

## PRIVACY NOTICE

This Privacy Notice sets out the details of how Steffie Martin Ltd (“we”, “us”, “our”) collects and processes your personal data through its website located at [www.steffiemartin.com](http://www.steffiemartin.com) .

For the purposes of this Notice, personal data means any information that can be used to identify an individual whether directly or indirectly.

Please read through the content of this Privacy Notice carefully and ensure that you understand it. If you do not understand the content of this Privacy Notice or do not accept or agree with it then you must stop using the website at [www.steffiemartin.com](http://www.steffiemartin.com) immediately.

By accessing the website at [www.steffiemartin.com](http://www.steffiemartin.com) and providing us with your personal data you are warranting that you are over 13 years of age.

### **What personal data do we process, why do we process it, and how do we collect it?**

We may process personal data that you provide to us by subscribing to our newsletter or email list, requesting information through our contact form, or by any other communication via email, text or through our website or other online platforms and social media channels.

We may also process your personal data through the use of cookies or other tracking software (please refer to our cookie policy for further information).

When we process your personal data, we will comply with the relevant data protection laws and principles, which means that your data will be used lawfully, fairly and in a transparent way, kept securely and only for as long as necessary for the purposes we have told you about.

The types of personal data which we process will vary depending on your own specific circumstances but typically can include:

Personal Information, which may include your name, date of birth, email address, phone number, business contact details, correspondence address, IP address. We shall process this data for the purposes of communicating with you and keeping our records.

Customer or Client information, should you purchase goods and/or services from us then we may process information in connection with your purchase, and the supply of that purchase, as well as keeping appropriate records. Such information may include your Personal Information, billing address, delivery address, credit card or other payment details.

User Information, this may include comments or statements that you may make or post via our website, online platforms or social media channels, images, documents or videos that you share on or through our website or through any of our pages or other online platforms, and information concerning your use of our website or other online platforms such as your browser information, page views, number of visits and where appropriate log-in details. We shall process this information to analyse and monitor usage and content of our website and other platforms and channels to ensure the content is relevant to you, to support our administration and record keeping requirements, and to maintain security of our systems.

Promotional Information, this may include information you provide in connection with any promotions, marketing or advertising from us or our third parties. We shall use this information to provide relevant offers and advertisements, competitions and promotions and other free resources and to monitor our promotional activity, keep records and compile analytics.

In accordance with the Privacy and Electronic Communications Regulations (PECR) we may deliver or send you promotional or marketing information in cases where you have made an enquiry about or purchased goods or services from us or you have consented to receive contact for promotional or marketing purposes and you have not withdrawn your consent or opted out.

We may also process your personal data to deliver or send relevant advertisements to you through our website and other online platforms and to analyse the success and effectiveness of such adverts for the purposes of promoting and growing our business.

### **Sensitive Data**

We do not collect any sensitive data about you. Sensitive data includes data relating to your health, race or ethnic origin, religious or political beliefs, trade union membership, genetics, biometrics, sex life or sexual orientation. We do not process any data relating to criminal offences and convictions.

We shall only collect and process your personal data for purposes that are clearly outlined prior to you providing us with your data or for a legitimate reason.

Whenever we process your personal data we do so on the basis of a lawful condition this will either be because you have given your consent for us to process your data, where we are under a contractual or legal obligation or where it is in our legitimate interests.

It is very important to us that the information we hold about you is complete, accurate and up to date. If at any time your personal details change, please let us know by emailing us at [connect@steffiemartin.com](mailto:connect@steffiemartin.com) so we can update our records.

### **Disclosure of personal data**

We may share your personal data as follows:

- I. Where it is necessary for external service providers who have been engaged by us to assist in the provision of services to our clients and customers;
- II. Where it is required by our professional support teams;
- III. Where we are required by a government body or legal obligation or to protect our rights;
- IV. Where it is required in connection with the sale or purchase of any business or assets;
- V. With any other member or company of our group;

Where we have outsourced a function or activity to an external service provider we will only disclose personal data that the service provider needs to undertake that function or activity, and we require external service providers to agree to keep your personal data secure in accordance with the relevant law.

### **Transfer of personal data outside of the EEA**

[Your personal data will only be stored within the UK]

### **Data security**

We take the protection of your personal information seriously and have taken suitable and reasonable steps to protect the personal information we hold from misuse, loss, unauthorised access, and any modification or disclosure.

We limit access to your personal data to those employees, agents, contractor or third parties who have a business need to know. They will only process your data on our instructions and must keep it confidential.

If you are submitting personal data over the internet that you wish to remain private, please note that while attempts are made to secure information transmitted to this site, there are inherent risks in transmitting information across the internet. If you prefer, you can contact us by alternative means using phone or mail.

### **Data retention**

We will not keep your personal data for longer than is required with regard to the purpose for which it was collected by us or provided by you including any legal or record keeping requirements and will take reasonable steps to destroy or permanently de-identify your personal data when it is no longer required

### **Your rights in relation to the data we hold**

You have rights in relation to your personal data these include the right to access and receive a copy of your personal data, to ask us to correct any errors, to erase your personal data, to restrict how your information is processed.

Where you have provided your consent for us to process your personal data you can withdraw that consent at any time. Should you wish to do so please contact us at [connect@steffiemartin.com](mailto:connect@steffiemartin.com).

If you are not happy with how we process your personal data you have the right to lodge a complaint with the Information Commissioners Office (ICO), the UK supervisory authority for data protection issues.

### **Links to other sites**

The website at [www.steffiemartin.com](http://www.steffiemartin.com) may contain links to other sites. We are not responsible for the privacy practices of those websites and have no knowledge of whether cookies or other tracking devices are used on any such linked sites.

If you have any concerns regarding the privacy of your information you should ensure you are aware of the privacy policies of those sites before disclosing any personal information.

### **Further information**

If you have any questions about this Privacy Notice or require more information concerning our privacy practices please contact [connect@steffiemartin.com](mailto:connect@steffiemartin.com).

### **Changes to this Privacy Policy**

This privacy policy is accurate as at 24/05/2018. We reserve the right to alter or amend it without notice. Should the Privacy Policy be altered, the new policy will be posted on the website at 24/05/2018.

Your first use of our website after the date of any amendments or alterations will constitute your acceptance of such changes therefore we recommend you review this Privacy Policy regularly to keep informed of any changes.