

Privacy policy (Data Processor)

1. Introduction

This website is hosted by Sygnet Interactive Ltd. This policy relates to the privacy of data held by Sygnet Interactive Ltd as a data processor.

- 1.1 We are committed to safeguarding the privacy of website visitors and service users.
- 1.2 This policy applies as we are acting as a data processor with respect to the personal data of the website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 By using the website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.
- 1.4 In this policy, "we", "us" and "our" refer to Sygnet Interactive Ltd (the website hosting company) For more information about us, see Section 13.

2. Credit

- 2.1 This document was created with assistance from SEQ Legal (<https://seqlegal.com>).

3. How we use your personal data

We do not use or access your personal data. However your personal data may be processed by the website for the following purposes where applicable.

(Processed being defined as "Any use of computers to perform defined operations on data")

- 3.1 In this Section 3 we have set out:
 - (a) the general categories of personal data that we may process;
 - (b) the purposes for which we may process personal data; and
 - (c) the legal bases of the processing.
- 3.3 We may process your account data ("**account data**"). The account data may include your name and email address. The source of the account data is you or your employer. The account data may be processed for the purposes of operating the website, ensuring the security of the website and maintaining back-ups of our databases. The legal basis for this processing is consent OR our legitimate interest, namely the proper operation of the website.
- 3.4 We may process your information included in your personal profile ("**profile data**"). The profile data may include your name, address, telephone number, email address, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details and employment details. The profile data may be processed for the purposes of operating the website, ensuring the security of the website and maintaining back-ups of

our databases. The legal basis for this processing is consent OR our legitimate interest, namely the proper operation of the website.

- 3.6 We may process information that you post for publication on the website ("**publication data**"). The publication data may be processed for the purposes of enabling such publication and operating the website and services. The legal basis for this processing is consent OR our legitimate interest, namely the proper operation of the website .
- 3.7 We may process information contained in any enquiry you submit to the website ("**enquiry data**"). The legal basis for this processing is consent OR our legitimate interest, namely the proper operation of the website
- 3.8 We may process information relating to transactions, including purchases of goods and services, that you enter through the website ("**transaction data**"). The transaction data may include your contact details, and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and the website owner and/or taking steps, at your request, to enter into such a contract and our legitimate interest, namely our interest in the proper operation of the website.
- 3.9 We may process information that you provide to us for the purpose of subscribing to email notifications and/or newsletters] ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent OR the performance of a contract between you and the website owners and/or taking steps, at your request, to enter into such a contract.
- 3.10 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 3.11 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 3.12 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
- 3.14 Please do not supply any other person's personal data to us.

4. Providing your personal data to others

- 4.1 We do not supply your personal data to any third party
- 4.2 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 4.3 Financial transactions relating to our website and services are OR may be handled by payment services providers. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds.
- 4.4 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

5. International transfers of your personal data

- 5.1 We do not transfer your personal data.
- 5.2 You acknowledge that personal data that you submit for publication through the website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

6. Retaining and deleting personal data

The website owner is responsible for the management of personal data as Data Controller, however,

- 6.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

- 6.3 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:
- (a) the period of retention of account data will be determined based on the contractual period of membership or subscription.
 - (b) the enquiry database will be held for 3 months unless for action purposes this time needs to be reasonably extended up to 1 year maximum.
- 6.4 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

7. Amendments

- 7.1 We may update this policy from time to time by publishing a new version on our website.
- 7.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 7.3 We may notify you of changes to this policy [by email or through the private messaging system on our website].

8. Your rights

- 8.1 In this Section 8, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.
- 8.2 Your principal rights under data protection law are:
- (a) the right to access;
 - (b) the right to rectification;
 - (c) the right to erasure;
 - (d) the right to restrict processing;
 - (e) the right to object to processing;
 - (f) the right to data portability;
 - (g) the right to complain to a supervisory authority; and

(h) the right to withdraw consent.

- 8.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.
- 8.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.
- 8.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law and the personal data has been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.
- 8.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
- 8.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- 8.8 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your

particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

- 8.9 To the extent that the legal basis for our processing of your personal data is:
- (a) consent; or
 - (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,

and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

- 8.10 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.
- 8.11 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 8.12 You may exercise any of your rights in relation to your personal data by written notice to us.

9 Security

To prevent unauthorised disclosure or access to your personal data, we have implemented strong physical and electronic security safeguards. Including but not limited to

Data Encryption

Password protected access to data limiting access to the website owners only

Firewall protection

Anti-virus, internet and network protection software

Our primary hosting location has alarm, CCTV and controlled access management.

Our resilience planning includes Password and Encrypted back-ups data sets

Access monitoring software to comply with data security and breach reporting

10. About cookies

- 10.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 10.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 10.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

11. Cookies that we use

- 11.1 We use cookies for the following purposes:

(a) The technology we use to operate the website will set an **ASP.NET** session **cookie** to enable the website to work correctly and improve the visitor experience whilst using the website. This session **cookie** is cleared when the browser is closed.

13. Our details

- 13.1 This website is hosted by Sygnet Interactive Ltd.
- 13.2 We are registered in England and Wales under registration number 4122023 and our registered office is at

10 Tonbridge Chambers

Pembury Road

Tonbridge

Kent, TN9 2HZ
- 13.3 Our principal place of business is at the above address
- 13.4 You can contact us:
 - (a) by post, to the postal address given above
 - (c) by telephone, on 01732355775

(d) by email, using info@sygnet.co.uk

14. Data protection officer

14.1 Our data protection officer's contact details are:

Graham Hughes, Director

Sygnet Interactive Ltd

10 Tonbridge Chambers

Pembury Road

Tonbridge

Kent, TN9 2HZ