our website, through email, text, social media messaging, social media posting or any other communication that you send us.

We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims. Our lawful ground for this processing is our

legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.

#### *Customer Data*

This includes data relating to any purchases of goods and/or services such as your name, title, billing address, delivery address email address, phone number, contact details, purchase details and your card details.

We process this data to supply the goods and/or services you have purchased and to keep records of such transactions. Our lawful ground for this processing is the performance of a contract between you and us and/or taking steps at your request to enter into such a contract.

#### *User Data*

This may include data about how you use our website and any online services together with any data that you post for publication on our website or through other online services.

Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business.

#### *Technical Data*

This includes data about your use of our website and/or online services.

Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business and to grow our business and to decide our marketing strategy.

We will only use your personal data for a purpose it was collected for or a reasonably compatible purpose if necessary.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

### **Collection of Personal Data**

We may collect data about you by you providing the data directly to us (for example by filling in forms on our site or by sending us emails). We may automatically collect certain data from you as you use our website by using cookies and similar technologies, or through third party organisations.

We may receive data from third parties such as analytics providers such as Google based outside the EU, advertising networks such as Facebook based outside the EU, such as search information providers such as Google based outside the EU, providers of technical, payment and delivery services, such as data brokers or aggregators.

### **Marketing and Communications**

Our lawful ground of processing your personal data to send you marketing communications is either your consent or our legitimate business interests.

Under the Privacy and Electronic Communications Regulations, we may send you marketing communications from us if (i) you made a purchase or asked for information from us about our goods or services or (ii) you agreed to receive marketing communications and in each case you have not opted out of receiving such communications since.

Under these regulations, if you are a limited company, we may send you marketing emails without your consent. You can still opt out of receiving marketing emails from us at any time.

Before we share your personal data with any third party for their own marketing purposes we will get your express consent.

If you opt out of receiving marketing communications this opt-out does not apply to personal data provided as a result of other transactions, such as purchases, warranty registrations etc.

### **Disclosure of your personal data**

We may have to share your personal data with the parties set out below:

- Service providers who provide IT and system administration services
- Professional advisers including lawyers, bankers, auditors and insurer
- Government bodies that require us to report processing activities
- Freelancers or Sub-Contractors who work for us on a contractual basis
- Third party online support service providers, include:
  - Mailchimp.com – Marketing Automation Platform
  - PayPal.Com
  - Co-Operative Bank – Online and Banking Payment Processors
  - Ebay
  - Microsoft – Email and cloud storage provider
  - Card payment providers

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

### **International transfers**

We share some of your personal data which involves transferring your data outside the European Economic Area (EEA), for example our email provider Microsoft is based in the USA

Countries outside of the European Economic Area (EEA) do not always offer the same levels of protection to your personal data, so European law has prohibited transfers of personal data outside of the EEA unless the transfer meets certain criteria.

Several of our third parties service providers are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is in place:

- We will only transfer your personal data to countries that the European Commission have approved as providing an adequate level of protection for personal data by; or
- Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or
- If we use US-based providers that are part of EU-US Privacy Shield, we may transfer data to them, as they have equivalent safeguards in place.

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

### **Data Security**

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions and they must keep it confidential.

We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

### **Data Retention**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

When deciding what the correct time is to keep the data for we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers.

### **Your Rights**

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

You can see more about these rights at: <https://ico.org.uk/>

If you wish to exercise any of the rights set out above, please email us at [info@smarti-ludlow.co.uk](mailto:info@smarti-ludlow.co.uk)

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

**Website links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

**Cookies**

This website does not collect cookies.

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